

# KERALA STATE ELECTRICITY REGULATORY COMMISSION

## THIRUVANANTHAPURAM

**Present** : **Shri. Preman Dinaraj, Chairman;**  
**Adv. A.J Wilson, Member (Law).**

### OP No.20/2021

**In the matter of** : **Petition filed M/s Pyarelal Foams (P) Ltd. for continuing with the existing HT TOD Meter at drawl points, along with exemption of installation of RTU and Communication facility at the drawl points.**

**Petitioner** : M/s Pyarelal Foams (P) Ltd  
NIDA, Koyyamarakkadu, Kanjikode P.O,  
Palakkad - 678621

**Petitioner represented by** : Smt. Neenu Skaria, Engineer.

**Respondent** : Kerala State Electricity Board Limited

**KSEB Ltd represented by** : Shri. K.G.P. Nampoothiri, EE, TRAC.

**Date of E-Hearing** : 29.04.2021, 3.00 PM

### Order dated 03.05.2021 in OP No. 20/ 2021

1. M/s Pyarelal Foams Private Limited, Palakkad (hereinafter referred to as the petitioner), have three HT (11KV) Industrial connections, under Palakkad Electrical Circle of the Distribution Licensee, Kerala State Electricity Board Ltd. (KSEB Ltd), namely:
  - (i) Pyarelal Foams (P) Ltd., Consumer Code: 1365280003265, Contract Demand - 400 kVA, Electrical Section - Kanjikode;
  - (ii) Pyarelal Foams (P) Ltd., Consumer Code: 1365020045181, Contract Demand - 400 kVA, Electrical Section – Kozhinjampara; and
  - (iii) Pyarelal Foams (P) Ltd., Consumer Code: 1368190061225, Contract Demand - 400 kVA, Electrical Section – Walayar.

2. M/s Pyarelal Foams (P) Ltd. has filed this petition dated 18.02.2021, seeking:

(i) Exemption from installing the Special Energy Meters and SCADA facility at the drawl points with contract demand less than 1 MW;

(ii) Directions to KSEB Ltd, not to insist on the installation of Special Energy Meters at drawal point, while granting Intra State Open Access.

3. The details provided in the petition are as follows:-

(i) They have three HT industrial connections in the name of Pyarelal Foams;

(ii) They are installing a 1 MW capacity Solar Plant with connectivity to Kanjikode substation through a 22 kV dedicated feeder;

(iii)The petitioner had submitted an application for Open Access with the Chief Engineer (Transmission), KSEB Ltd, Kozhikode for wheeling the power generated from the above solar plant to the three HT Industrial consumers owned by them;

(iv) In response to the application, the Chief Engineer (Transmission), KSEB Ltd, directed the applicant to make necessary arrangements to avail individual connectivity for the three drawal points, and also provide ABT meter and SCADA visibility both at the Injection and drawal points;

(v) They have installed Special Energy Meters, as specified in the CEA (Installation and Operation of Meters) Regulations, 2006 at the Injection point, in compliance of the provisions in Chapter IV, Clause 24 of the Kerala State Electricity Regulatory Commission (Renewable Energy and Net Metering) Regulations, 2020;

(vi) At the drawal points standard ToD meters are existing and their contract demand at each location is 400 kVA maximum;

(vii) Regulation 36 (Metering) of the Open Access Regulation 2013, have provided as follows:

***“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”.***

Hence, they request Hon. Commission to intervene in the matter and exempt the installation of SEM and SCADA connectivity at the drawal points, permitting to continue with the present ToD Meter installed by KSEB Ltd.

4. The Commission admitted the petition on 23.03.2021 as OP No. 20/ 2021 and Form 3 (A) notice was issued to the respondent KSEB Ltd. The hearing was conducted on 29.04.2021 through video conferencing. The representatives of the applicant and respondent attended the hearing and answered the queries raised during the hearing.

### **Analysis and decision**

5. The Commission has examined the petition filed by M/s Pyarelal Foams Private Limited as per the provisions of the Electricity Act, 2003, KSERC (Connectivity and Intra State Open Access) Regulations, 2013, and observed as follows:-
6. The petitioner is having three HT (11KV) Industrial connections each with 400 kVA Contract Demand (maximum). They have a single point injection from a 1 MW capacity solar plant, through a dedicated 22 kV feeder to Kanjikode Substation. The petitioner installed SEM along with the SCADA communication facility at the Injection Point from the plant. In order to facilitate transmission and wheeling of electricity from the solar power plant to the consumer premises on long term basis, the petitioner has to avail Long Term Open Access (LTA), as per the provisions of the KSERC (Connectivity and Intra-state Open Access) Regulations, 2013 (herein after referred as Open Access Regulations, 2013). As per Regulation 11 (4) of the Open Access Regulations, 2013, before granting open access, the nodal agency has to ensure the installation of the Special Energy Meters by the open access customer. The relevant Regulation is extracted below:

*“(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.*

*Provided that, the distribution licensee shall install special energy meters and remote terminal units in the premises of the applicants for open access within the time frame as stipulated in the detailed procedure.”*

7. The nodal agency for granting Long Term Open Access is the State Transmission Utility, which is Strategic Business Unit - Transmission of KSEB Ltd.

8. Further, Regulation 36 of the Open Access Regulations, 2013 deals with metering and related issues, which is extracted below:

*“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.”*

9. As extracted above, as per Regulation 36(2) of the Open Access Regulations, 2013, the Special Energy Meters installed by the Open Access Customers is essential for measuring the time block wise ‘active and reactive energy’, and also the remote terminal unit (RTU) is required to facilitate real time monitoring by SLDC.

10. In the State of Kerala, KSEB Ltd, the State Government owned incumbent distribution licensee has been generating and purchasing electricity for

meeting the electricity demand of the entire State. Accordingly, any deviation from the schedule within the State is being addressed by KSEB Ltd. itself by re-scheduling its own hydro generation or by restricting the consumption within the State. So far, only the embedded consumers of KSEB Ltd. are availing open access from the day ahead markets and any deviation in schedule by such consumers is borne by KSEB Ltd. by allowing them to draw power from the grid to compensate the deviations.

11. Considering the limited potential of renewable energy resources within the State and in order to encourage, the Renewable Energy plants including wind and solar generators, such installations are treated as 'must run units'. As on date, there is no mandatory provision for 'forecasting and scheduling of electricity' from such renewable sources in the State. Hence, the Commission has not notified the 'Regulations on Deviation Settlement and related matters' in the State of Kerala.
12. However, due to the large-scale integration of Renewables in the Country and the Central Government having fixed an ambitious target of generating 175 GW of power from Renewable sources by the year 2022, a different scenario is emerging; wherein renewable power will play a significant role in power availability with attendant grid issues. In order to address these issues and especially those related to forecasting and scheduling of power from Renewables, the Forum of Regulators (FOR), a body constituted under Section 166 (2) of the Electricity Act, 2003, had notified the model Regulations on 'Forecasting, Scheduling and Deviation Settlement of Wind and Solar Generating Stations at the State level' in the year 2015. Further, in order to address the scheduling ensuring grid frequency and its stability and such other similar issues resulting from large scale penetration of Renewables, the FOR has commissioned Technical experts to study the option to reduce the time block for deviation settlement mechanism from '15 minutes' time block to '5 minute' time block.
13. In Kerala also, many entrepreneurs are establishing Renewable Energy Power Plants for their captive use as well as for third party sale. In this developing scenario in order to address the issues resulting from large scale integration of the Renewables in the State grid, this Commission is also in the process of notifying the Regulations of 'Forecasting, Scheduling and Deviation Settlement of Wind and Solar Generating Stations in the State of Kerala'. The Commission desires to emphasize that once this Regulations is notified, all the Renewable Energy Generators, as well as the customers drawing power

from RE sources shall be required to install Special Energy Meters as mandated in Regulation 11(2) of the Open Access Regulations, 2013, so as to measure the time block wise drawals in 15 minutes time block or 5 minute time block, as the case may be.

14. However, presently 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 (SEM), in consultation with the STU or the Distribution licensee. KSEB Ltd, who is the STU and the distribution licensee, submitted during the hearing that, they had no objection to the Commission granting exemption from the installation of the SEM at the drawal point as per the second proviso to Regulation 36(1) of the Open Access Regulations, 2013, till the Commission notify the Regulations on Intra State Deviation Settlement Mechanism.
15. The Commission also took note of the fact that, vide Orders dated 09.08.2019 in Petition OP 48/2019, and 07.12.2020 in Petition OP 32/2020 , it had exempted M/s Malayala Manorama Co Ltd and M/s Bharath Charitable Hospital Society respectively from the installation of SEM at the drawal points with contract demand less than or equal to 1 MVA, 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 and Solar Generating Stations' in the State of Kerala.
16. The Commission can, by exercising the power conferred on the Commission as per the second proviso to Regulation 36(1) of the Open Access Regulations, 2013, and also in consultation with KSEB Ltd as the STU and distribution licensee, exempt the applicant from the installation of SEM, RTU and SCADA visibility at the three drawal points of the petitioner. In similar cases, the Commission had granted exemption to the petitioners; vide the orders dated, 9.08.2019 in OP No. 48/ 2019 and 07.12.2020 in OP No. 32/ 2020. But these orders were issued clarifying that, the exemption is temporary and shall be valid only 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 and Solar Generating Stations in the State of Kerala'.

## **Order of the Commission**

17. The Commission after due scrutiny of; the Petition filed by M/s Pyarelal Foams (P) Ltd., clarifications provided during the hearing, submissions by KSEB Ltd and the petitioner, the provisions of the Electricity Act, 2003, KSERC (Connectivity and Open Access) Regulations, 2013, *KSERC (Renewable Energy and Net Metering) Regulations, 2020*, earlier orders of the Commission in related matters and the facts and circumstances discussed in the preceding paragraphs, hereby orders that;

- (1) In exercise of the 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 in consultation with KSEB Ltd. the STU and Distribution licensee of the State, the Commission hereby exempt the Petitioner, i.e., M/s Pyarelal Foams Private Limited, Palakkad from the installation of Special Energy Meters, RTU and SCADA system, at the three consumer end drawal points as requested by the petitioner in the petition, subject to the condition specified below.
- (2) Once the Commission notifies the Regulations on 'Intra State Deviation Settlement and related matters' and/ or the Regulations on 'Forecasting, Scheduling and Deviation Settlement of Wind and Solar Generating Stations' in the State of Kerala, the petitioner shall install the Special Energy Meters and associated facilities as per the provisions of the said Regulations.

The Petition is disposed off as ordered above.

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

**Sd/-**  
**Preman Dinaraj**  
**Chairman**

Approved for issue

**Sd/-**  
**Secretary**