

FORM 1

(General Heading for Petition)

BEFORE THE KERALA STATE ELECTRICITY REGULATORY COMMISSION

Petition No:

In the matter of: Clarification on provisions laid down under Chapter III clause 13 (General Conditions) of KSERC-Notification No. 1204/D(T)/2019/KSERC dated, 7th February 2020

Name and full address of Petitioner/Applicant: Indian Oil Officers Cooperative Housing Society Limited situated at 44/3396A, Behind JN Stadium, Stadium Link Road, Opposite IMA, Kaloor, Kochi 682025.

Name and full address of respondent(s): The Chairman and Managing Director, Kerala State Electricity Board Limited, Vaidyuthi Bhavanam, Trivandrum.

FORM 2

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REGULATORY COMMISSION

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I, T Ramachandran, residing at House Number 60/276 Poornasree, Luiz Lane, Kadavanthra, Cochin – 682020, do solemnly affirm and state as follows:

1. I am Secretary of Indian Oil Officers Co-operative Housing Society Ltd (IOCHS) situated at 44/3396A, Behind JN Stadium, Stadium Link Road, Opp. IMA, Kaloor, Kochi 682 025, Ernakulam District, Kerala State and the petitioner in the above matter and I am duly authorised by the society to make this affidavit on its behalf. I solemnly affirm at Kaloor on this 10th day of December 2020 that
 - (i) The contents of the above petition are true to my information, knowledge and belief. I believe that no part of it is false and no material has been concealed there from.
 - (ii) The statements made in the paragraphs of the accompanying application herein now shown to me are true to my knowledge and are derived from the official records made available to me and are based on information and advice received which I believe to be true and correct.

Ernakulam
Dated this 10th day of
Dec. 2020.



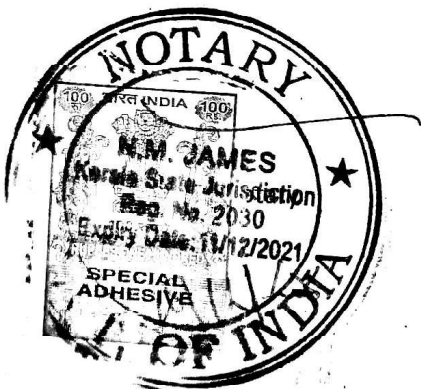
Deponent

Secretary

Indian Oil Officers Co-operative Housing Society Ltd
Ernakulam – 682025

Solemnly affirmed and signed before me: on

10th December 2020 per
my office



N. M. JAMES
Advocate & Notary
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Petitioner: Indian Oil Officers Cooperative Housing Society Limited (IOCHS) situated at 44/3396A, Behind JN Stadium, Stadium Link Road, Opposite IMA, Kaloor, Kochi 682025.

Respondent: The Chairman and Managing Director, Kerala State Electricity Board Limited, Vaidyuthi Bhavanam, Trivandrum.

Indian Oil Officers Cooperative Housing Society Limited(IOCHS) HUMBLY STATES THAT:

1. We want to install 100KWp Grid Interactive Solar Power Plant connected to the common facility (elevator, common lighting, water-pump, CCTV etc) of our said G+20 residential apartment located in Kaloor, Ernakulam.
2. The connected load to the common facility meter is 55.4kW at the moment. This will be increased by another 17kW after completion of construction of 2nd tower expected in Mar '21.
3. As per provisions laid out in Chapter III (General Conditions) of KSERC regulation No.1204/D(T)/2019/KSERC dated, 7th February 2020,

“Provided that the domestic consumers with connected load up to 20KW is permitted to install ‘Renewable Energy System’ of capacity up to 20KW, irrespective of their connected load.

Provided further that the above limit of 20KW connected load shall not apply in the case of Group Housing societies and residential flats, for common services such as lift, common lighting, club house, car parking, common areas etc.

Provide also that, prosumers including those prosumers mentioned above are also permitted to install Renewable Energy System in excess of their connected load or contract demand as applicable. However the benefit of Net Metering shall not be allowed to such presumers and such presumers shall be treated at par with the prosumers having RE capacity more than 1MW as detailed in chapter IV of these Regulations.”

4. As per provision mentioned in Point 3 above, we understand that for “Group Housing societies and residential flats” are exempt from the 20kW limit and such prosumers are eligible to connect solar plants of capacity above the limit of connected load.
5. However when we approached KSEBL for issuing feasibility report for 100kW, we were refused by letter from the AXE, Palarivattom division vide letter no DB 15/ESD-TVYM/Solar/Con No 13829/Kaloor/2020-21/175 dated 15-10-2020 The stated reason of refusal was the above referred KSERC notification. Copy of the refusal letter attached as annexure.
6. We understand that the regulation has been wrongly interpreted by KSEBL in the above case.

7. As the over 100 families who are going to stay in the residential flats will not be able to benefit from solar power harvesting due to lack of sufficient roof space, we believe KSERC's intent is to allow solar plants of capacity above connected load for common facility connections.
8. As the load on the distribution transformer catering to the housing complex and hence over 100 families, will be sufficient to allow 100kWp solar power feeding, we understand that there is no technical reason for KSEBL refusal as in Point 5 and that KSERC's intent is to allow maximum solar capacity installation for common facility connection.
9. As the Central and State Governments are encouraging citizens to use solar power, we understand that KSERC's intent is to exempt "Group Housing societies and residential flats" from the limit of connected load.
10. We, as responsible citizens occupying the flats in the said residential complex, want to participate and contribute to the National interest of reducing carbon footprint and adopt renewable source of power and we understand that KSERC's intent is to exempt "Group Housing societies and residential flats" from the limit of connected load to address this purpose.

PRAYER: In light of the above submission, the petitioner prays to the Hon'ble Commission to issue a clarification note against their notification no. 1204/D(T)/2019/KSERC dated, 7th February 2020 to clarify that connected load is not a limitation for connecting solar plants for "Group Housing societies and residential flats" prosumers and hence enable us to connect 100 kWp solar power plant at our residential apartment as explained in the submission above.





DB 15/ ESD-PVTM / Solar /con.no. 13829 / Kaloor /2020-21/ 175 dtd 15-10-2020

The Secretary
Indian Oil Officers Co operative Housing Society
44/3396A, Behind JN Stadium,
Stadium Link Road, Opp IMA
Kaloor, Kochi 682 025.

Sir,

Sub : Issue of feasibility Report for 100kWp Solar Plant - Reg:
Ref: 1. Your request letter dated 14-10-2020
2. KSERC (Renewable Energy & Net Metering) Regulation, 2020.

In Regulation 13 (2) (a), it is mentioned that the "above limit of 20Kw connected load shall not apply in the case of group having societies and residential flats for common services such as lift, common lights, club house, car parking, common areas etc."

Next para of the same Regulation says that " prosumers mentioned above are also permitted to install Renewable Energy system in excess of their connected load or contract demand as applicable. However, the benefit of net metering shall not be allowed to such prosumers and such prosumers shall be treated at par with the prosumers having RE capacity more than 1Mw, as detailed in Chapter IV of these Regulations."

Hence it is hereby informed that feasibility, for 100 kWp, as requested by you, cannot be granted under Chapter III of the said Regulation. If you are willing to comply with provisions of Chapter IV, please confirm by return mail.

Regards

Assistant Executive Engineer
Electrical Subdivision
Palarivattom.



Copy to : The Assistant Engineer, Electrical Section, Kaloor.