

**GOVERNMENT OF TAMIL NADU
COMMERCIAL TAXES DEPARTMENT
OFFICE OF THE COMMISSIONER OF COMMERCIAL TAXES
EZHILAGAM, CHENNAI- 600 005**

PRESENT: Thiru S.NAGARAJAN I.A.S.,

COMMISSIONER OF STATE TAX

**Circular No. 04/2026
(PP2/GST-15/29/2023)**

Dated 22.04.2026

Sub: TNGST Act, 2017- conduct of inspection under Section 67 of the Act - Power to adjudicate as a result of inspection- certain instructions - circular issued - certain modification to the circular- for LTU taxpayers - issued - regarding.

Ref: 1. Commissioner of Commercial Taxes' circular No.13/2022-TNGST (PP2/GST-15/114/2022) dated 08.11.2022

2. Commissioner of Commercial Taxes' circular No.11/2023 (PP2/GST-15/29/2023) dated 27.05.2023

3. Commissioner of Commercial Taxes' circular No.13/2023 (PP2/GST-15/29/2023) dated 01.10.2023

4. Commissioner of Commercial Taxes, Chennai-35 Proceedings No. R1/13066475/2026 dated 06.02.2026

In the circulars first, second and third cited, instructions were issued on certain issues arising out of empowerment of inspecting officers to raise demand as adjudication officer, procedure for adjudication and also on the revenue effect fixed for adjudication by the proper officers in the cadre of Assistant Commissioners and State Tax Officers.

2) In the reference fourth cited, the number of taxpayers in Large Taxpayers Unit (LTU), Chennai has been increased from 74 to 124 by excluding 3 taxpayers from LTU and including 53 taxpayers from various divisions to LTU.

3) In this regard, the Adjudication under section 73 / section 74/ section 74A of GST Acts, 2017 in respect of LTU taxpayers lies with the Proper Officer, Deputy Commissioner (LTU). However, in respect of LTU taxpayers inspected by Intelligence Wing Officer, as per circulars mentioned in the reference first, second and third cited, the adjudication lies with Proper Officer, Assistant Commissioner (ST) / State Tax Officer,

as the case may be, based on revenue effect. As part of Ease of doing Business, it is desirable that the adjudication of the taxpayer under LTU consequent to the inspection, is also done by Deputy Commissioner (LTU) only.

4) In view of the above, it is instructed that the adjudication in respect of LTU taxpayers inspected by the Intelligence Wing shall also be done by concerned Deputy Commissioner (LTU). In this regard, the adjudication task shall be transferred by the Intelligence wing after issuance of Form GST DRC-01A and along with connected records to the concerned Deputy Commissioner (LTU).

5) In respect of LTU taxpayers where GST DRC-01 notice/ personal hearing notice has already been issued by Intelligence Wing, and pending as on date of this circular, the adjudication task shall also be transferred by the Intelligence Wing proper officer to the concerned Deputy Commissioner (LTU). In this regard, an intimation notice shall be issued by the Intelligence Wing Officer under reference number by e-mail (from Official e-mail id) to the registered e-mail id of the taxpayer, to the effect that further adjudication will be done by concerned Deputy Commissioner, (LTU).

6) The Joint Commissioner (Intelligence) shall ensure that the transfer of adjudication task to the concerned Deputy Commissioner (LTU) is done immediately along with connected records. The Additional Commissioner (Systems) shall facilitate the transfer of tasks in DRC-01A/ DRC-01/Personal Hearing stage from the Intelligence Division to the concerned Deputy Commissioner (LTU).

7) The above said modification of circular shall be applicable with immediate effect. The receipt of this circular should be acknowledged by return of post.

Sd/-S.Nagarajan
Commissioner of State Tax

To
The Joint Commissioner (LTU) and
All the Joint Commissioners (ST) Intelligence, in the State.

Copy to

1. All the Additional Commissioners, O/o the Commissioner of Commercial Taxes, Chennai
2. Director/Additional Commissioner, Commercial Taxes Staff Training Institute, Chennai -35.

3. The Additional Commissioner (Systems), Chennai 35 (to upload the same in the internet/intranet website and facilitate the transfer of DRC-01A /DRC-01 task)
4. All the Joint Commissioners (ST) (Territorial) in the State.
5. All the Joint Commissioners /Deputy Commissioners / Assistant Commissioners of the Office of the Commissioner of Commercial Taxes.
6. All the Deputy Commissioners in the State (Territorial, Intelligence and Large Taxpayers Unit)
7. Copy to all Heads of assessment circles in the State
8. Stock file / Spare.

// Forwarded by order//

San. Srinivas
22/04/2026
Joint Commissioner (P&P)

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22/04/2026