

**No GST on Reverse Charge basis applicable on Supply of Service to Odisha Power Transmission Corporation Ltd: AAR**

**Fact of the Case**

- The applicant M/s Tokyo Electric Power Company Service Limited (TEPSCO), a Japan based company, in association with Tokyo Electric Power Company, Holding Inc., a Japan based Company has entered into an agreement dated 13 April 2018 with an Indian entity Odisha Power Transmission Corporation Limited (OPTCL), whereby consultants have agreed to provide consultancy services to M/s Odisha Transmission System Improvement Project, Odisha, India.

The applicant has sought for a ruling as to whether the Applicant is required to be registered under Odisha Goods and Services Act, 2017 and Central Goods and Services Act, 2017 for the consultancy services provided to Odisha Power Transmission Corporation Limited (OPTCL).

**Decision of the Case**

- The Coram said that supply of service to OPTCL is not an import of service in terms section 2(11) of the IGST Act . The recipient is not, therefore, liable to pay GST on a reverse charge basis in terms of Notification No. 10/2017 – integrated Tax (Rate) dated 28.06.2017. The applicant, being the supplier of service in India, is liable to pay tax and therefore, required to take GST registration under Odisha Goods and Services Act, 2017 and Central Goods and Services Act, 2017 for the consultancy services provided to Odisha Power Transmission Corporation Limited. However, the AAR clarified that the ruling is valid subject to the provisions under Section 103(2) until and unless declared void under Section 104(1) of the GST Act.

***The Odisha Authority of Advance Ruling (AAR) ruled that no Goods and Service Tax (GST) on a reverse charge basis is applicable on Supply of service to Odisha Power Transmission Corporation Limited.***