

**FORM 1**  
**[See Regulation 24(3)]**  
**General Heading for petitions**

**BEFORE THE KERALA STATE ELECTRICITY  
REGULATORY COMMISSION**

**Petition No:**

*(To be filled by the Office, if number has not earlier been assigned)*

**IN THE MATTER OF:**

**Exemption of RTU and SCADA visibility at injection points .**

**Name (S) and full address (ES) of  
Petitioner(S)/ Applicant (S)**

Petition is filed by : **K.K.Ibrahim ( Managing Partner)**  
M/s K.K Plastics,  
Industrial Development Area (I.D.A),  
Erumathala, PO,  
Aluva-683112  
Ernakulam Dist.  
Mob: 9447740012  
E-mail: kkplastics11@gmail.com

**Name (S) and full address (ES) of respondent (S)**

:

1. Kerala State Electricity Board,  
Represented by the Secretary  
VydyuthiBhavanam, Pattom,  
Thiruvananthapuram.  
Pin No. 695004.
2. Chief Engineer, REES  
Kerala State Electricity Board,  
VydyuthiBhavanam, Pattom,  
Thiruvananthapuram.  
Pin No. 695004.

Aluva  
10.01.2023

**FORM 2**  
**[See Regulation 24(5)]**

**BEFORE THE KERALA STATE ELECTRICITYREGULATORY COMMISSION**

**Petition No:**

*(To be filled by the Office, if number has not earlier been assigned)*

**IN THE MATTER OF:**

**Exemption of RTU and SCADA visibility at injection points .**

**Name (S) and full address (ES) of  
Petitioner(S)/ Applicant (S)**

Petition is filed by : **K.K.Ibrahim ( Managing Partner)**  
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Mob: 9447740012  
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**Name (S) and full address (ES) of respondent (S)**

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VydyuthiBhavanam, Pattom,  
Thiruvananthapuram.  
Pin No. 695004.

### **AFFIDAVIT VERIFYING PETITION:**

I, K.K. IBRAHIM Son of KASSIM. aged 63 YEARS factory building at M/s K.K Plastics, Industrial Development Area (I.D.A), Erumathala, PO, Aluva-683112, do solemnly affirm and state as follows:

1. I am a petitioner/applicant/ respondent in the above matter
2. The statement made in the paragraphs A-I of the petition application replay herein now shown to me and marked with the letter "A" are true to my knowledge and the statement made in paragraphs "I" are based on information received and I believe them to be true.

Solemnly affirmed at Aluva on this day of 10<sup>th</sup> January 2023 that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there from.

Petitioner/Applicant/Respondent

**K.K.Ibrahim ( Managing Partner)**

M/s K.K Plastics,  
Industrial Development Area (I.D.A),  
Erumathala, PO,  
Aluva-683112  
Ernakulam Dist.  
Mob: 9447740012  
E-mail: kkplastics11@gmail.com

Identified before me Notary

## INTRODUCTION

- A. We have established 250kW Wind Project at Ramakkalmedu. We have executed connectivity agreement with Deputy ChiefEngineer,Electrical Circle,Thodupuzha.We have submitted the application as an Open Access Consumer. KSEBL have provided us with a dedicated feeder and connectivity work is in progress.
- B. We are having a HT Industrial connection in the name of M/s K K Plastics, at Aluva. We like to use the Generated power at our Aluva factory. We will submit open access petition with CE, Transmission South, Trivandrum.
- C. As per Open Access Regulation 2013, ABT meter and SCADA visibility both at Injection and drawal points are mandatory. We are having only single injection of 250kW at 33kV Nedumkandam Substation, Ramakkalmedu and we like to wheel the energy to our Industry at Aluva (160kVA Contract Demand, with HT Industrial connection).
- D. As per the metering arrangement in the injection point: -

The Kerala State Electricity Regulatory Commission (Renewable Energy and Net Metering) Regulations, 2020, In Chapter IV, Clause 24 says that

- a) 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.
  - b) 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.
- E. The Open Access Regulation 2013, Reg. 11, Sub Reg. (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.

We have already installed Special Energy Meters (SEM) as specified in the Central Electricity Authority (Installation and Operation of Meters) Regulations, 2006 in the injection point.

- F. We are having drawal point with 160kVA Contract demand and standard ToD meter is used in the factory./ We are having only single injection of 250kW at 33kV,66kV Nedumkandam Substation, Ramakkalmedu. In the Open Access Regulation 2013, Reg.36.Metering, Clause 3 ***“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 we request Hon. Commission to intervene in the matter and exempt the installation of RTU and SCADA Visibility in the **injection** point, permitting the present SEM Meter installed by us.

G. Our Factory details is as follows: -

1. K K Plastics

LCN : 29/3835, (CD - 160kVA)

Cons No.1355670001667

I.D.A, Erumathala

Ernakulam - 679 535

Electrical Sec. -Edathala.

- H. Fees Rs.10,000/- (Rupees Ten Thousand only) as per Annex II, Reg.18, schedule of fees see Regulation 64 (1) of Kerala State Electricity Regulatory Commission (Conduct of Business) Third Amendment Regulation 2014, is enclosed as **DD with no.523761 dtd10.01.2023** drawn in favour of the Secretary, KSERC, payable at Trivandrum from Federal bank Ltd , Perumbavoor.

I. **REFERENCE:**

- a. Electricity Act 2003
- b. CERC : Indian Electricity Grid Code 2010
- c. CEA : Installation and Operation of Meters Regulation 2006.
- d. KSERC : Detailed Procedure for Grant of Connectivity & Open Access in Intra-State Transmission System dated 21.04.2015
- e. Open Access Regulation 2013

f. Kerala State Electricity Regulatory Commission (Renewable Energy and Net Metering) Regulations, 2020

**RELIEF SOUGHT**

1. Exempt us from the installation of RTU and SCADA visibility at **injection** point .
2. Directions may be given to KSEB Ltd not to insist on the installation of RTU and SCADA Visibility at **injection** point, while granting Intra State Open Access.

**K.K.Ibrahim ( Managing Partner)**

M/s K.K Plastics,



## NOMINATION OF REPRESENTATIVE

I, K.K.Ibrahim, Managing Partner, M/s K K Plastics, Industrial Development (I.D.A), Erumathala, PO, Aluva-683112, Kerala hereby nominates Mr. Arun Varghese, Eeraly house Vappalassery. Po , Angamaly, Joespuram. Jnra 110, Pin 683582 as my representative in all proceedings of this petition and confirm that any statement, acceptance or rejection made by her shall be binding on me. She has signed below in my presence.

Signature of Representative

Signature of Petitioner

Arun Varghese

**K.K.Ibrahim ( Managing Partner)**  
M/s K.K Plastics,

Attested by Petitioner

**K.K.Ibrahim ( Managing Partner)**  
M/s K.K Plastics,