# ONE NATION, ONE ELECTION: A TEST OF FEASIBILITY

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#### **ABSTRACT**

The proposal of *One Nation, One Election* (ONOE) a synchronized electoral system for the Lok Sabha, State Assemblies, and local bodies represents one of the most debated constitutional reforms in India's recent history. Advocates claim that it could reduce electoral expenditure, enhance administrative efficiency, and stabilize governance by minimizing disruptions caused by frequent elections. Critics, however, caution that ONOE poses profound constitutional, federal, and democratic challenges, potentially undermining the autonomy of states and the foundational principle of representative government. This paper examines the historical evolution of India's electoral framework, analyses the constitutional and legal implications of implementing ONOE, and evaluates its advantages and drawbacks in light of India's federal character. Drawing upon judicial precedents, law commission reports, and comparative international models, the study aims to determine whether ONOE is a constitutionally feasible and democratically sustainable reform for India's governance structure. The paper concludes that while ONOE offers practical efficiency, its adoption requires delicate constitutional balancing to preserve India's federal and democratic integrity.

**Keywords:** One Nation One Election, Electoral Reform, Federalism, Constitutional Amendment, Democracy, Governance, India.

#### 1. INTRODUCTION

"At the bottom of all tributes paid to democracy is the little man, walking into a little booth, with a little pencil making a little cross on the little bit of paper- no amount of rhetoric or voluminous discussion can diminish the overwhelming importance of the point."

— Winston Churchill

This poignant observation by Winston Churchill underscores the foundational principle of democratic governance: the act of voting. In a democracy, sovereignty resides not in the institutions of power but in the collective will of the people, expressed most vividly through periodic elections. The Constitution of India, grounded in the ideals of justice, liberty, equality, and fraternity, institutionalizes this democratic spirit by mandating free and fair elections at regular intervals.<sup>2</sup> Through this process, the citizens of India exercise their sovereign right to choose their representatives at the Union, State, and local levels. The very act of voting affirms the participatory nature of Indian democracy, wherein each citizen contributes to shaping the governance and policy framework of the nation.<sup>3</sup>

India's electoral democracy is unique in both its scale and complexity. With an electorate exceeding 900 million voters, the country conducts the world's largest periodic democratic exercise. The existing electoral system, however, follows a staggered pattern, where elections to the Lok Sabha, State Legislative Assemblies, and local bodies occur at different intervals. This arrangement, though historically evolved, has led to a situation where some part of the country is perpetually in "election mode." The frequent imposition of the Model Code of Conduct (MCC) restricts the executive's ability to announce new policies or development schemes, thereby affecting governance continuity and administrative efficiency.

The idea of synchronizing elections popularly termed "One Nation, One Election" (ONOE) seeks to address these challenges by aligning electoral schedules for all tiers of government.<sup>7</sup> Under this proposal, elections to the Lok Sabha and all State Assemblies would be held

<sup>&</sup>lt;sup>1</sup> Winston Churchill, speech in the House of Commons, 31 October 1944.

<sup>&</sup>lt;sup>2</sup> The Constitution of India, Preamble (1950).

<sup>&</sup>lt;sup>3</sup> Constitutional Ethos: Democracy for Social and Economic Welfare, WEEKLY FOCUS, Jan. 2023, at 1.

<sup>&</sup>lt;sup>4</sup> Election Commission of India, Statistical Report on the 18th Lok Sabha Elections (2024).

<sup>&</sup>lt;sup>5</sup> Election Commission of India, *Model Code of Conduct for the Guidance of Political Parties and Candidates* (2019).

<sup>&</sup>lt;sup>6</sup> A. Shaji George, One Nation, One Election: An Analysis of the Pros and Cons of Implementing Simultaneous Elections in India, 2 Partners U. Int'l Rsch. J. 40 (2023).

<sup>&</sup>lt;sup>7</sup> Law Commission of India, One Nation, One Election: Feasibility and Challenges, 170th Report (1999).

simultaneously every five years, followed shortly by local body elections within a stipulated period, usually one hundred days.<sup>8</sup> The primary rationale behind ONOE lies in the expectation that it would reduce electoral expenditure, ensure uninterrupted governance, and enhance voter participation by limiting electoral fatigue.<sup>9</sup>

Historically, India practiced simultaneous elections during the initial decades after Independence. The first four general elections 1951–52, 1957, 1962, and 1967 were conducted concurrently for the Lok Sabha and most State Legislative Assemblies. <sup>10</sup> This synchrony was disrupted due to premature dissolutions of certain State Assemblies and the Lok Sabha, political instability, and frequent recourse to Article 356, which authorizes the imposition of President's Rule in states. <sup>11</sup> Over time, these developments led to the desynchronization of electoral cycles, creating the present fragmented pattern. <sup>12</sup>

The idea of restoring simultaneous elections has resurfaced periodically. Several expert bodies, including the Election Commission of India (1983), the Law Commission of India (1999), and the NITI Aayog (2017), have examined its feasibility and advantages. In 2024, a High-Level Committee chaired by former President Ram Nath Kovind submitted an extensive report recommending a phased approach to implement ONOE. The Committee proposed constitutional amendments particularly to Articles 83, 85, 172, and 356 to harmonize the tenures of the Union and State legislatures and to establish a common electoral roll under the supervision of the Election Commission of India.

Despite its apparent administrative appeal, ONOE raises intricate constitutional and democratic questions. Critics argue that synchronizing elections might erode the federal autonomy of states, blur the distinction between national and regional issues, and potentially centralize power in the Union government.<sup>16</sup> The challenge, therefore, lies not merely in the logistical

<sup>&</sup>lt;sup>8</sup> High-Level Committee on Simultaneous Elections, *Report on One Nation, One Election* (2024) (Chair: Ram Nath Kovind).

<sup>&</sup>lt;sup>9</sup> NITI Aayog, *Discussion Paper on Simultaneous Elections to Lok Sabha and State Legislative Assemblies* (2017).

<sup>10</sup> Election Commission of India, Report on General Elections, 1951–52 (1952).

<sup>&</sup>lt;sup>11</sup> S.R. Bommai v. Union of India, (1994) 3 SCC 1.

<sup>&</sup>lt;sup>12</sup> Sandeep, *One Nation-One Election: Possibilities and Challenges in India*, 7 Int'l J. Res. Trends & Innovation (IJRTI), Dec. 2022.

<sup>&</sup>lt;sup>13</sup> Law Commission of India, 170th Report, supra note 6.

<sup>&</sup>lt;sup>14</sup> High-Level Committee Report, supra note 7.

<sup>&</sup>lt;sup>15</sup> Nivedha Parthasarathy, One Nation One Election – A Critical Analysis, 4 DME J.L. 56 (2023).

<sup>&</sup>lt;sup>16</sup> Kesavananda Bharati v. State of Kerala, (1973) 4 SCC 225.

execution of ONOE but in reconciling its objectives with the constitutional principles of federalism, democracy, and representative governance.

This article explores the feasibility of implementing ONOE within India's constitutional framework. It examines the evolution of India's electoral system, the constitutional and legal implications of synchronized elections, and the comparative experiences of other democracies. The analysis is doctrinal in nature, drawing upon constitutional provisions, statutory enactments, judicial pronouncements, and expert committee reports. By assessing the potential benefits and risks, the paper seeks to determine whether ONOE represents a pragmatic reform or a constitutional overreach that threatens the delicate balance of India's federal democracy.<sup>17</sup>

## 2. HISTORICAL AND CONSTITUTIONAL BACKGROUND

The evolution of elections in India reflects the gradual institutionalization of democracy and the consolidation of representative governance.<sup>18</sup> The concept of public participation in decision-making has deep historical roots in India's socio-political traditions. Ancient republics such as the *Sabhas* and *Samitis* of the Vedic period embodied participatory decision-making, where collective consent was sought on matters of governance.<sup>19</sup> Similar traditions persisted through medieval times, where village panchayats functioned as decentralized units of administration and justice.<sup>20</sup>

During the colonial era, representative institutions emerged as part of the British policy of limited political inclusion. The Indian Councils Act of 1861 introduced non-official members into legislative councils, marking the first step toward consultative governance.<sup>21</sup> The subsequent Indian Councils Act of 1892 expanded legislative powers, allowing limited discussion of budgets and policy matters.<sup>22</sup> However, genuine representation was only introduced with the Indian Councils Act of 1909 (Morley–Minto Reforms), which permitted Indians to be elected to the legislative councils for the first time.<sup>23</sup>

<sup>&</sup>lt;sup>17</sup> Law Commission of India, 170th Report, supra note 6.

<sup>&</sup>lt;sup>18</sup> M. P. Jain, *Indian Constitutional Law* 134 (7th ed. 2017).

<sup>&</sup>lt;sup>19</sup> K.P. Jayaswal, *Hindu Polity: A Constitutional History of India in Hindu Times* 45 (1924).

<sup>&</sup>lt;sup>20</sup> D.D. Basu, *Introduction to the Constitution of India* 3 (25th ed. 2021).

<sup>&</sup>lt;sup>21</sup> Indian Councils Act, 1861 (24 & 25 Vict., c. 67).

<sup>&</sup>lt;sup>22</sup> Indian Councils Act, 1892 (55 & 56 Vict., c. 14).

<sup>&</sup>lt;sup>23</sup> Indian Councils Act, 1909 (9 Edw. 7, c. 4).

The constitutional evolution continued with the Government of India Act, 1919 (Montagu–Chelmsford Reforms), which introduced the concept of *diarchy*, dividing subjects between elected ministers and British administrators.<sup>24</sup> While diarchy was a limited experiment, it laid the groundwork for a bicameral legislature and provincial autonomy. The Government of India Act, 1935 further extended this process by introducing provincial autonomy and preparing the foundation for federal governance.<sup>25</sup> Under this Act, direct elections were held in 1937 for provincial legislatures, creating a model later adapted in the post-independence Constitution.<sup>26</sup>

Following independence in 1947, the Constituent Assembly of India deliberated extensively on how to institutionalize democracy through periodic and universal elections.<sup>27</sup> The framers drew inspiration from comparative constitutional models such as the United Kingdom and the United States but adapted them to India's socio-political realities. Dr. B.R. Ambedkar, in the Constituent Assembly Debates, emphasized that the stability of democratic government depended upon regular elections reflecting the will of the people. Consequently, Articles 324 to 329 were incorporated into Part XV of the Constitution, establishing the Election Commission of India (ECI) and laying the framework for the conduct of elections to Parliament and State Legislatures.<sup>28</sup>

The first general elections held in 1951–52 were a landmark in democratic history. Conducted simultaneously for the Lok Sabha and all State Legislative Assemblies, these elections symbolized India's commitment to political equality and participatory governance.<sup>29</sup>This pattern continued for the next three electoral cycles 1957, 1962, and 1967 thereby establishing the system of simultaneous elections as an integral part of the early democratic experience.<sup>30</sup>

However, this synchrony was disrupted in the late 1960s and 1970s due to the premature dissolution of several State Assemblies and the Lok Sabha.<sup>31</sup> Political instability, coalition breakdowns, and the imposition of President's Rule under Article 356 led to elections being

<sup>&</sup>lt;sup>24</sup> Government of India Act, 1919 (9 & 10 Geo. 5, c. 101).

<sup>&</sup>lt;sup>25</sup> Government of India Act, 1935 (26 Geo. 5 & 1 Edw. 8, c. 2).

<sup>&</sup>lt;sup>26</sup> B.L. Grover, A New Look at Modern Indian History 482 (2018).

<sup>&</sup>lt;sup>27</sup> Constituent Assembly Debates, Vol. IX, 22 July 1947.

<sup>&</sup>lt;sup>28</sup> The Constitution of India, arts. 324–329.

<sup>&</sup>lt;sup>29</sup> Election Commission of India, *Report on General Elections*, 1951–52 (1952).

<sup>&</sup>lt;sup>30</sup> Id

<sup>&</sup>lt;sup>31</sup> Law Commission of India, One Nation, One Election: Feasibility and Challenges, 170th Report (1999).

held at irregular intervals.<sup>32</sup> Over time, this desynchronization became entrenched, resulting in the current staggered electoral cycle.<sup>33</sup>

The Election Commission of India, in its reports, has consistently noted the administrative and financial challenges caused by frequent elections.<sup>34</sup> Continuous application of the Model Code of Conduct (MCC) during election periods has often interrupted developmental policies and delayed the execution of welfare programmes.<sup>35</sup> The Law Commission of India (1999) and NITI Aayog (2017) have also acknowledged that while simultaneous elections may streamline governance, their reintroduction would require significant constitutional amendments and political consensus.<sup>36</sup>

Constitutionally, the tenure of the Lok Sabha and the State Legislative Assemblies is fixed at five years, as provided under Articles 83(2) and 172(1) of the Constitution.<sup>37</sup> However, premature dissolution or extension of tenure in extraordinary circumstances under Articles 85 and 356 has created deviations from this synchrony.<sup>38</sup> Furthermore, the Representation of the People Act, 1951 provides the procedural framework for conducting elections but does not mandate a uniform electoral calendar.<sup>39</sup> Therefore, restoring simultaneous elections would necessitate amending these provisions to ensure uniformity in electoral cycles while preserving constitutional principles of federalism and representative democracy.<sup>40</sup>

Historically, simultaneous elections contributed to administrative efficiency and fiscal prudence, but they also reflected the relatively stable political environment of the early decades after independence.<sup>41</sup> The fragmentation of the party system and the emergence of coalition politics after the 1970s made such uniformity difficult to maintain.<sup>42</sup> As the political landscape diversified, the electoral process evolved to reflect India's pluralistic democracy. While the idea of "One Nation, One Election" seeks to recapture the efficiency of the past, its

<sup>&</sup>lt;sup>32</sup> S.R. Bommai v. Union of India, (1994) 3 SCC 1.

<sup>&</sup>lt;sup>33</sup> Id.

<sup>&</sup>lt;sup>34</sup> Election Commission of India, *Annual Report* (2018).

<sup>&</sup>lt;sup>35</sup> Election Commission of India, *Model Code of Conduct for the Guidance of Political Parties and Candidates* (2019).

<sup>&</sup>lt;sup>36</sup> NITI Aayog, Discussion Paper on Simultaneous Elections to Lok Sabha and State Legislative Assemblies (2017).

<sup>&</sup>lt;sup>37</sup> The Constitution of India, arts. 83(2), 172(1).

<sup>&</sup>lt;sup>38</sup> Id. arts. 85, 356.

<sup>&</sup>lt;sup>39</sup> Representation of the People Act, 1951 (43 of 1951).

<sup>&</sup>lt;sup>40</sup> Law Commission of India, 170th Report, supra note 15.

<sup>&</sup>lt;sup>41</sup> Election Commission of India, Report on General Elections, 1967 (1968).

<sup>&</sup>lt;sup>42</sup> Christophe Jaffrelot, *India's Silent Revolution: The Rise of the Lower Castes in North India* 312 (2003).

implementation in the present federal framework raises complex constitutional and political considerations that require careful scrutiny.<sup>43</sup>

### 3. CONCEPT AND SCOPE OF ONE NATION, ONE ELECTION

The phrase "One Nation, One Election" (ONOE) denotes the idea of conducting elections to the Lok Sabha, State Legislative Assemblies, and, in a later phase, local bodies, within a single or closely synchronized time frame.<sup>44</sup> The underlying premise of this concept is the establishment of a uniform electoral cycle to minimize the frequency of elections and the administrative disruptions caused by recurrent electoral exercises.<sup>45</sup>

At its core, ONOE seeks to promote political and administrative stability by ensuring that elected governments at all levels function for their full constitutional term without the interference of continuous election cycles.<sup>46</sup> The Election Commission of India (ECI) has noted that the recurrent invocation of the Model Code of Conduct (MCC) during elections hampers the normal decision-making of both the Union and State governments, delaying policy implementation and developmental projects. Synchronization of elections, therefore, is envisaged as a measure to enhance governance efficiency and policy continuity.<sup>47</sup>

The concept is not entirely novel. India's first four general elections between 1951–52 and 1967 were conducted simultaneously for the Lok Sabha and most State Assemblies. 48 However, following the dissolution of the Lok Sabha in 1970 and certain State Assemblies earlier, this alignment was lost, leading to the staggered electoral cycle prevalent today. 49 The ONOE proposal, therefore, is essentially a plan to restore the synchrony that once existed within India's democratic framework. 50

<sup>&</sup>lt;sup>43</sup> High-Level Committee on Simultaneous Elections, *Report on One Nation, One Election* (2024) (Chair: Ram Nath Kovind).

<sup>&</sup>lt;sup>44</sup> Law Commission of India, *One Nation, One Election: Feasibility and Challenges*, 170th Report (1999).

<sup>&</sup>lt;sup>45</sup> NITI Aayog, *Discussion Paper on Simultaneous Elections to Lok Sabha and State Legislative Assemblies* (2017).

<sup>&</sup>lt;sup>46</sup> Election Commission of India, Model Code of Conduct for the Guidance of Political Parties and Candidates (2019)

<sup>&</sup>lt;sup>47</sup> Law Commission of India, 170th Report, supra note 1.

<sup>&</sup>lt;sup>48</sup> Election Commission of India, Report on General Elections, 1951–52 (1952).

<sup>&</sup>lt;sup>49</sup> Ekta Basoya, *One Nation, One Election: Analyzing the Impact on Indian Polity*, 10 J. Emerging Tech. & Innovative Res. 645 (2023).

<sup>&</sup>lt;sup>50</sup> Dr. Eranna, Exploring the Managerial Challenges in Implementing 'One Nation, One Election' in India, 5 SHODHKOSH: J. VISUAL & PERFORMING ARTS 414 (2024)

Several committees and commissions have examined the feasibility of simultaneous elections. The Law Commission of India, in its 170th Report (1999), highlighted that frequent elections consume considerable time, energy, and public funds, and that simultaneous elections could strengthen governance by reducing these inefficiencies.<sup>51</sup> Likewise, the NITI Aayog Discussion Paper (2017) proposed two models: a complete synchronization model, where all elections are held together once every five years, and a two-phase model, where elections are held twice in a five-year cycle to accommodate practical contingencies.<sup>52</sup>

The most comprehensive analysis came from the High-Level Committee on Simultaneous Elections (2024), chaired by former President Ram Nath Kovind.<sup>53</sup> The Committee recommended a phased implementation beginning with the synchronization of Lok Sabha and State Assembly elections, followed by the alignment of local body elections within one hundred days of national and state polls.<sup>54</sup> It also suggested constitutional amendments to Articles 83, 85, 172, 174, and 356 to ensure uniform tenure and provide mechanisms for continuity in case of premature dissolution.<sup>55</sup>

From a constitutional standpoint, ONOE requires harmonization between the Union and State election cycles, which may necessitate temporary extensions or curtailments of legislative terms.<sup>56</sup> This adjustment, though technically feasible under Article 368, raises questions regarding political consensus and adherence to the basic structure doctrine, particularly the federal principle.<sup>57</sup>

The proposed scope of ONOE is thus two-fold: first, to reduce the financial and administrative burden on the exchequer by conducting elections in one or two consolidated phases; and second, to promote governance stability by minimizing disruptions caused by recurrent election cycles. Proponents argue that the reform would encourage long-term policymaking and curtail populist schemes that often dominate fragmented election timelines.<sup>58</sup> However, its scope

<sup>&</sup>lt;sup>51</sup> Sandeep Phukan, *Simultaneous Polls Plan Gets Union Cabinet Approval*, THE HINDU (Sept. 19, 2024, 10:25 AM IST).

<sup>&</sup>lt;sup>52</sup> Akram Pasha, *The Idea of Democracy in Social, Economic and Political Institutions of Ancient India: An Overview*, 6 J. Res. Human. & Soc. Sci. 81 (2018)

<sup>&</sup>lt;sup>53</sup> Annaiah Tailur, Democratic Institutions in Ancient India, 7 Int'l J. Creative Res. Thoughts 683 (2019)

<sup>&</sup>lt;sup>54</sup> V. S. Rama Devi & S. K. Mendiratta, *How India Votes: Election Laws, Practice and Procedure* 3–4 (3d ed. LexisNexis 2014).

<sup>&</sup>lt;sup>55</sup> Report on the First General Elections in India 1951–52. By the Election Commission, India. New Delhi: Government of India Press, 1955. 2 vols., 249, 889.

<sup>&</sup>lt;sup>56</sup> Shiva Rao, *The Framing of India's Constitution: A Study* 13 (21st ed. 2014).

<sup>&</sup>lt;sup>57</sup> Kesavananda Bharati v. State of Kerala, (1973) 4 SCC 225.

<sup>&</sup>lt;sup>58</sup> Anand Ballabh Kafaltiya, *Democracy and Election Laws* 62 (Deep & Deep Publ'ns Pvt. Ltd., 2023).

extends beyond mere logistical convenience it calls for a constitutional recalibration of India's democratic process, balancing administrative efficiency with the federal distribution of power.<sup>59</sup>

In summary, ONOE represents a vision of synchronized democracy where the rhythm of electoral politics aligns with the rhythm of governance. While its conceptual appeal is strong, its operationalization depends upon complex constitutional, political, and institutional realignments that must preserve the core values of Indian federalism and representative democracy.

## 4. MERITS OF ONE NATION, ONE ELECTION

The proposal of One Nation, One Election (ONOE) has generated substantial debate in India's constitutional and political discourse. While concerns about feasibility persist, proponents of the idea argue that synchronized elections offer a wide range of administrative, fiscal, and democratic benefits. These advantages primarily revolve around reducing electoral costs, improving governance stability, enhancing voter participation, and minimizing the disruptions caused by frequent election cycles.<sup>60</sup>

## 4.1 Cost Efficiency and Financial Prudence

Conducting elections is an expensive exercise involving vast logistical and administrative machinery. Separate elections for the Lok Sabha, State Assemblies, and local bodies require repeated deployment of security personnel, polling staff, and electronic voting infrastructure. <sup>61</sup>The Election Commission of India (ECI) has consistently emphasized that the growing frequency of elections results in mounting financial burdens on both the government and political parties. <sup>62</sup>

According to the NITI Aayog Discussion Paper (2017), the total expenditure incurred during the 2014 General Elections exceeded ₹3,870 crore, excluding the costs borne by State governments and political parties. In addition, the Centre for Media Studies (CMS) estimated

<sup>&</sup>lt;sup>59</sup>High-Level Committee on Simultaneous Elections, *Report*, supra note 11.

<sup>&</sup>lt;sup>60</sup> Bibek Debroy & Kishore Desai, Analysis of Simultaneous Elections: The "What", "Why" and "How" – A Discussion Paper 12 (NITI Aayog, Jan. 2017),

<sup>&</sup>lt;sup>61</sup> Pradeep Dubey & Siddhartha Sahi, *Simultaneous Elections Make Single-Party Sweeps More Likely*, arXiv preprint arXiv:2503.01663v1 (2025)

<sup>&</sup>lt;sup>62</sup> Election Commission of India, *Voters Information* (Oct. 2019), https://eci.gov.in/files/file/10975-10-votersinformation/ (last visited June 15, 2020).

that electoral spending in India rose to nearly ₹60,000 crore during the 2019 General Elections, making it one of the most expensive electoral processes in the world. Proponents of ONOE contend that a unified electoral cycle could dramatically reduce these expenditures by consolidating resource utilization and minimizing redundant expenses.<sup>63</sup>

Furthermore, political parties spend enormous amounts on campaigning, rallies, and advertising during each electoral event. Simultaneous elections would streamline campaign activities, potentially reducing unregulated spending and the influence of money in politics. The Law Commission of India has argued that synchronized elections could contribute to greater financial transparency and allow electoral authorities to enforce expenditure ceilings more effectively.

#### 4.2 Administrative and Security Efficiency

Frequent elections also create substantial administrative strain. Each electoral event requires extensive deployment of government officials, teachers, and police personnel, diverting them from their regular duties. Security forces are mobilized repeatedly to ensure law and order during elections, stretching administrative resources thin.

By contrast, simultaneous elections would allow for more efficient deployment of administrative and security personnel, as resources could be planned and mobilized once every five years rather than multiple times. This would not only reduce logistical fatigue but also enable better coordination between central and state agencies. The High-Level Committee (2024) observed that simultaneous elections would strengthen institutional coordination and reduce the burden on the Election Commission, which currently faces the daunting task of organizing several elections each year.<sup>64</sup>

### 4.3 Reduction in Model Code of Conduct (MCC) Disruptions

The Model Code of Conduct (MCC) plays an essential role in ensuring fair elections, but its frequent imposition due to continuous elections significantly disrupts governance. Once the MCC is enforced, the government is prohibited from announcing new policies, initiating public

<sup>&</sup>lt;sup>63</sup> Dr. Sapna Chadah, *Theme Paper on "One Nation, One Election"*, Sixty-Eighth Members' Annual Conference, Indian Inst. of Pub. Admin., New Delhi, 50–52 (2024).

<sup>&</sup>lt;sup>64</sup> Ministry of Law & Just., *One Nation, One Election*, PIB (Dec. 17, 2024), https://www.pib.gov.in/PressReleaseIframePage.aspx?PRID=2085082.

welfare projects, or making key administrative decisions until elections conclude. In a country where some state or local election is almost always underway, this effectively places parts of the government in a perpetual state of policy paralysis.

# 4.4 Governance Stability and Continuity

Political stability is another significant merit of ONOE. Frequent elections often compel governments to focus on short-term populist measures aimed at electoral gains rather than on long-term developmental strategies. With simultaneous elections, governments would have longer uninterrupted tenures, enabling consistent policy planning and execution.

The Law Commission of India (1999) opined that synchronized elections would "foster accountability and efficiency by providing the government adequate time to implement its legislative and administrative agenda." Moreover, a common electoral cycle would reduce the likelihood of mid-term political upheavals that destabilize governance and hinder economic progress.<sup>65</sup>

#### **4.5 Enhanced Voter Participation**

Simultaneous elections could also improve voter turnout by reducing "voter fatigue." Repeated elections often lead to declining participation rates as citizens lose interest in frequent polling. Consolidating elections into a single or two-phase process could enhance public enthusiasm and awareness, especially in rural and remote regions.<sup>66</sup>

The Election Commission of India (1952–2024) has observed that voter participation tends to be higher when multiple elections coincide, as the combined political mobilization draws greater public interest. A single consolidated electoral event would thus strengthen the participatory nature of democracy and reaffirm the sovereignty of the electorate.<sup>67</sup>

### 4.6 Strengthening the Electoral Process

Finally, ONOE could enhance the integrity of India's electoral process. Simultaneous elections

<sup>&</sup>lt;sup>65</sup> Bibek Debroy & Kishore Desai, A Discussion Paper on Analysis of Simultaneous Elections: The "What", "Why" and "How", NITI Aayog, https://www.spmrf.org/wp-content/uploads/2020/12/Note-on-Simultaneous-Elections.pdf

<sup>&</sup>lt;sup>66</sup> Eesha Shrotriya & Shantanu Pachauri, *Simultaneous Elections and Flexible Legislative Terms: A Constitutionally Preferable Approach*, 5 Indian L. Rev. 106, 106–38 (2021)

PRS Legislative Research, Draft Report on Simultaneous Elections, PRS India, https://prsindia.org/policy/report-summaries/draft-report-simultaneous-elections

would enable the Election Commission to allocate its resources human, technological, and financial more efficiently. A synchronized cycle would facilitate the modernization of electoral logistics, better maintenance of electronic voting machines (EVMs), and improved transparency in vote counting.

Furthermore, with fewer elections, the media and civil society could focus more deeply on substantive policy debates rather than continuous campaign coverage. The overall effect would be a more informed electorate and a more accountable political system.

In sum, the potential merits of ONOE cost efficiency, administrative simplification, reduced policy disruptions, and strengthened governance reflect its underlying intent: to harmonize India's democratic process with effective governance. However, as subsequent sections will show, these advantages must be balanced against the constitutional, legal, and political challenges that accompany the proposal.

#### 5. DEMERITS AND CHALLENGES OF ONE NATION, ONE ELECTION

While the proposal for One Nation, One Election (ONOE) promises administrative and financial efficiency, its implementation invites a range of constitutional, legal, political, and practical difficulties. These challenges strike at the core of India's federal and democratic structure, questioning whether such a reform can be accomplished without compromising the Constitution's basic features.<sup>68</sup>

## 5.1 Constitutional and Legal Complexities

The foremost challenge lies in reconciling ONOE with the constitutional design of India's parliamentary democracy. The tenure of the Lok Sabha and State Legislative Assemblies is governed by Articles 83(2) and 172(1) of the Constitution, which fix a five-year term "unless sooner dissolved." Implementing ONOE would require harmonizing these tenures, necessitating either the extension or curtailment of certain legislative terms both of which demand constitutional amendment under Article 368.<sup>69</sup>

<sup>&</sup>lt;sup>68</sup> Kesavananda Bharati v. State of Kerala, (1973) 4 SCC 225.

<sup>&</sup>lt;sup>69</sup> Amit Singh, *One Nation One Election: Constitutional Challenges*, Legal Service India (Mar. – Apr. 2020), https://www.legalserviceindia.com/legal/article-1763-one-nation-one-election-constitutional-challenges.html.

Moreover, provisions such as Articles 85, 174, and 356 empower the President and Governors to dissolve legislatures or impose President's Rule under specified circumstances. Synchronization would therefore restrict the exercise of these constitutional powers or demand intricate amendment to regulate their future use. The Law Commission of India (1999) observed that achieving simultaneous elections would entail amendments not only to the Constitution but also to the Representation of the People Acts, 1950 and 1951, and the Rules of Procedure of both Houses of Parliament.<sup>70</sup>

## 5.2 Threats to Federalism and State Autonomy

India's Constitution embodies co-operative federalism, balancing unity with diversity.<sup>71</sup> Under ONOE, however, simultaneous elections risk over-centralizing the political process. National issues may dominate electoral discourse, marginalizing regional parties and state-specific concerns. Smaller states could lose political visibility as nationwide campaigns emphasize central leadership and national policy agendas.

In *S.R. Bommai v. Union of India*, the Supreme Court reaffirmed that federalism is part of the Constitution's basic structure and that State governments derive authority directly from the Constitution, not from the Union.<sup>72</sup> Any scheme that synchronizes state elections with parliamentary polls may therefore undermine this autonomy by effectively subordinating state politics to national timelines. The High-Level Committee (2024) acknowledged this risk, suggesting that synchronization must respect the federal character and preserve states' constitutional independence.

#### **5.3 Practical and Political Feasibility**

Beyond constitutional hurdles, ONOE presents formidable political and logistical obstacles. India's vast and diverse electorate, spread across 28 States and 8 Union Territories, poses practical difficulties in organizing simultaneous polls. The Election Commission would need to deploy millions of officials and security personnel, and maintain adequate stocks of electronic voting machines (EVMs) and VVPATs to cover all constituencies concurrently.

<sup>&</sup>lt;sup>70</sup> Ajayraj Singh & Sonal Jain, Constitutional Aspects and Challenges for Implementing One Nation One Election, 7 Int'l J.L. Mgmt. & Human. 1567 (2024)

<sup>&</sup>lt;sup>71</sup> D.D. Basu, *Introduction to the Constitution of India* 89 (25th ed. 2021).

<sup>&</sup>lt;sup>72</sup> S.R. Bommai v. Union of India, (1994) 3 SCC 1.

#### 5.4 Misuse of Article 356 and Constructive No-Confidence Motions

ONOE also risks distorting the constitutional balance governing dissolution and confidence of legislatures. To maintain synchrony, mechanisms such as "constructive no-confidence motions" have been proposed where a government may only be removed if an alternative majority is simultaneously formed. Though this concept operates in Germany and Spain, its transplantation into India's parliamentary system may curtail legislative accountability.

Furthermore, there is apprehension that Article 356 could be invoked more frequently to dissolve State Assemblies prematurely to preserve synchronization, thereby undermining state autonomy. In *S.R. Bommai*, the Court warned against the political misuse of Article 356, emphasizing that President's Rule must remain an exceptional measure. ONOE, by institutionalizing synchronized dissolution, might inadvertently normalize this extraordinary provision.<sup>73</sup>

#### 5.5 Judicial and Institutional Challenges

The judiciary would inevitably play a crucial role in reviewing constitutional amendments and electoral procedures related to ONOE.<sup>74</sup> The Supreme Court has consistently maintained that free and fair elections form part of the Constitution's basic structure. Any alteration perceived as compromising electoral freedom or equality of representation may invite constitutional challenge.<sup>75</sup>

#### 5.6 Democratic Representation and Voter Behaviour

Another concern is the potential distortion of voter behaviour. Empirical studies of past simultaneous elections reveal that national issues tend to overshadow regional ones, leading to uniform voting patterns across levels of government. This "bandwagon effect" could weaken political pluralism and limit the representation of regional aspirations. Scholars argue that India's multi-party system thrives on staggered elections, which allow regional voices to influence national policy at different points in time.<sup>76</sup>

<sup>&</sup>lt;sup>73</sup> Kapil Sibal, One Nation, One Election against basic structure of Constitution, The Hindu (July 8, 2025),

<sup>&</sup>lt;sup>74</sup> Mohinder Singh Gill v. Chief Election Commissioner, (1978) 1 SCC 405.

<sup>75</sup> M. Bansal, *The Concept of One Nation One Election: An Analysis from Indian Perspective*, 22(4) Think India (2019)

<sup>&</sup>lt;sup>76</sup> Christophe Jaffrelot, *The Indian Party System* (2020).

# 6. COMPARATIVE PERSPECTIVES: GLOBAL EXPERIENCES WITH SIMULTANEOUS ELECTIONS

The idea of synchronized elections is not unique to India. Several democracies across the world conduct national and subnational elections either simultaneously or within a narrowly defined electoral window. A comparative examination of these systems provides insight into how synchronization affects governance, voter behaviour, and administrative efficiency. However, the adaptability of these models to India's federal parliamentary structure must be evaluated with caution, as political systems and constitutional arrangements differ significantly.

#### **6.1 The United States: Federal Decentralization**

The United States follows a highly decentralized electoral system. Elections for federal, state, and local offices occur at various intervals, often overlapping but not fully synchronized. Federal elections for the President, the House of Representatives, and one-third of the Senate are held every two and four years, respectively, while gubernatorial and state legislative elections follow independent schedules. This fragmentation reflects the principle of dual sovereignty, where both federal and state governments derive authority directly from their constitutions.<sup>77</sup>

Although elections are not simultaneous nationwide, the American experience demonstrates that frequent elections are considered integral to accountability and democratic responsiveness. Efforts to synchronize state and federal elections have been largely resisted to preserve local autonomy and political diversity. Hence, while the U.S. system accommodates administrative efficiency through predictable electoral calendars, it values decentralization over synchronization.<sup>78</sup>

### 6.2 The United Kingdom: Parliamentary Synchrony with Flexibility

In the United Kingdom, national and local elections are governed by different statutes and timeframes. The Fixed-term Parliaments Act, 2011, originally prescribed a five-year term for the House of Commons but was repealed by the Dissolution and Calling of Parliament Act,

<sup>&</sup>lt;sup>77</sup> Karl Evers-Hillstrom, *Most Expensive Ever: 2020 Election Cost \$14.4 Billion*, OpenSecrets News & Analysis (Feb. 11, 2021), https://www.opensecrets.org/news/2021/02/2020-cycle-cost-14p4-billiondoubling-16/.

<sup>&</sup>lt;sup>78</sup> M. T. Hartney & S. D. Hayes, *Off-Cycle and Out of Sync: How Election Timing Influences Political Representation*, State Pol. & Pol'y Q. (forthcoming 2021)

2022, restoring the Prime Minister's discretion to call elections. Local council and devolved legislature elections in Scotland, Wales, and Northern Ireland follow distinct cycles.<sup>79</sup>

The British system thus embodies a flexible synchrony, balancing administrative convenience with political autonomy. Although occasional coincidences occur such as simultaneous general and devolved elections complete synchronization is avoided to prevent overcentralization of political discourse.

## 6.3 South Africa: Structured Simultaneity under a Unitary Framework

South Africa offers one of the most coherent models of synchronized elections. The Constitution of the Republic of South Africa, 1996, provides for simultaneous elections to the National Assembly and provincial legislatures, which are held every five years under the supervision of the Independent Electoral Commission. The uniform electoral cycle promotes administrative efficiency and cost savings<sup>80</sup>.

However, municipal elections in South Africa occur separately, typically two years after national and provincial elections. This staggered approach prevents voter fatigue and allows mid-term evaluation of government performance. The South African model thus achieves partial synchrony while preserving multi-level democratic participation.<sup>81</sup>

### 6.4 Sweden and Germany: Parliamentary Coordination in Multi-Level Democracies

Sweden conducts simultaneous elections for the Riksdag (national legislature), county councils, and municipal assemblies every four years. This uniform schedule enhances administrative coordination and voter participation, with turnout often exceeding 85%. The Swedish system succeeds due to its unitary structure and high civic literacy, which facilitate efficient electoral management.

In contrast, Germany a federal republic adopts a semi-synchronized system. Elections for the Bundestag (federal parliament) are held every four years, while Länder (state) elections follow independent cycles. However, several German states voluntarily align their electoral calendars

<sup>&</sup>lt;sup>79</sup> Law Commission of India, Draft Report on Simultaneous Elections (Aug. 30, 2018)

<sup>80</sup> Republic of South Africa, Government System

<sup>81</sup> Constitution of the Republic of South Africa, 1996, §§ 46(1)(d), 105(1)(d).

with national polls to optimize resource use. This voluntary synchronization demonstrates cooperative federalism rather than constitutional compulsion.

#### 6.5 Indonesia and the Philippines: Presidential Synchronization

Among Asian democracies, Indonesia and the Philippines have experimented with simultaneous elections under presidential systems. Indonesia conducts unified elections for the President, House of Representatives (DPR), and Regional Representatives Council (DPD) every five years. The consolidation of elections after the 2019 reforms aimed to reduce costs and simplify administration.<sup>82</sup>

The Philippines holds elections for the President, Vice-President, and Congress simultaneously every six years, with mid-term local elections occurring in between. The system fosters efficiency but also risks overwhelming voters with lengthy ballots and numerous candidates.<sup>83</sup> Both countries demonstrate that synchronization in presidential systems can succeed where executive and legislative terms are constitutionally fixed, but such a model may not easily translate into India's parliamentary federalism.

#### 6.6 Comparative Lessons for India

The comparative review reveals that while synchronized elections can improve administrative efficiency and reduce fiscal burdens, their success depends on the constitutional structure and political culture of each country. In unitary or presidential systems, synchronization is facilitated by fixed executive terms and centralized electoral management. In contrast, federations like the U.S. and Germany preserve staggered elections to maintain subnational autonomy.

For India, whose Constitution enshrines parliamentary federalism, any move toward ONOE must reconcile uniformity with diversity. Adapting global experiences requires tailoring synchronization to India's constitutional context, ensuring that administrative efficiency does not erode the federal balance or weaken democratic pluralism.<sup>84</sup>

<sup>82</sup> Robert W. Hefner ed., Routledge Handbook of Contemporary Indonesia (Routledge 2020).

<sup>&</sup>lt;sup>83</sup> Maneesh Kumar, Federal Implications of One Nation One Election Model in India, 7 *Int'l J. of Pol. Sci. & Gov't* 136 (2025).

<sup>&</sup>lt;sup>84</sup> Yogendra Yadav, Why Simultaneous Elections Are Bad for India's Democracy, Hindustan Times (May 16, 2018).

#### 7. CRITICAL ASSESSMENT AND DISCUSSION

The proposal for One Nation, One Election (ONOE) must be evaluated not merely as an administrative reform but as a constitutional restructuring of India's democratic architecture. The idea, while appealing in theory, must be weighed against the principles of federalism, separation of powers, and democratic representation, which constitute the foundation of India's constitutional order.

# 7.1 Balancing Efficiency and Constitutionalism

Proponents of ONOE contend that simultaneous elections would ensure policy continuity, reduce public expenditure, and enhance governance stability. However, constitutional governance is not solely measured by administrative efficiency but by adherence to democratic norms and constitutional principles. As *Justice Khanna* observed in *Kesavananda Bharati v. State of Kerala*, constitutional amendments cannot sacrifice essential democratic values for expediency.

Synchronizing elections requires modifications to Articles 83, 85, 172, and 356 of the Constitution provisions intricately linked to the separation of powers between the Union and the States. The danger lies in treating political efficiency as a substitute for constitutionalism. Effective governance must emerge within, not outside, the constitutional framework.

Moreover, the Law Commission of India (1999) and the High-Level Committee (2024) have both emphasized that ONOE can be implemented only through broad-based political consensus rather than unilateral executive action. Without such consensus, the reform risks being perceived as politically motivated, potentially undermining its legitimacy and judicial sustainability.

### 7.2 Democratic Representation and Voter Behaviour

Democratic representation in India thrives on diversity and pluralism. The staggering of elections allows regional and local issues to find space within the political discourse. Empirical research by the Election Commission of India shows that simultaneous elections often lead to "vote uniformity", where national parties gain disproportionate influence across levels of governance.

This phenomenon, sometimes called the "bandwagon effect," may suppress regional aspirations and reduce the political space available to smaller parties. The federal scheme under the Constitution was designed precisely to avoid such concentration of power, ensuring that both national and state governments derive their mandate independently. Implementing ONOE without institutional safeguards could, therefore, erode political pluralism and weaken the representative nature of democracy.<sup>85</sup>

## 7.3 Federalism and Constitutional Morality

Federalism is not merely an administrative division of powers but a constitutional guarantee of state autonomy. The Supreme Court in *S.R. Bommai v. Union of India* affirmed that federalism forms part of the Constitution's basic structure, safeguarding the equality and dignity of the States. ONOE, by aligning all elections under a single national schedule, risks subordinating state politics to national concerns.<sup>86</sup>

This centralization contradicts the spirit of constitutional morality, a doctrine articulated by *Dr. B.R. Ambedkar*, which demands that all institutions respect the balance of power envisioned by the Constitution. Any attempt to impose uniformity across diverse political landscapes may compromise this delicate balance. As *Justice Lokur* later noted, constitutional morality requires not the supremacy of one level of government over another, but mutual respect within the federation.

# 7.4 Feasibility within the Doctrinal Framework

From a doctrinal standpoint, ONOE can only be achieved through constitutional amendment. Article 368 requires ratification by at least one-half of the State Legislatures for amendments affecting the distribution of powers between the Union and the States. Given the political heterogeneity of India, securing such ratification poses a formidable challenge.

Additionally, logistical constraints such as the availability of voting equipment, security personnel, and polling infrastructure must be addressed before contemplating a synchronized electoral cycle. As the Election Commission of India (2024) observed, any disruption caused

<sup>&</sup>lt;sup>85</sup> Sugato Dasgupta et al., *Coordinated Voting in Sequential and Simultaneous Elections: Some Experimental Evidence*, 11 Experimental Econ. 315 (2007).

<sup>&</sup>lt;sup>86</sup> NITI Aayog, *Discussion Paper on Simultaneous Elections to Lok Sabha and State Legislative Assemblies* (2017).

by natural calamities or legal disputes could derail the entire election schedule, jeopardizing the legitimacy of the process.<sup>87</sup>

Therefore, the test of feasibility must consider not only constitutional permissibility but also administrative preparedness, judicial safeguards, and political inclusivity.<sup>88</sup>

#### 7.5 Towards a Balanced Reform

Rather than pursuing absolute synchronization, a phased or partial model may offer a more practical approach.<sup>89</sup> The NITI Aayog (2017) proposed a two-phase electoral schedule, combining Lok Sabha elections with those of half the States, followed by the remainder two and a half years later.<sup>90</sup> This model preserves periodic accountability while reducing the frequency of electoral disruptions.

The High-Level Committee (2024) also suggested that synchronization should be implemented gradually, starting with coordination between Lok Sabha and select State elections.<sup>91</sup> This approach would enable institutional adaptation without constitutional overreach.

Ultimately, ONOE's viability depends upon reconciling efficiency with constitutionalism.<sup>34</sup> The reform must strengthen, not strain, India's federal democracy.<sup>35</sup> The objective should not be uniformity for its own sake, but harmony between governance efficiency and constitutional integrity.<sup>92</sup>

#### 8. CONCLUSION

The proposal for "One Nation, One Election" (ONOE) represents an ambitious effort to streamline India's electoral process by synchronising elections to the Lok Sabha and State Legislative Assemblies. It arises from legitimate administrative and economic concerns most notably, the escalating cost of frequent elections, the recurrent enforcement of the Model Code of Conduct that disrupts policy continuity, and the continual diversion of administrative

<sup>&</sup>lt;sup>87</sup> M. Bansal, *The Concept of One Nation One Election: An Analysis from Indian Perspective*, 22 Think India J. 3077 (2019).

<sup>&</sup>lt;sup>88</sup> Maneesh Kumar, Federal Implications of One Nation One Election Model in India, 7 Int'l J. of Pol. Sci. & Gov't 136 (2025).

<sup>&</sup>lt;sup>89</sup> Pramod Yadav, Binika Durgam & Agnish Dev, *One Nation, One Election (ONOE) in India: Examining the Impact on Democracy, Governance, and Development*, 14 Int'l Res. J. Mgmt. Soc. & Human. 75 (2023).

<sup>&</sup>lt;sup>90</sup> Shivani, One Nation One Election: A New Electoral Reform in India, 24 Supremo Amicus (2021).

<sup>&</sup>lt;sup>92</sup> P. Bhagat & M.P. Pokharyal, Conceptual Reforms One Nation—One Election, 19 İlköğretim Online 3929 (2020).

machinery towards election management. While these motivations are pragmatic, the feasibility of ONOE must be critically assessed within India's constitutional and federal framework.

Historically, simultaneous elections were conducted from 1951–52 until 1967, when India's democratic institutions were still in formative stages. This synchrony collapsed due to premature dissolutions of legislatures, the imposition of President's Rule under Article 356, and the rise of coalition and multi-party federalism. Reinstating synchronised elections in such a politically diverse federation would require substantial constitutional amendments to Articles 83, 85, 172, and 174, which govern the duration and dissolution of legislatures. <sup>93</sup> Such amendments, under Article 368, would necessitate ratification by at least half of the states, thereby demanding an unprecedented degree of political consensus. <sup>94</sup> These structural changes also raise profound constitutional questions under the Basic Structure Doctrine, as articulated in *Kesavananda Bharati v. State of Kerala*, which enshrines federalism and representative democracy as inviolable features of the Constitution. Any alteration that extends or curtails legislative tenures to achieve electoral uniformity risks infringing upon these core constitutional values.

From a constitutional standpoint, ONOE challenges the equilibrium between administrative convenience and democratic pluralism. The uniformity it seeks may inadvertently erode state autonomy by compelling all State governments to conform to a centralised electoral calendar, thereby diminishing their ability to represent regional aspirations. The Supreme Court in *S.R. Bommai v. Union of India* reaffirmed that federalism is integral to the Constitution's basic structure and cannot be diluted for political or administrative expediency. Thus, any model that subordinates state sovereignty to national uniformity must be approached with constitutional restraint.

The democratic implications of ONOE are equally significant. Elections are not merely procedural rituals but moments of democratic renewal opportunities for citizens to hold

<sup>&</sup>lt;sup>93</sup> Nivedha Parthasarathy, One Nation One Election – A Critical Analysis, 4 DME J.L. 56 (2023).

<sup>&</sup>lt;sup>94</sup> A.K. Kaushik & Y. Goyal, *The Desirability of One Nation One Election in India: Simultaneous Elections*, 44 J. Soc. Pol. & Econ. Stud. 110 (2019).

<sup>&</sup>lt;sup>95</sup> A. Shaji George, One Nation, One Election: An Analysis of the Pros and Cons of Implementing Simultaneous Elections in India, 2 Partners U. Int'l Rsch. J. 40 (2023).

<sup>&</sup>lt;sup>96</sup> Ajayraj Singh & Sonal Jain, Constitutional Aspects and Challenges for Implementing One Nation One Election, 7 Int'l J.L. Mgmt. & Human. 1567 (2024).

<sup>97</sup> Amit Singh, One Nation One Election: Constitutional Challenges, Legal Serv. India (Mar.–Apr. 2020)

governments accountable at regular intervals. Although frequent elections may impose financial and logistical burdens, they also ensure continuous accountability and decentralisation of power.<sup>13</sup> A unified electoral cycle could nationalise political discourse, marginalising regional parties and silencing local concerns.<sup>98</sup> Comparative experiences from federal systems such as Germany and Canada indicate that synchronised elections often advantage dominant national parties while reducing the visibility of regional and issue-based movements.<sup>99</sup> India's political diversity rooted in linguistic, cultural, and socio-economic heterogeneity requires an electoral framework that accommodates this diversity rather than homogenising it.

In essence, while ONOE aspires to enhance administrative efficiency and reduce fiscal strain, its constitutional and democratic ramifications outweigh its procedural advantages. The reform, in its current conception, is not feasible without risking damage to the foundational pillars of federalism and representative democracy. Any meaningful electoral reform must therefore proceed incrementally and consensually by clustering elections within broader timeframes, improving mechanisms for expenditure regulation, and strengthening electoral transparency rather than enforcing absolute synchronisation. Only through such constitutionally sensitive and participatory reform can India preserve both the vitality of its democracy and the integrity of its federal structure. <sup>101</sup>

<sup>&</sup>lt;sup>98</sup> One Nation, One Election: A Report, NITI Aayog Discussion Paper (Aug. 2017),

<sup>&</sup>lt;sup>99</sup> Dep't-Related Parliamentary Standing Comm. on Pers., Pub. Grievances, Law & Just., Rajya Sabha, 79th Report on Feasibility of Holding Simultaneous Elections to the House of People (Lok Sabha) and State Legislative Assemblies (2015).

<sup>&</sup>lt;sup>100</sup> M. Deo, "One Nation One Election": A Comprehensive Analysis, 5 ShodhKosh: J. of Visual & Performing Arts 1079 (2024).

<sup>&</sup>lt;sup>101</sup> M. Pylee, *Indian Constitution* (S. Chandra & Co. Ltd. 2013).