



KERALA STATE ELECTRICITY BOARD LIMITED

(Incorporated under the Indian Companies Act, 1956)

Tariff & Regulatory Affairs Cell

Vydyuthi Bhavanam Pattom Thiruvananthapuram 695 004 India

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KSEB/TRAC/KSERC/PM KUSUM/ 2021-22/390

28-9-2021

To

**The Secretary,
Kerala State Electricity Regulatory Commission,
KPFC Bhavanam,
Vellayambalam.**

Sir,

Sub: Petition seeking approval of Average pooled Power Purchase of KSEBL for payment at the end of the settlement period - reg:

KSEBL humbly submit herewith a petition seeking approval of Average pooled Power Purchase of KSEBL for payment at the end of the settlement period for the excess energy banked by the prosumers and captive consumers as per Regulation 26(5), 27(7) and 29(4) of the KSERC (Renewable Energy and Net Metering Regulations),2020 for kind consideration.

Yours faithfully,

Chief Engineer (Commercial & Tariff)




Acc: Original petition + 5 copies
Cheque no. 148420

AFFIDAVIT VERIFYING THE PETITION

I, Sri. Sunny John, son of Sri. E.A.John, aged 55 years residing at Kuricheth Eramalladil, Near SCS Junction, Thiruvalla-1 do solemnly affirm and say as follows:

I am the Chief Engineer(Commercial & Tariff) of the Kerala State Electricity Board Ltd., Vydyuthi Bhavanam, Pattom, Thiruvananthapuram, and the Petitioner in the above matter and I am duly authorized by the Board to make this affidavit on its behalf. I solemnly affirm at Thiruvananthapuram on this the 28th day of September 2021 that the contents of the above submission 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.


Deponent


Chief Engineer(Commercial & Tariff)
Kerala State Electricity Board Limited
Vydyuthi Bhavanam, Pattom
Thiruvananthapuram – 695 004.

VERIFICATION

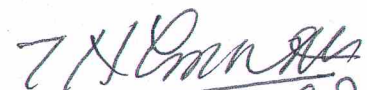
I, the above named deponent, solemnly affirm at Thiruvananthapuram on this, the 28th day of September 2021 that the contents of the affidavit are true to my information, knowledge and belief, that no part of it is false and that no material has been concealed there from.

Deponent


Chief Engineer(Commercial & Tariff)
Kerala State Electricity Board Limited
Vydyuthi Bhavanam, Pattom
Thiruvananthapuram – 695 004.

Solemnly affirmed and signed before me.




28/9/2021
Advocate and Notary

T. N. OMANA
Advocate & Notary
Thiruvananthapuram Revenue District
Kerala State South India

**BEFORE THE HONOURABLE KERALA STATE ELECTRICITY
REGULATORY COMMISSION**

at its office at C.V. Raman Pillai Road, Vellayambalam. Thiruvananthapuram.

FILING NO

CASE No.

IN THE MATTER OF:

Petition seeking approval of Average pooled Power Purchase of KSEBL for payment at the end of the settlement period for the excess energy banked by the prosumers and captive consumers as per Regulation 26(5), 27(7) and 29(4) of the KSERC (Renewable Energy and Net Metering Regulations),2020.

Petitioner : Kerala State Electricity Board Ltd.,
Vydyuthi Bhavanam, Pattom,
Thiruvananthapuram-695 004.

**BEFORE THE HON'BLE KERALA STATE ELECTRICITY REGULATORY
COMMISSION**

In the Matter of : **Petition seeking approval of Average pooled Power Purchase of KSEBL for payment at the end of the settlement period for the excess energy banked by the prosumers and captive consumers as per Regulation 26(5), 27(7) and 29(4) of the KSERC (Renewable Energy and Net Metering Regulations),2020**

Petitioner : **Kerala State Electricity Board Ltd,
Vydyuthi Bhavanam, Pattom,
Thiruvananthapuram**

THE PETITIONER HUMBLY SUBMITS THE FOLLOWING THAT:

1. The petitioner, Kerala State Electricity Board Limited (KSEBL), is an integrated State Public Sector power utility company constituted by the State Government. KSEBL is carrying out the Generation, Transmission and Distribution functions through three strategic business units.
2. Hon'ble Commission has notified KSERC (Renewable Energy and Net Metering) Regulations,2020 governing 'Net Metering', 'Banking' and 'Settlement' of excess energy injected and banked with the distribution licensee by prosumers/captive consumers in the State. The relevant provisions of the Regulations are extracted below.

Regulation 20 of KSERC (Renewable Energy and Net Metering) Regulations,2020

"20. Banking facility for prosumers.- (1) In case the energy injected by the prosumer from his renewable energy system exceeds the energy consumed by him from the distribution licensee during the billing period, such excess energy is allowed to be banked with the distribution licensee and to be carried forward to the subsequent billing periods of the settlement period."

3. As per KSERC (Renewable Energy and Net Metering Regulations),2020, the distribution licensee shall at the end of the settlement period pay for the excess energy banked by the prosumers and captive consumers at the Average Pooled Power purchase Cost (APPC) of the licensee as approved by Commission from time to time. The relevant provisions of the Regulations are extracted below.

"26(5) The licensee shall pay, within one month, for the net surplus energy available at the credit of the prosumer at the end of the settlement period as

per sub Regulation (4) above, at the Average Pooled Power Purchase Cost (APPC) of the licensee approved by the Commission, from time to time.

27 (7) The licensee shall pay, within one month, for the net surplus energy available at the credit of the prosumer at the end of the settlement period as per sub Regulation (4) above, at the Average Pooled Power Purchase Cost (APPC) of the licensee approved by the Commission, from time to time.

29(4) The licensee shall pay for the net electricity banked by the prosumer/ captive consumer at the end of the settlement period, at the Average Power Purchase Cost (APPC) approved by the Commission;”

4. As per the regulation, the “settlement period” means the period beginning from first day of October and ending with thirtieth day of September in the next Year for solar and for non-solar sources, the period from the first day of April in a year to the thirty first day of March in the next calendar year.

“2(1)(bk) ‘Settlement Period’ means, the periods for the purpose of accounting of electricity from the following categories of renewable sources,- (i) from solar sources, the period from the first day of October in a Gregorian calendar year to the thirtieth day of September in the next calendar year; and (ii) from non-solar sources, the period from the first day of April in a Gregorian calendar year to the thirty first day of March in the next calendar year;”

5. To compute the ‘Average Pooled Power Purchase Cost’ KSEBL has followed the methodology stipulated in the Regulations of Hon’ble Commission and the orders issued earlier. The methodology specified therein is in line with the Regulations of CERC. The Relevant Regulations and orders are extracted below.

- a. Extract from Kerala State Electricity Regulatory Commission (Connectivity and Intrastate Open Access) Regulations, 2013

“3(4) “average pooled power purchase cost” means the weighted average pooled price as approved by the Commission at which distribution licensee has purchased electricity including cost of self generation if any, in the previous year from all energy suppliers, long-term and short-term, but excluding those based on renewable energy sources, as the case may be;”

- b. Hon’ble Commission in Order dated 30-9-2014 in Original Petition No. 9/2014 has approved the ‘Average Pooled Power Purchase Cost’ of KSEBL for the year 2014-15. Also in the suo motu order dated 17-4-2017 (Orders in the Suo Motu Proceedings for determination of Tariff for Electricity for the Financial year 2017-18) has also arrived at the pooled cost for 2017-18.

- c. Hon’ble CERC vide the regulation 5 (1) (c) of the CERC (Terms and Conditions for Recognition and Issuance of Renewable Energy Certificate for Renewable Energy Generation) Regulation, 2010, has defined the Pooled Cost of Power Purchase as extracted below.

“for the purpose of these regulations ‘Pooled Cost of Purchase’ means the weighted average pooled price at which the distribution licensee has purchased the electricity including cost of self generation, if any, in the previous year from all the energy suppliers long-term and short term, but excluding those based on renewable energy sources, as the case may be.”

6. Accordingly, as per the above Regulations and orders, KSEBL has been computing the Average Pooled Power Purchase Cost (APPC) of KSEBL for the years from 2018-19 onwards with the approved power purchase cost and transfer cost of SBU-G as per MYT order dated 8-7-2019 since no APPC has been approved by KSERC for the years 2018-22 in its tariff order dated 8-7-2019.
7. For the year 2020-21, KSEBL has derived APPC based on the approved power purchase cost for the year 2019-20, the methodology fixed by CERC and adopted by KSERC and the APPC so derived and approved by Board was Rs.2.94/unit.
8. To enable the settlement of the energy banked by the grid connected solar generators in the state as on 30th September 2021, the APPC for the year 2021-22 as approved by Hon’ble Commission is required. For fixing the Average Pooled cost of power purchase for the year 2021-22, the details of price at which KSEBL has purchased the electricity including cost of self generation, if any, in the previous year i.e. during the year 2020-21 from all the energy suppliers long-term and short term etc are considered.
9. The source wise details of generation and power purchase for the year 2020-21 as approved by KSERC vide the MYT order dated 8-7-2019 and APPC for 2021-22 calculated as per the methodology specified above is given below.

	(MU)	Cost (Cr)
Own generation less RE	6229.25	533.61
CGS (KSEB Ltd.periphery)	11274.77	4196.25
Traders (Long Term & Medium Term)	8647.06	3518.11
short term		
RGCCPP		0
Less surplus sale	-1231.36	-615.68
Total	24919.72	7632.29
Pooled cost		3.06

10. Thus the Average Pooled Power Purchase Cost (APPC) of KSEBL for the year 2021-22 computed as per the methodology approved by Hon’ble Commission is Rs.3.06/unit, for payment to Renewable energy prosumers/Captive consumers at the end of settlement period.
11. It is humbly requested that approval may kindly be granted for adopting Rs.3.06/unit as the Average pooled Power Purchase of KSEBL for 2021-22 for

payment at the end of the settlement period for the excess energy banked by the prosumers and captive consumers as per Regulation 26(5), 27(7) and 29(4) of the KSERC (Renewable Energy and Net Metering Regulations),2020

Prayer

KSEBL humbly request that approval may kindly be granted for adopting Rs.3.06/unit as the Average pooled Power Purchase of KSEBL for 2021-22 for payment at the end of the settlement period for the excess energy banked by the prosumers and captive consumers as per Regulation 26(5), 27(7) and 29(4) of the KSERC (Renewable Energy and Net Metering Regulations),2020.


Chief Engineer(Commercial & Tariff)

28/9