BEFORE THE HON'BLE KERALA STATE ELECTRICITY REGULATORY COMMISSION

In the Matter of : Petition under Regulation 66 of the KSERC(Renewable Energy and Net Metering) Regulations,2020 seeking modification 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), has filed this petition seeking **modification** of the KSERC (Renewable Energy and Net Metering Regulations),2020 **in line with the** "The Electricity (Rights of Consumers) Rules,2020 notified on 31-12-2020 and the Electricity(Rights of Consumers)Amendment Rules,2021 notified on 28-6-2021 and the present trend of solar penetration.

Background of the petition

2. Hon'ble Commission has on 7-2-2020 notified KSERC (Renewable Energy and Net Metering) Regulations,2020 applicable to all the existing and new, Grid Interactive Renewable Energy Systems, consumers, prosumers, captive consumers, captive generating plants, generating companies, distribution licensees and obligated entities, in the matter of Determination of Tariff of Renewable Energy, Renewable Purchase Obligation, Net Metering, Banking, Generation Based Incentives and related matters. The Regualtion came into effect from 5th of June 2020.

3. The Regulations provide 'Net Metering ' facility for grid interactive RE systems of not less than one kW and not exceeding 1000 kW capacity on AC side of the invertor. The relevant regulation is extracted below.
Quote:
"13(2) The Grid Interactive Renewable Energy Systems, installed by a prosumer at his premise under this chapter shall be: (a) of not less than one kW and not exceeding 1000 kW capacity on AC side of the invertor connected to the net meter

of the distribution system, limited to the sanctioned connected load or contract demand as applicable to the prosumer, with the distribution licensee.

Provided that the domestic consumers with connected load up to 20 kW is permitted to install 'Renewable Energy System' of capacity up to 20 kW, irrespective of their connected load. Provided further that the above limit of 20 kW 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.

Provided 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 prosumers and such prosumers shall be treated at par with the prosumers having RE capacity more than 1 MW, as detailed in Chapter IV of these Regulations.

Provided also that, the Renewable Energy Systems installed by the prosumers under net metering as on the date of notification of these Regulations shall be allowed to continue irrespective of their contract demand or connected load."

Unquote:

4. The Regulations allow banking facility for such renewables as submitted below.

Quote:

"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.

(2) The distribution licensee is permitted to account the energy generated from above such renewable energy system installed by the prosumer towards its RPO.

"

Unquote:

5. The energy accounting, banking and settlement of renewable energy systems under ;Net Metering' are as submitted below.

"21. Net metering, Energy Accounting, Banking and Settlement.-

(1) The distribution licensee shall take the meter reading of the 'renewable energy system' regularly for each 'billing period' and record the readings of both the renewable energy meter and the net meter.

(2) For each billing period, the distribution licensee shall make the following information available in its bill to the prosumer: (i) Time period wise (normal hours, peak hours and off-peak hours) Renewable energy generation recorded in the energy meter for the prosumer with connected load above 20 kW, and total generation from the RE system for the prosumers with connected load 'of

and below 20kW'. (ii) Time period wise electricity consumption of the prosumer with connected load above 20 kW, and total consumption in the case of the prosumer with connected less than 20 kW. (iii) Net billed electricity, if any, for which payment is to be made by the prosumer; (iv) Excess energy brought forward from the last billing period; (v) Excess energy carried forward to the next billing period.

(3) The energy accounting, banking and settlement of energy generated, drawn and injected by a prosumer with connected load of and below 20 kW shall be done as below; (i) The distribution licensee, during a billing period shall extend the facility to the prosumer having connected load of and below 20 kW under net metering arrangements, to draw back from the grid, the electricity injected during a time block at a different time period without any restriction. (ii) In case the electricity supplied by the distribution licensee during any billing period exceeds the electricity injected in to the grid by the prosumer from his renewable energy system, the distribution licensee shall raise a bill for the net electricity consumption at the prevailing tariff, after adjusting any excess electricity banked from the previous billing period; (iii) In case the electricity injected by the prosumer's renewable energy system exceeds the electricity consumed from the distribution licensee during the billing period, such excess energy shall be allowed to be banked and be carried forward to the next billing period as specified under Regulation 20(1) above.

(4) Accounting and settlement of energy generated, drawn and injected by the prosumer having connected load above 20 kW; (i) The electricity injected from the renewable energy system in a time period during a billing period shall be first set off against the electricity consumed during the same time period. (ii) Any excess generation over consumption in that time period during the billing period shall thereafter be set-off against other time period, subject to the following. (a) 80% of the net energy injected in time periods other than peak hours, be allowed to adjust against peak hour consumption. (b) The net energy injected during peak hours shall be allowed to be adjusted 100% during the peak hour and the balance shall be allowed to be adjusted 120% during other time blocks. (c) At all other time periods, except energy injection during peak hours, 100% of the net energy injected in any time periods will be allowed to adjust against the consumption, during the time period other than peak hours. (iii) Any excess generation during a billing period, after adjusting against the consumption during the same billing period as per clause (i)&(ii) above shall be banked and carried forward, to the next billing period as specified under Regulation-20(1) above. (iv) Such surplus energy carried forward to the next billing period after accounting for the banking charges specified therein shall be, accounted along with the renewable energy generation during the subsequent billing period, and the same shall be settled against the energy drawn in the subsequent billing period as per the procedures specified under clause (i) & (ii) above. (v) If the

electricity injected into the system by the prosumer as measured in the net meter, is less than the total electricity drawn from the licensee, during any billing period, the licensee shall recover from such prosumer, the electricity charges at the rates applicable as per the tariff order issued by the Commission, for the net quantum of electricity drawn by him from the distribution system, after taking into account any balance electricity banked in the previous billing period.

(5) The licensee shall pay to the prosumer for the net electricity balance in his account at the end of the settlement period, at the Average Power Purchase Cost (APPC) approved by the Commission; Provided that, in case of delay in payment of the net amount due to the prosumer beyond 30 days from the settlement date, the licensee shall pay interest to the prosumer at the FBIL rate +200 base points prevailing on 1st April of the settlement year.

(6) The prosumer is exempted from the payment of transmission charges, wheeling charges, cross subsidy surcharges for the electricity generated and consumed at the same premises from the renewable energy system under net metering facility.

(7) The quantum of electricity generated from the renewable energy system of the prosumer, shall qualify for accounting towards the Renewable Purchase Obligation (RPO) of the distribution licensee, as specified elsewhere in these Regulation."

Unquote:

6. Thus as per the above Regulations,
   (1) for prosumer having connected load of and below 20 kW under net metering arrangements, they are allowed to draw back from the grid, the electricity injected during a time block at a different time period without any restriction. Excess energy shall be allowed to be banked and be carried forward to the next billing period .
   (2) For prosumer having connected load above 20 kW; only 80% of the net energy injected in time periods other than peak hours, be allowed to adjust against peak hour consumption. The net energy injected during peak hours shall be allowed to be adjusted 100% during the peak hour and the balance shall be allowed to be adjusted 120% during other time blocks. Any excess generation during a billing period, after adjusting against the consumption during the same billing period as above shall be banked and carried forward, to the next billing period.

7. For prosumers and captive consumers above 1MW, the energy accounting and billing is as stipulated under Regulation 26 and 27 of the KSERC(Renewable Energy and Net Metering)Regulations,2020, the summary of the same is submitted below.

(1) 5% of the energy injected into the grid of the transmission and/or the distribution licensee shall be accounted towards 'grid support charges' and the balance 95% shall be treated as net energy.

(2) 80% of the net energy injected in time periods other than peak hours, be allowed to be adjusted against peak hour consumption. The net energy injected during peak hours shall be allowed to be adjusted 100% during the peak hour and the balance shall be allowed to be adjusted at 120% during other time blocks. At all other time periods, except energy injection during peak hours, 100% of the net energy injected in any time periods will be allowed to be adjusted against the consumption, during the time period other than peak hours.

(3) The excess energy, if any, available at the end of the billing period is allowed to be banked and carried forward to the subsequent billing period of the settlement period, subject to the following,- (i) 95% of the energy so banked only will be allowed to be adjusted in the subsequent billing period of the settlement period and 5% of the banked energy shall be accounted towards banking charges of the distribution licensee.

(4) The 5% banking charges on the energy banked at the end of billing period shall not be cumulative.

(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.

(6) The prosumer, who installed the Renewable Energy System at the same premise is exempted from the payment of transmission charges, wheeling charges, transmission losses and distribution loss for the quantum of energy generated from the RE plant and adjusted against his consumption during the settlement period, in the same premises. (1) Any captive consumer, using the transmission and/or distribution system of the licensee for wheeling the energy generated from the Renewable Energy System to a different location within the State, shall pay the following charges approved by the Commission from time to time,- a. Transmission charges b. Wheeling charges c. Transmission losses and Distribution losses, and d. Any other charges approved by the Commission. Captive consumers who maintain the contract demand with the distribution licensee are required to pay transmission charges only on per unit basis at the rates as approved by the Commission from time to time.

8. Thus, as per the energy accounting and settlement procedure stipulated in the KSERC(Renewable Energy and Net metering)Regulations,2020 net metering is adopted for settling the energy generated by the prosumers and Captive consumers in the State.

Issue No.1: Introduction of 'Gross Metering/Net Billing schemes in the State

9. Net metering was introduced to promote solar generation which was in the nascent stage. However, now solar technology has achieved grid parity and significant addition in solar generation is being integrated to the grid. In this scenario, continuing 'net metering' methodology is creating heavy financial burden on the DISCOMs.

10. The demand pattern of Kerala is such that the demand during peak hours varies from that during the normal hours by 400MW to 800MW. To meet the peak demand, the costliest power in the merit order has to be scheduled. The cost of power during peak hours is very much higher than in normal hours. The average Market Clearing Price during day time is below Rs.3.50/unit, whereas during peak hours the Market Clearing Price range from Rs.4.50/unit to Rs.6.00/unit and can go even up to Rs.9-12/unit in extreme summer months. In this situation of huge variation in price of peak and other than peak time period, forcing the DISCOM to provide costlier peak power to such consumers almost at zero cost will create a huge financial liability for the DISCOM, especially with increasing RE penetration.

11. Further, in time blocks other than peak hours,the demand will be generally low and the DISCOM will have to surrender the conventional energy sources to accommodate the RE injection by the consumers, which again is at a cost as the DISCOM will have to pay fixed charges to the generators on surrender.

12. The year wise installed capacity of solar prosumers (excluding Soura scheme) till December 2022 is given in table below

Installed capacity in MW of solar prosumers					
	2017-18	2018-19	2019-20	2020-21	2021-22(upto Dec)
Total	10.21	79.16	121.71	176.28	226.61

13. In addition to the above installed capacity of 226.61MW upto December 2021, another 66.23 MW is expected to be added before 31st March 2022 under Soura Scheme.

14. The Cumulative solar capacity expected for the next five years considering solar addition anticipated is given in table below

Expected solar capacity (MW) during next five years		
	Capacity addition expected	

Year	Prosumer	under Soura scheme	Total cumulative capacity
Cumulative capacity till Dec 21			226.61
2021-22 (till Mar 22)		66.23	292.84
2022-23	73.62	150(domestic)	516.46
2023-24	102.49	100(domestic)	718.95
2024-25	143.24	100(domestic)	962.19
2025-26	195.08		1157.27
2026-27	258.02		1415.29

The solar energy generation due to the expected capacity @ CUF 0.19 as detailed in the table above is given below:

Energy addition expected (MU)					
	2022-23	2023-24	2024-25	2025-26	2026-27
Total	859.60	1196.62	1601.47	1926.16	2355.61

15. The huge addition in solar capacity as above will lead to corresponding reduction in energy sales in the coming years.

16. In this connection, following are humbly submitted:

(a) 'Net metering' and the principle of settling prosumers and captive consumers with APPC for their excess energy injection was adopted in the initial stage when there was a need for promotion of solar at large scale and when solar tariff was high. However, with rapidly declining solar tariff and the revenue loss to the DISCOMs with 'Net Metering', MoP has come out with 'Gross metering' and 'Net Billing ' schemes through "The Electricity (Rights of Consumers) Rules,2020 notified on 31-12-2020 and the Electricity(Rights of Consumers)Amendment Rules,2021 notified on 28-6-2021.

(b) In line with the above, many states have adopted 'Gross Metering' and 'Net Billing' method and have taken a different principle for settling the excess energy injection by prosumers and captive consumers, some of which are listed below.

	State	Gross Metering, Net Billing Schemes
1	Tamilnadu	The State has also introduced 'Gross Metering', 'Net Billing' schemes as follows: Net billing or Net feed-in: The monetary value of the imported energy is debited based on the applicable retail tariff; The monetary value of the exported energy is credited

		based on the feed-in tariff determined by the Commission. The monetary value of the exported energy is deducted from the monetary value of imported energy to arrive at the net amount to be billed. If the cumulative credit amount exceeds the debit amount during any billing cycle, the net credit is carried over to the next billing cycle. At the end of a 12-month settlement period, the consumer has the option to receive payment of the net credit balance (if any) or have such credit balance carried-over to the next settlement period; Gross-metering: 6.8 Gross metering is permitted for eligible consumer or generator who opt to sell all generated solar energy to the distribution licensee. An eligible consumer or generator under the gross metering scheme shall inject the entire power generated from the GISS station to the distribution system of the distribution licensee to the nearest HT network of same voltage. The exported solar energy is credited at the feed in tariff determined by the Commission. The amount is credited in the Generator/consumers electricity bill for every billing cycle or paid to the solar generator/ GISS station owner if the generator/ station owner is not a consumer; Network charges are leviable for the total energy generated in Net metering and Net billing or Net feedin mechanisms. Network charges are not applicable to Gross metering mechanism.
2	Karnataka	The State has also introduced 'Gross Metering' scheme as follows: For each billing period, in the case of gross metering, the licensee shall show the quantum of electricity exported by the eligible consumer during the billing period. In case of any import of energy is recorded in the bidirectional meter during a billing period, such energy shall be billed at a rate which is higher of the A) Tariff agreed to in the PPA. OR B) Prevailing retail supply tariff applicable to the consumer.
3	Gujarat	Banking is allowed only within one billing cycle. Peak charges are applicable for peak hour consumption of the banked energy.
4	Madhya Pradesh	The State has also introduced 'Gross Metering' scheme. Energy Accounting and Settlement for Gross Metering adopted: *(i)* For each billing period, lhe Dislribulion Licensee shall show the quantum of electricity injected into Licensee

		's system by the consumer/prosumer and quantum of electricity supplied by the Distribution Licensee, separately. *(ii)* The energy injected into Licensee 's system by the consumer/ prosumer during the billing period shall be payable by the Distribution Licensee at the rate equal to the lowest tariff rate discovered in the solar /wind bidding, as the case may be, for the Stale of MP in that Financial Year. In case no rate discovered in that financial year, the lowest tariff rate discovered in the latest previous financial year shall be considered. *(iii)* The energy supplied by the distribution Licensee during the billing period shall be billed as per the terms and conditions of applicable Retail Supply Tariff Order and Madhya Pradesh Electricit y Supply Code, 2021, as amended from time to lime.
5	Rajasthan	There are following schemes in addition to 'Net metering' (a) Net Metering arrangements; (b) Net Billing arrangements; (c) Grid Interactive Distributed Renewable Energy generating systems connected behind the meter and operating in parallel with Distribution Licensees' grid and who have not opted either for Net Metering arrangement or Net Billing arrangement: Under Net Billing entire power generated is sold to the Distribution Licensee under the Connection Agreement at the tariff agreed in the Connection Agreement with the Distribution Licensee, and the amount payable by the Distribution Licensee is reduced from the amount payable by the consumer for electricity supplied by the Distribution Licensee. The Distribution Licensee shall enter into Connection Agreement at the weighted average tariff discovered through Competitive Bidding for respective technology in previous Financial Year and adopted by the Commission, plus an incentive of 25%. In case no bidding is done in previous Financial Year, then the latest tariff discovered through competitive bidding plus an incentive of 25% shall be applicable: Provided that, in case no bidding is done for respective technology, the latest weighted average tariff of large-scale solar projects of 5 MW and more, discovered through Competitive Bidding and adopted by the Commission, plus an incentive of 25% shall be applicable:

6	Punjab	The State has also introduced 'Gross Metering' and 'Net Billing' schemes. Net Billing scheme: The Distribution Licensee shall raise bill on the prosumer in accordance with the following equation: Energy Bill of consumer = Fixed Charges + other applicable charges and levies + (EDL x TRST)- ERE x TRE) – Billing Credit (carried forward from last billing cycle); Where: a) Fixed Charges means the Fixed/Demand Charges as applicable to the consumer category as per the applicable retail supply Tariff Order; b) Other charges and levies mean any other charges such as electricity duty, municipal tax, cess, etc.; c) EDL means the energy imported from the Distribution Licensee's supply system by the Consumer for the billing cycle; d) TRST means the applicable Retail Supply Tariff of the concerned consumer category as per the applicable retail supply tariff order of the Commission; e) ERE means the energy units exported to the grid by the consumer for the billing period; f) TRE means the feed-in-tariff approved by the Commission; g) Billing Credit is the amount by which the value of solar generation in a particular billing cycle is more than the value of all other components of consumer bill. 13.3 In case the consumer is subjected to time of day tariffs, energy bill (EDL x TRST) shall be computed accordingly. 13.4 In case (ERE x TRE) is more than {Fixed charges + other applicable charges and levies + (EDL x TRST)}, utility shall give credit of amount equal to difference (Billing Credit), which shall be carried forward to the next billing cycle. 13.5 Such Billing Credit would be carried forward for the settlement period. At the end of the settlement period, if there is any outstanding Billing Credit, it shall not be paid by the distribution licensee. Gross Metering arrangement- Energy Accounting and Settlement The energy consumed by the consumer during the billing cycle shall be billed at the retail tariff applicable for the relevant category as determined by the Commission in the tariff order whereas energy generated during the billing cycle shall be billed at feed-in-tariff approved by the Commission. A single invoice may be raised by the distribution licensee.
8	Haryana	The State has also introduced 'Gross Metering' scheme as follows: . The energy accounting and settlement procedure for eligible consumers installing and operating rooftop solar PV system under gross metering arrangement shall be as per the

		following procedure: The Distribution Licensee shall reimburse the eligible consumer for the quantum of injected electricity by the rooftop solar PV system during the billing period by way of 'Solar Injection Compensation'. Provided that the energy drawl by such eligible consumer/ prosumer and energy injected by them under gross metering arrangement shall be considered as two separate transaction and the payables for energy drawn by the prosumer shall not be set off against his receivable for export of power to the distribution licensee.
9	Uttar Pradesh	The State has also introduced 'Gross Metering' scheme same as that of Haryana.

The relevant pages of the Regulations of the above states are enclosed as **Annexure-1.**

17. Considering the present scenario of Solar penetration and the developments as submitted above, it is humbly requested that 'Gross metering scheme' and 'Net Billing' scheme as envisaged in "The Electricity (Rights of Consumers) Rules,2020 notified on 31-12-2020 and the Electricity(Rights of Consumers)Amendment Rules,2021 notified on 28-6-2021 may kindly be introduced in the State as early as possible by suitably amending the KSERC(Renewable Energy and Net Metering)Regulations,2020.

18. KSEBL had earlier, on 7-10-2021 filed a petition before Hon'ble Commission to amend KSERC Regulations including KSERC (Renewable Energy and Net Metering) Regulations, 2020 in line with the rules notified by MoP. A copy of the petition is enclosed as **Annexure-2**. However, the petition has not been admitted so far for hearing.

Issue No.2: Settlement of excess energy at Average Pooled Power Purchase Cost

19. 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;"

20. 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;"

21. Hon'ble Commission in the KSERC (Terms and Conditions for determination of Tariff) Regulations, 2021 has defined "Average Power Purchase Cost" or "APPC" during a year as the weighted average cost of power purchased by the distribution licensee including the cost of self-generation by the Licensee, for the previous year as approved by the Commission.

22. It is submitted that the settling rate proposed at the end of the settling period is an additional incentive provided prosumers for the banked energy in addition to the banking facility provided to the prosumers for the full accounting year. The APPC approved by Hon'ble Commission for the FY 2021-22 is Rs.3.22/unit. This rate is significantly high compared to the prevailing rate of solar.

23. In this connection, following are humbly submitted:

Since the APPC rate is high compared to the prevailing solar tariff, many states have modified the settlement rates to be in line with the prevailing solar tariff.

	State	Settlement of excess energy injected by prosumers
1	Tamilnadu	Energy at the end of settlement period gets lapsed
2	Karnataka	DISCOM to enter a PPA with the consumer for settling the excess energy injected at a tariff.

3	Gujarat	Domestic and Government: At the rate of Rs. 2.25 per unit or the rate, if any, specified by the Commission for Surplus Injection Compensation (SIC) from time to time for the whole life of the Rooftop Solar PV System. Industries and Commercial: At the rate Rs. 1.75 per unit or the rate, if any, specified by the Commission for Surplus Injection Compensation (SIC) from time to time for whole life of the Rooftop Solar PV System. Banking is allowed only within one billing cycle. Peak charges are applicable for peak hour consumption of the banked energy.
4	Madhya Pradesh	Settlement of excess energy at the rate equal to the lowest tariff rate discovered in the solar/wind bidding, as the case may be, for the state of Madhya Pradesh. In case, no rate is discovered in that financial year, the lowest tariff rate discovered in the previous Financial year is taken.
5	Rajasthan	At the weighted average tariff of large scale solar projects of 5MW and above discovered through competitive bidding in last financial year and approved by the Commission.
6	Punjab	Electricity generated from RT Solar system shall not exceed 90% of the consumption. Energy injected in excess of 90% are not paid by the licensee and not allowed to be carried forwarded. Year end settlement is same as that of Gujarat.
7	Delhi	Domestic and Government: At the rate of Rs. 2.25 per unit or the rate, if any, specified by the Commission for Surplus Injection Compensation (SIC) from time to time for the whole life of the Rooftop Solar PV System. Industries and Commercial: At the rate Rs. 1.75 per unit or the rate, if any, specified by the Commission for Surplus Injection Compensation (SIC) from time to time for whole life of the Rooftop Solar PV System.
8	Haryana	Excess energy at the end of the settlement period gets lapsed.
9	Uttar Pradesh	Settlement at the weighted average tariff of large scale solar projects of capacity 5MW or more discovered through competitive bidding in last FY and adopted by the Commission plus an incentive of 25%.

24. The lowest rate for procurement of solar energy in recent contracts entered by KSEBL is RS.2.44/unit (PPA with SECI for 300MW Solar power, PSA with TP Sourya for 110MW Solar power).
25. Considering all the above, KSEBL request Hon'ble Commission for approving Rs.2.44/unit for settling the excess energy banked for the settlement period starting from 1st October 2021 to 30th September 2022.

26. Regulation 66 of the KSERC(Renewable Energy and Net Metering)Regulations,2022 empowers the Commission to time add, vary, alter, suspend, modify, amend or repeal any provisions of these Regulations as extracted below.
"66. Power to amend.- The Commission may from time to time add, vary, alter, suspend, modify, amend or repeal any provisions of these Regulations."

27. It is humbly requested that 'Gross metering scheme' and 'Net Billing' scheme as envisaged in "The Electricity (Rights of Consumers) Rules,2020 notified on 31-12-2020 and the Electricity (Rights of Consumers) Amendment Rules,2021 notified on 28-6-2021 may kindly be introduced in the State as early as possible by suitably amending the KSERC (Renewable Energy and Net Metering) Regulations,2020. It is also requested that Hon'ble Commission may approve Rs.2.44/unit for settling the excess energy banked for the settlement period starting from 1st October 2021 to 30th September 2022.

Prayer

KSEBL humbly request before Hon'ble Commission that:

1. 'Gross metering scheme' and 'Net Billing' scheme as envisaged in "The Electricity (Rights of Consumers) Rules,2020 notified on 31-12-2020 and the Electricity (Rights of Consumers) Amendment Rules,2021 notified on 28-6-2021 may kindly be introduced in the State as early as possible by suitably amending the KSERC (Renewable Energy and Net Metering) Regulations,2020.
2. It is also requested that Hon'ble Commission may approve Rs.2.44/unit for settling the excess energy banked for the settlement period starting from 1st October 2021 to 30th September 2022.

Chief Engineer (Commercial & Tariff)