

**KERALA STATE ELECTRICITY REGULATORY COMMISSION**  
**THIRUVANANTHAPURAM**

Present : Shri T K Jose, Chairman  
Adv. A.J Wilson, Member  
Shri B Pradeep, Member

Petition: OP No. 43/2023

In the matter of : Petition seeking exemption from the installation of Special Energy Meters and SCADA connectivity at injection and drawal point.

Petitioner : M/s Greenland Paper Mills Ltd

Petitioner represented by : Shri. Arun Varghese, project Manager

Respondents : Kerala State Electricity Board Ltd (KSEB Ltd)

KSEB Ltd represented by : Smt. Latha.S.V, AEE, TRAC

SLDC Represented by : Shri Rajesh K, EE

Date of hearing : 25.07.2023, 04:00 PM

Venue : Court Hall of the Commission

**Order dated 21.08.2023**

1. M/s Greenland Paper Mills Ltd filed a petition before the Commission on 10.05.2023 with the following prayers;
  - (1) “*Exempt us from the installation of Special Energy Meters and SCADA connectivity at **injection and drawal point**.*”
  - (2) *Directions may be given to KSEB Ltd not to insist on the installation of Special Energy Meters and SCADA connectivity at injection and drawal point, while granting Intra State Open Access.”*
2. Summary of the petition filed by the Petitioner is given below,
  - (1) The Petitioner is a HT Industrial Consumer at Kummalloor, Adichanalloor, Kollam, with a contract demand of 850 kVA.
  - (2) The petitioner established a 250kW wind project at Ramakkalmedu at Idukki district for the captive use at their industry, Kollam. The petitioner submitted the connectivity application with the Chief Engineer, Distribution Central, KSEBL. The petitioner also submitted the

application for open access. KSEB Ltd provided a dedicated feeder and connectivity work is in progress.

- (3) As per the Open Access Regulations, 2013, ABT meter and SCADA visibility both at 'injection and drawal points' are mandatory. The petitioner is having only a single injection of 250kW at 33kV Nedumkandam s/s at Ramakkalmedu.
  - (4) The petitioner has installed Special Energy Meters (SEM) as specified in the Central Electricity Authority (Installation and Operation of Meters) Regulations, 2006 at the injection point.
  - (5) The Regulation 11(4) of the KSERC (Connectivity and Intrastate Open Access) Regulations, 2013, stipulates that before granting open access, the nodal agency shall ensure that special energy meters are installed and maintained in accordance with the provisions of The Central Electricity Authority (Installation and Operation of Meters) Regulations, 2006 as amended from time to time and remote terminal units (RTU) are installed and maintained, as stipulated in the detailed procedure, to facilitate real time monitoring by SLDC.
  - (6) However, the Regulation 36(2) of KSERC (Connectivity and Intra State Open Access) Regulations, 2013 stipulates that the Commission, in consultation with the STU or the distribution licensees, may exempt small generators of capacity less than or equal to 1 MW and consumers with contract demand less than or equal to 1 MVA from the installation of Special Energy meters and SCADA connectivity.
  - (7) Hence the petitioner has requested the commission's intervention and exemption for the installation of SEM and SCADA connectivity at the injection and drawal point by permitting the existing HT ToD meter installed by the KSEBL, since they are unable to afford the expenses associated with installing SCADA and its yearly recurring costs.
3. The hearing on the petition was held on 25.07.2023 at the Court Hall of the Commission. Shri. Arun Varghese appeared on behalf of the Petitioner. Smt Latha, AEE, TRAC and Sri Rajesh K, EE, SLDC, presented the comments on behalf of the Respondents. The deliberations during the hearing are summarized below.
- (1) The issues raised in the petition was heard along with the petitions OP No:37/2023, 38,2023, 39/2023 on 25.07.2023 at the Court Hall of the Commission. The petitioner during the hearing submitted that they are also one of the investor company establishing 1x250KW, WEGs at Ramakkalmedu along with the petitioners in OP No. 37/2023, 38/2023 and 39/2023.

- (2) The petitioner further submitted that, the Commission vide the Order dated 18.01.2023 in petitions OP No:65/2022, 66,2022, 67/2022 had exempted the petitioners in OP No:37/2023, 38/2023, 39/2023 on 25.07.2023 namely, M/s KK Plastics, M/s Malayakam Aggregates & Sands Pvt. Ltd and M/s KIK Plastics Private Limited from the installation of the SEM meters at the drawal point.
- (3) The petitioner in the instant petition requested to grant exemption to them also from the installation of SEM at drawal point. The petitioner further requested to grant exemption from the installation of RTU and SCADA visibility at the injection point. The petitioner also submitted that the decision of the Commission regarding the installation of RTU and SCADA visibility at injection point in petitions OP No.37/2023, 38/2023, 39/2023 may be extended to them also. The petitioner also impleaded as a party in the petitions OP No.37/2023, 38/2023, 39/2023.

### **Analysis and Decision**

4. The Commission having examined in detail the petition filed by M/s Greenland Paper Mills Ltd, as per the provisions of the Electricity Act, 2003, KSERC (Connectivity and Open Access) Regulations, 2013, and other Rules and Regulations in force, decided as follows;
5. The following are the prayers of the petitioner in the instant petition, which is extracted below;
  - (i) Grant them exemption from installation of SEM and SCADA connectivity at drawal point.
  - (ii) Grant them exemption from installation of SEM and SCADA connectivity at injection point.
6. The Commission examined the prayer of the petitioner to exempt them from installation of Special Energy Meters (SEM) and SCADA connectivity at drawal points as per the prevailing Regulations notified by the Commission. The provisions in the relevant Regulations are extracted below.

#### **(1) Provisions in the KSERC (Renewable Energy and Net metering) Regulations, 2020**

The Regulation 24 of the KSERC (Renewable Energy and Net Metering) Regulations,2020 (herein after referred as RE Regulations, 2020) deals with the metering system of the Renewable Energy Generator/ Captive Generating Plants, which is extracted below.

*"24. Metering system.-*

- (1) The Renewable Energy Generator/ Captive Generating plant, the captive consumer and the open access customer as the case may be, shall install Special Energy Meters (SEM) as specified in the Central Electricity Authority*

*(Installation and Operation of Meters) Regulations, 2006 as amended from time to time, for accounting the quantum of energy generated, the quantum of energy injected into the transmission and/or distribution system and the quantum of energy consumed.*

*Provided that, if the RE generator/ consumer, elects to purchase his own special energy meter, he shall purchase the same from the firms empaneled by the STU/ distribution licensee, as specified in the Central Electricity Authority (Installation and Operation of Meters) Regulations, 2006 as amended from time to time:*

- (2) Special Energy Meters installed shall be capable of measuring the 15 minutes time-block-wise 'active energy and reactive energy', in accordance with the Central Electricity Authority (Installation and Operation of Meters) Regulations, 2006 as amended from time to time and the provisions of State Grid Code. The metering system shall have remote terminal unit (RTU) to facilitate real time monitoring by the SLDC as and when specified by the Commission.*
- (3) Special Energy Meters shall be open for inspection by any person authorized by the STU or the State Load Despatch Centre or the distribution licensee, as the case may be."*

**(2) Provisions in the KSERC (Connectivity and Open Access) Regulations, 2013**

- (i) The facilities of Open Access in the State are governed by the provisions of KSERC (Connectivity and Open Access) Regulations, 2013 (herein after referred to as Open Access Regulations, 2013). The Regulation, 11(4) of the Open Access Regulations, 2013 provides as follows.

*"(4) Before granting open access, the nodal agency shall ensure that special energy meters are installed and maintained in accordance with the provisions of The Central Electricity Authority (Installation and Operation of Meters) Regulations, 2006 as amended from time to time and remote terminal units (RTU) are installed and maintained, as stipulated in the detailed procedure, to facilitate real time monitoring by SLDC...."*

- (ii) Further, the Regulation 36 of the Open Access Regulations, 2013 provide as follows.

*"36. Metering. –*

- (1) All generating stations irrespective of capacity and all open access customers including embedded consumers shall be provided with special energy meters (SEM) by the State Transmission Utility or the distribution licensee, as the case may be:*

*Provided that, in case an open access customer or embedded consumer elects to purchase his own special energy meter, he shall purchase the same from the firms empanelled by the STU as specified in The Central Electricity*

Authority (Installation and Operation of Meters) Regulations, 2006 as amended from time to time:

**Provided further that the Commission, in consultation with the STU or the distribution licensees, may exempt small generators of capacity less than or equal to 1 MW and consumers with contract demand less than or equal to 1 MVA from this condition as and when found necessary.**

(2) Special Energy Meters installed shall be capable of time-differentiated measurements for time-block-wise active energy and voltage differentiated measurement of reactive energy in accordance with The Central Electricity Authority (Installation and Operation of Meters) Regulations, 2006 as amended from time to time and the provisions of State Grid Code and shall have remote terminal unit (RTU) to facilitate real time monitoring by the SLDC as and when specified by the Commission.

(3) Special Energy Meters shall be open for inspection by any person authorized by the STU or the State Load Despatch Centre or the distribution licensee as the case may be.

(4) All open access customers, STU, transmission licensee other than STU, distribution licensee and generating company shall abide by The Central Electricity Authority (Installation and Operation of Meters) Regulations 2006 as amended from time to time.”

As extracted above, the 2<sup>nd</sup> proviso to Regulation 36 of the Open Access Regulations, 2013 provides that, the Commission is permitted to exempt small generators having capacity less than or equal to 1 MW and consumers with contract demand less than or equal to 1MVA from installation of SEMs in consultation with STU.

7. As extracted above, as per the RE Regulations, 2020 and Open Access Regulations, 2013, the petitioner have to install SEM at the injection point as well as at drawal points for measuring the time block wise ‘active and reactive energy’ and also have the remote terminal units (RTU) to facilitate the real time monitoring by SLDC.

However, the Commission, as per the second proviso to Regulation 36(1) of the Open Access Regulations, 2013, can exempt the consumers with contract demand less than 1 MVA, who intend to avail open access within the State, from installing Special Energy Meters, in consultation with the STU or the Distribution licensee.

As per the above provisions, the petitioner requested before the Commission to grant exemption from installation of SEM at the drawal point at the petitioners industrial unit.

8. The Commission vide the Common Order dated 18.01.2023 in petitions OP No:65/2022, 66/2022, 67/2022 has exempted M/s KK Plastics, M/s Malayakam Aggregates & Sands Pvt. Ltd and M/s KIK Plastics Private Limited from the installation of SEM meters at drawal point. The petitioner in the instant petition, M/s Greenland Paper Mills Limited is one of the 8 investors installing 8x250KW WEGs at Ramakkalmedu along with the M/s Malayakam Aggregates & Sands Pvt. Ltd, M/s KIK Plastics Private Limited and M/s KK Plastics.

Since, the Commission already granted the exemption for the other investors in petitions OP No:65/2022, 66/2022, 67/2022 at Ramakkalmedu from the installation of SEM at drawal point, till the Commission notify the Regulations on Intra State Deviation Settlement and related matters and/or the Commission notify the Regulations on 'Forecasting, Scheduling and Deviation Settlement of Wind and Solar Generating Stations', whichever is earlier, the same exemption can be granted to the petitioner M/s Greenland Paper Mills Limited also.

9. The Commission, after examining the entire aspects in detail, by invoking the powers conferred on it under second proviso to Regulation 36(1) of the Open Access Regulations, 2013, has decided to exempt the drawal point of the petitioner from installing Special Energy Meters, till the Commission notify the Regulations on Deviation Settlement and related matters and/or the Commission notify the Regulations on "*Forecasting, Scheduling and Deviation Settlement of Wind & Solar generating stations in the State of Kerala*".
10. Regarding the other prayer of the petitioner to exempt them from the installation of RTU and SCADA visibility at injection point, the Commission vide the Common Order dated 04.08.2023 in petitions OP No:37/2023, 38/2023, 39/2023 has ordered the following;

#### **Orders of the Commission**

33. *The Commission, after examining the petitions filed by M/s Malayakam Aggregates & Sand Pvt Ltd, M/s KIK Plastics Pvt Ltd and M/s KK Plastics, as per the provisions of the Electricity Act, 2003, KSERC (Connectivity and Open Access) Regulations, 2013, and other Rules and Regulations in force, and the circumstances discussed in the preceding paragraph hereby orders that;*

- (1) *The prayers of the petitioners to exempt them from the installation of the RTU and SCADA visibility at injection point is hereby rejected.*
- (2) *The developer company M/s Ramakkalmedu Power Pvt Ltd is permitted to install the RTU and SCADA visibility at their pooling station at Ramakkalmedu on behalf of all the WEGs connected at the pooling station, as discussed under paragraph 25 of this Order.*

*Accordingly, the individual WEGs including the petitioners are exempted from installation of the RTU and SCADA visibility individually.*

- (3) The developer company M/s Ramakkalmedu Power Pvt Ltd is permitted to install power quality meter as specified in the CEA (Technical Standards for Connectivity of the Distributed Generation Resources) Amendment Regulations, 2019, on behalf of all the WEGs connected at the pooling station, as discussed under paragraph 32 of this Order.*
  - (4) KSEB Ltd shall put in place an inhouse mechanism under its Chief Engineer (REES) within two months from the date of this Order for facilitating investment in RE sector as discussed in paragraphs 28, 29, 30 and 31 of this Order. The status of compliance shall be submitted to the Commission latest by 09.10.2023. Non-compliance of the direction shall invite punishment under Section 142 of the EA-2003 to the concerned officials of KSEB Ltd at various levels.*
11. As extracted above, the Commission vide the Common Order dated 04.08.2023 in petitions OP No.37/2023, 38/2023, 39/2023, has ordered that, instead of providing RTU and SCADA visibility by individual WEGs at Ramakkalmedu, the RTU and SCADA visibility may be provided at pooling station at Pushpakandam at Ramakkalmedu by the developer M/s Ramakkalmedu Power Private Ltd. Since, the petitioner M/s Greenland Paper Mills Limited is one of the investors of the 8x250KW, WEGs developed at Ramakkalmedu, the RTU and SCADA visibility to be provided by the developer M/s Ramakkalmedu Power Private Ltd can facilitate the RTU and SCADA visibility of the petitioner M/s Greenland Paper Mills Limited also. Hence the petitioner is not required to install separate RTU and SCADA visibility at the injection point. The matter is decided accordingly.

### **Orders of the Commission**

12. The Commission, after examining the petition filed by the petitioner M/s Greenland Paper Mills Ltd as per the provisions of the Electricity Act, 2003, provisions in the KSERC (Connectivity and Open Access) Regulations, 2013, and other facts and circumstances discussed in the preceding paragraph hereby orders that;
- (1) In exercise of powers conferred on the Commission under second proviso to Regulation 36(1) of the KSERC (Connectivity and Intra State Open Access) Regulations 2013, and also based on the recommendations of the KSEB Ltd as the STU and distribution licensee of the State, the Commission hereby exempt the drawal point of the petitioner from the installation of Special Energy Meters, subject to the conditions that, "once the Commission notify the Regulations on Intra

State Deviation Settlement and related matters and/or the Commission notify the Regulations on 'Forecasting, Scheduling and Deviation Settlement of Wind and Solar Generating Stations', the petitioner shall install the Special Energy Meters as per the provisions of the said Regulations".

- (2) The Common Order of the Commission vide dated 04.08.2023 in petitions OP No:37/2023, 38/2023, 39/2023 regarding the exemption of RTU and SCADA visibility at injection point of the WEGs developed at Ramakkalmedu by the developer M/s Ramakkalmedu Power Private Ltd is applicable to the petitioner also.

The petition disposed off. Ordered accordingly.

**Sd/-  
T K Jose  
Chairman**

**Sd/-  
Adv. A J Wilson  
Member**

**Sd/-  
B Pradeep  
Member**

Approved for issue

**Sd/-  
C R Satheesh Chandran  
Secretary**