

BEFORE THE ELECTRICITY OMBUDSMAN (MUMBAI)

(Appointed by the Maharashtra Electricity Regulatory Commission
under Section 42(6) of the Electricity Act, 2003)

REPRESENTATION NO. 84 OF 2025

In the matter of excess billing

Khairunnisa Yusuf Memon Appellant
(CA. No. 153537878)

V/s.

Adani Electricity Mumbai Limited (AEML)..... Respondent

Appearances:

Appellant : 1. Yusuf H. Memon, Representative & husband of the Appellant
2. Fakhruddin Y. Memon, son of the Appellant

Respondent: 1. Mritunjay Jha, General Manager & Nodal Officer
2. Vinay Warule, In Charge Zonal Commercial, Andheri


Coram: Vandana Krishna [IAS. (Retd.)]

Date of hearing: 11th November 2025

Date of Order: 3rd December 2025

ORDER


This Representation was filed on 20th May 2025 under Regulation 19.1 of the Maharashtra Electricity Regulatory Commission (Consumer Grievance Redressal Forum & Electricity Ombudsman) Regulations, 2020 (CGRF & EO Regulations 2020) against the Order dated 15th April 2025 passed by the Consumer Grievance Redressal Forum, AEML (the Forum). The Forum by its order dated 15th April 2025 directed as below:


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- (i) *The Complainant/Applicant shall obtain a meter testing slot at a Government-approved NABL-accredited laboratory and shall intimate the same to the Respondent in advance.*
- (ii) *The Complainant/Applicant shall make the necessary payment of meter testing charges to the concerned Government-approved NABL-accredited laboratory.*
- (iii) *The Respondent is hereby directed to coordinate with and extend all necessary assistance to the Complainant/Applicant in the meter testing process, including furnishing the name, address, and contact details of Government-approved NABL-accredited laboratories situated in Mumbai.*
- (iv) *The Respondent is further directed to take necessary action for revision of the bill and refund of testing charges, as applicable, upon receipt of the meter testing report from the Government-approved NABL-accredited laboratory in accordance with the Regulations 15.6.2 of Maharashtra Electricity Regulatory Commission (Electricity Supply Code and standards of Performance of Distribution Licensees including Power Quality), Regulations 2021.*
- (v) *In the event the Complainant/Applicant fails to initiate the process for testing the meter at a Government-approved NABL-accredited laboratory within 60 (sixty) days from the date of issuance of this order, the Respondent shall be at liberty to initiate recovery proceedings for the energy bill in accordance with the applicable provisions of the Electricity Act, 2003 and the relevant regulations, by adjusting the amount of ₹5,930.00 (Rupees Five Thousand Nine Hundred Thirty Only) already remitted pursuant to the interim order dated 28.02.2025 against the outstanding energy bill of the Complainant/Applicant.*

2. Aggrieved by the order of the Forum, the Appellant has filed this representation. A physical/e-hearing was conducted on 29.08.2025, wherein the Appellant's representatives appeared in person and the Respondent participated through video conference. All parties were heard at length. The submissions and arguments of the Respondent (AEMML) are as below: [Note: The Electricity Ombudsman's observations and comments are recorded under 'Notes' where needed.]



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- (i) The Appellant is a consumer (No.153537878) since 21.08.2023 billed under commercial tariff category. The premises are used for office purpose. The details of the electricity connection are as below:

Name of Consumer	Consumer No.	Address on Bill	Sanct. Load	Date of Supply	Purpose
Khairunnisa Yusuf Memon	153537878	Opp.Bindra Niwas Building, 1st Floor, Plot No.31, CTS No.189, Near Raj Palace, 83, J.P.Road, Andheri (West), Mumbai-400058	1 KW	21.08.2023	Business Office

- (ii) On 26.07.2024, the Respondent received a High Consumption Complaint (HCC) from the Appellant regarding the June 2024 bill, which reflected consumption of 888 units amounting to ₹11,940/-. The complaint was registered vide Complaint No. 1037483227. Acting on the complaint, the Respondent's personnel visited the site on 30.07.2024 and inspected Meter No. SM10397188 (Genus make) and the meter was found "OK".
- (iii) As the Appellant remained dissatisfied, Meter No. SM10397188 was replaced with Meter No. SM11299107 on 23.10.2024. The old meter was sent to the AEML Meter Testing Laboratory, where it was found to be in proper working condition. The test report is on record.
- (iv) The Respondent has repeatedly informed the Appellant that the meter is functioning correctly. If the Appellant disputes the functioning of the meter or the AEML test report, she may get the meter tested at any Government-approved NABL-accredited laboratory. For this, she must obtain an appointment, complete the required formalities, and inform the Respondent in advance, so that the meter can be produced for testing.
- (v) Although the Respondent explained the NABL testing formalities and the prescribed charges, the Appellant did not complete the required procedures and instead continued raising complaints at various levels. A copy of Respondent's letter dated 07.02.2025 is on record.


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- (vi) Electricity bills are issued strictly on the basis of actual consumption recorded in the meter. The bills issued to the Appellant are correct. A statement of consumption for the period from Aug. 2023 to Oct. 2025 is tabulated as below:

Table 2:

Year	2023-24			2024-25			2025-26		
Month	Cons. (Units)	Status	Date of reading	Cons. (Units)	Status	Date of reading	Cons. (Units)	Status	Date of reading
Apr				21	Estimated	4/29/2024	77	Normal	4/28/2025
May				19	Estimated	6/1/2024	90	Normal	5/28/2025
Jun				888	Normal	6/29/2024	69	Normal	6/28/2025
Jul				212	Normal	7/29/2024	85	Normal	7/29/2025
Aug	0	Normal	8/30/2023	114	Normal	8/29/2024	81	Normal	8/30/2025
Sep	2	Normal	9/29/2023	110	Normal	9/28/2024	32	Normal	9/27/2025
Oct	4	Normal	10/30/2023	76	Normal	10/30/2024	91	Normal	10/30/2025
Nov	9	Normal	11/29/2023	101	Normal	11/29/2024			
Dec	22	Normal	12/29/2023	61	Normal	12/28/2024			
Jan	17	Normal	1/29/2024	66	Normal	1/28/2025			
Feb	8	Normal	2/28/2024	97	Normal	2/27/2025			
Mar	42	Normal	3/29/2024	79	Normal	3/29/2025			


[Note: The new connection was released on 21.08.2023 for office purpose.]


- (vii) The message in the bills was given for estimated bills of April & May 2024 which is reproduced as below:

“As your meter could not be read this month, the consumption has been estimated. Your bill shall be amended upon availability of meter reading subsequently. You can also share your meter reading by sending us e-mail at helpdesk.mumbaelectricity@adani.com for applicable amendment.”

- (viii) MRI data of the meter has been downloaded. The monthly consumption recorded in the meter’s 11-month log is provided in Table 3.


Table 3


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Month	Cons. (Units)	Period
Nov	9.61	A month is considered from 00:00 hours of the first day to 24:00 hours of the last day.
Dec	21.78	
Jan	17.11	
Feb	11.44	
Mar	93.73	
Apr	427.48	
May	206.76	
Jun	300.15	
Jul	165.87	
Aug	114.6	
Sep	106.47	

- (ix) As per MRI data, consumption is computed from 00:00 hrs of the first day to 24:00 hrs of the last day of each month, whereas billing is based on the reading cycle shown in Table 2. The Appellant has consumed electricity, which is costly, and is legally bound to pay for the same. No waiver is permissible.
- (x) The Appellant filed a grievance before the Forum on 18.02.2025 requesting revision of the June 2024 bill. The Appellant also admitted that construction work at Bindra Niwas had obstructed access to the meter due to tin-sheet barricading.
- (xi) By its order dated 15.04.2025, the Forum held that if the Consumer was not satisfied with AEML's test results, she may get the meter tested at a Government-approved NABL laboratory. On receipt of the NABL test report, the Respondent would revise the bill and refund testing charges, if applicable, in compliance with Regulation 15.6.2 of the MERC Supply Code & SoP Regulations, 2021. The Forum issued a reasoned order and further directed that if the Appellant failed to initiate testing within 60 days, Respondent could commence recovery proceedings. Despite the Respondent's full cooperation, the Appellant failed to secure an NABL testing appointment. Due to non-payment of overdue charges of ₹8,340/, the electricity supply to CA No. 153537878 was disconnected on 02.09.2025 after due process. The Appellant later paid the dues, and supply was restored on 16.09.2025.
- (xii) Instead of complying with the Forum's order, the Appellant has filed this representation solely to misuse the valuable time of this Hon'ble Authority and to harass the Respondent's officers.



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- (xiii) In light of the above facts, the present representation is devoid of merit both in law and on facts. The Respondent therefore prays that the representation be rejected with exemplary costs.

3. The Appellant's submissions and arguments are as below:


- (i) The Appellant is a consumer (No. 153537878) from 21.08.2023 for the purpose of running an office, and is billed under commercial tariff category. The details of electric connection are provided in Table 1. The area of the premises is about 36 (=6 x 6) sq. feet.
- (ii) The Appellant received an extreme high bill of Rs. 11,860/- for 888 units in the month of June 2024. This high consumption is not possible. This clearly indicates that the meter has misbehaved in the particular month. The consumption pattern of the Appellant is in the range of 10 to 150 units per month. The Appellant travelled out of Mumbai for 10 to 20 days in a month. During this period the office was totally closed. There are limited electric gadgets in this small office premises having 1 Computer, 2 LED lights, 2 Fans, 1 AC and misc. electric points, and the office mostly remains closed for 15 days in a month.
- (iii) The development of the neighbouring society, Bindra Niwas, has begun, and the developer, M/s Delta Builders, has covered the plot area with a tin cover, preventing AEML (Respondents) officer from recording the electricity meter reading. In response, the Appellant took it upon themselves to remove part of the tin cover to make the meter accessible for reading. The billing for the month of June 2024 has been generated without recording actual reading, resulting in the electricity bill for June 2024 showing a sudden spike in consumption from 144 units to 1032 units, an increase of 888 (=1032-144) units, which is disputed and deemed impossible. Upon reviewing the records, it is clear that the high consumption was only reflected in the June 2024 bill, with normal usage showing in July 2024.
- (iv) The Appellant lodged a high bill complaint to AEML Consumer Facility Centre on 26.07.2024. AEML inspected the premises and reported in a mechanical way that the meter was found in order, and refused to revise the bill as per the previous consumption


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pattern, and to replace the existing meter on priority. The Appellant made several reminders dated 12.08.2024, 04.09.2024, 25.09.2024, 04.10.2024, 08.11.2024, 21.11.2024 & 04.01.2025. However, the AEML failed to give a proper solution for complaint resolution.

- (v) The Respondent issued several disconnection notices on 21.08.2024, 20.11.2024, 02.01.2025, 18.01.2025, and 07.02.2025 to mentally torture the consumer.
- (vi) The meter was tested for namesake on 04.11.2024, however, there is no transparency in the testing of the meter.
- (vii) The June 2024 consumption of 888 units is abnormally high compared to both the preceding and subsequent months (Aug 2023–Aug 2024). Table 2 shows the detailed consumption pattern since the connection.
- (viii) The Appellant filed a grievance on 18.02.2025 seeking revision of the June 2024 bill based on actual consumption pattern. The Forum held the first hearing and, under Regulation 9.9 of the CGRF & EO Regulations 2020, directed interim payment of ₹5,930 on 28.02.2025. The Appellant paid ₹2,000 on 27.02.2025 and ₹6,000 on 08.03.2025.
- (ix) By order dated 15.04.2025, the Forum directed the Appellant to arrange meter testing at a Govt-approved NABL lab and the Respondent to assist. As the testing charges exceed the outstanding dues, the Forum's direction does not offer a practical solution for bill revision based on consumption pattern.
- (x) The Appellant filed a representation on 20.05.2025 in this office. It was learnt that the Secretariat of this office issued a deposit notice dated 22.05.2025 for Rs. 2500/- against the outstanding dues of Rs.5000/-. However, no notice was received as claimed by the Appellant. [*Note: It is confirmed that this notice was issued by post on 22.05.2025 as well as sent on his email address on 23.05.2025 at 4:22 p.m.*]
- (xi) The June 2024 bill was ₹11,940/- of which about 50% was already paid. Despite this, the Respondent disconnected supply on 02.09.2025 for dues of ₹8,340/. - The Appellant was kept in the dark until 16.09.2025, even being aware that the grievance was filed before EO Mumbai. The Appellant paid the outstanding dues on 16.09.2025 to the Respondent,


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and the representation was registered on 17.09.2025. This caused undue hardship to the Appellant. *[Note: The Appellant informed telephonically to this office that the total outstanding dues are paid to the Respondent, hence the Representation came to be registered on 17.09.2025.]*


- (xii) The Appellant prays that the Respondent be directed to revise the bill as per the consumption pattern for the period of 1 year prior and post June 2024, and to advise the Respondent to show respect to their consumers.

Analysis and Ruling

4. Heard the parties and perused the documents on record. The Appellant is a consumer under commercial tariff category, running an office. The relevant details are tabulated in Table 1.

5. The Respondent contended that the Appellant raised a High Consumption Complaint for the June 2024 bill of 888 units. Site inspection on 30.07.2024 found the meter working properly. However, the Appellant being not satisfied, the meter was later replaced, and tested at AEML Laboratory which was also confirmed to be in order. Further, the Respondent repeatedly informed the Appellant to opt for NABL testing if she disputed the test results, but she did not complete the required formalities and continued filing complaints. Billing has been correctly issued based on actual consumption, including estimated bills for April and May 2024 due to unreadable meter access during nearby construction. MRI data further supports the recorded consumption. The Forum, by order dated 15.04.2025, directed the Appellant to complete NABL testing within 60 days, failing which recovery could proceed. As she did not comply, supply was disconnected for non-payment and later restored after clearing dues. Instead of following the Forum's directions, the Appellant has filed this meritless representation, warranting rejection with costs.

6. The Appellant contended that she occupies a small 36 sq. ft. office with limited appliances and a normal consumption range of 10–150 units per month, the premises remaining closed for 15–20 days. In June 2024, an abnormal bill of 888 units (₹11,860/-) was issued, allegedly due to meter malfunction. Her meter was blocked by tin sheet barricade of a neighboring development in the month


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of April & May 2024, and after the Appellant temporarily removed the tin, the bill was generated with actual reading, resulting in an unexplained spike of 888 units, whereas July consumption returned to normal. Despite repeated complaints, AEML mechanically declared the meter “OK” and refused bill revision, issuing multiple disconnection notices that added to the Appellant’s hardship. The Forum later advised NABL testing, but the charges exceeded the disputed amount, making it impractical. Supply was disconnected on 02.09.2025 despite part payments and restored only after full payment on 16.09.2025. The Appellant therefore seeks revision of the June 2024 bill as per actual consumption pattern and necessary directions to the Respondent.

7. Considering the various submissions of the parties, the following issue is framed for determination of the case.

➤ **Issue: Whether the Appellant’s meter reading jumped in June 2024?**

➤ **Answer: No.**


The MERC (Electricity Supply Code and Standards of Performance of Distribution Licensees including Power Quality) Regulations, 2021, effective from 25.02.2021, govern the procedure for meter reading. The relevant provision is as follows:

15.4. Reading of Meter

15.4.1. The meter shall be read once in every three months in case of agricultural Consumers, and every month in the case of all other Consumers. Consumer shall extend all facilities to the licensee or his authorised representatives to read the meter:

*Provided that **the meters should be placed in easily accessible common area of the premise or any other place easily accessible.***

In this case, the Respondent received a high consumption complaint from Consumer No. 153537878 regarding the June 2024 bill of ₹11,940 for 888 units. The Appellant stated that construction work at the adjoining premises (Bindra Niwas) had blocked access to the meter with tin sheet barricade. Consequently, the Respondent could not record meter readings for April and May 2024.


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Once this obstruction was cleared, the Respondent recorded the reading in June 2024. This reading represented the **cumulative consumption** for **April, May, and June**, resulting in 888 units. Thus, the so-called “high” reading was not an abnormal spike for one month, but the accumulated usage of three months.

An inspection carried out on 30.07.2024 of Meter No. SM10397188 (Genus make) confirmed that the meter was functioning properly. The meter was replaced on 23.10.2024, and the removed meter was tested at AEML’s laboratory, where it was found to be **accurate and within permissible error limits**. MRI data for 11 months also indicated a rising consumption trend during April–June 2024, fully consistent with the cumulative billing.

As the Appellant is billed under the **commercial tariff**, residential slab benefits are not applicable, and the cumulative 888 units were correctly billed under the commercial rate. An unusually high electricity bill can be attributed to several plausible factors. First, the presence of defective or malfunctioning electrical gadgets can lead to excessive power consumption without the user’s knowledge. Second, poor maintenance of electrical appliances or internal wiring may result in leakages or inefficient operation, thereby increasing energy usage. Third, there is a possibility of unauthorized tapping or use of electricity by an unknown person after the meter, and any such consumption is recorded in the Appellant’s meter. It is important to note that the responsibility for ensuring the safety and integrity of the installation beyond the meter lies with the Appellant.

Electricity meters are manufactured strictly in accordance with the applicable Indian Standard Specifications (IS) and are subjected to rigorous type tests, routine tests, and stringent quality assurance protocols. These procedures ensure the meter’s accuracy, reliability, and sustained performance under a wide range of operating conditions. Genus is a reputed and widely accepted brand in the industry, and its meters are not ordinarily prone to any form of “jumping” or abnormal recording of consumption. In the present case, the meter under consideration (Meter No. SM10397188) is also a Genus make. Genus-brand meters, in particular, are widely recognised for their robust design, advanced metering technology, and high manufacturing standards. Given their proven operational reliability and compliance with


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stringent regulatory requirements, such meters cannot ordinarily be considered susceptible to “meter jumping” or erratic recording in the normal course of functioning.

Accordingly, the units recorded represent actual consumption attributable to these factors and cannot be categorized as meter “jumping” or any abnormal behaviour of the meter.

Accordingly, the answer to the above Issue stands NEGATIVE.

8. The Forum has passed a well-reasoned and justified order. There is no necessity for any interference with the findings or conclusions of the Forum. The Representation is rejected and disposed of accordingly.

Sd/
(Vandana Krishna)
Electricity Ombudsman (Mumbai)


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