

**KERALA STATE ELECTRICITY REGULATORY COMMISSION**  
**THIRUVANANTHAPURAM**

**Present: Shri. Preman Dinaraj, Chairman**

**Date of Hearing: 04.11.2020**

**OP No 29/2020**

In the matter of : Petition for "clarifications filed under Section 86 of the Electricity Act, 2003 that the Petitioner's newly installed 2MW solar power plant at Kalamassery is a separate unit and do not interfere with the existing 1 MW plant.

.Petitioner : Hindalco Industries Limited

Respondents : Kerala State Electricity Board Ltd.,

Petitioner represented by : Mr. Sajan Poovayya, Senior Advocate  
Mr. Ashish Prasad, Advocate  
Mr. Arpan Behl. Advocate  
Mr. Hari Kumar, Advocate  
Mr. V R Shankar, President & General Counsel,  
Hindalco  
Mr Debashish Ghosh

KSEB Ltd represented by : Sri. KGP Nampoothiri, Executive Engineer  
Smt Latha S.V, Asst Executive Engineer

**Interim Order dated 11.11.2020**

1. M/s. Hindalco Industries Ltd (hereinafter referred to as the petitioner or M/s Hindalco), on 23.09.2020, filed a petition before the Commission with the following prayers:
  - (a) Pass an order / direction/ clarification interalia, that the petitioners newly installed 2 MW solar power plant at Kalamassery is a separate unit and do not interfere with the existing 1 MW plant.
  - (b) Allow banking facility exclusively for the 2 MW solar power plant.
  - (c) Pass on the other order / direction as it deems fit and appropriate in the facts and circumstances.

2. The summary of the petition filed by M/s. Hindalco Industries Ltd is given below:
- (1) The petitioner M/s Hindalco Industries Ltd is having an industrial unit at Kalamassery. The petitioner is an EHT consumer of KSEB Ltd.
  - (2) The petitioner installed and commissioned 1MW Solar Plant in March 2016 at its premises in Kalamassery for self consumption. The said plant was registered as 'Eligible Entity' for RE Generation w.e.f 29.06.2016 with National Load Despatch Center (NLDC). Further the generation from the plant is fully used for self consumption till date. The petitioner also availed the benefit of Renewable Energy Certificate Schemes as per the provisions in Central Electricity Regulatory Commission (Terms and Conditions for Recognition and Issuance of Renewable Energy Certificate for Renewable Energy Generation) Regulations, 2010, and so far the petitioner had not availed banking facility for the 1 MW solar plant.
  - (3) The Petitioner, during the year 2020, set-up another 2 MW Solar Power Plant at the same premises for self consumption, and intended to avail banking facility as permitted under Kerala State Electricity Regulatory Commission (Renewable Energy and Net Metering) Regulations, 2020. The Petitioner approached KSEB Ltd for retaining the REC facility for the existing 1 MW Solar Power Plant and banking facility for the newly installed 2 MW plant, both are situated at the same premises. KSEB Ltd intimated the petitioner that availing both REC facility and banking facility in a single premises is the first of its kind project and hence, status quo shall be maintained subject to the approval of the Commission. KSEB Ltd further, requested the petitioner to approach the KSERC on the clarification on 'whether 1 MW and 2 MW Solar plant on the same premise can be treated as two separate Power Plants or a single unit.'
3. The respondent KSEB Ltd submitted its comments on 03.11.2020 and its summary is given below.
- (i) M/s Hindalco established two solar plants having capacity 1 MW and 2 MW at their premise and connected to the grid through same net meter.
  - (ii) The petitioner wants to retain the REC facility for its 1MW plant and also wants to avail banking facility for the 2 MW plant as per KSERC (Renewable Energy & Net Metering) Regulations, 2020.
  - (iii) The petitioner avails energy from multiple sources, including drawl from KSEB Ltd, open access and also captive generation from 1MW and 2 MW plants.
  - (iv) The petitioner avails energy through open access, in addition to availing power from KSEBL. Thus, the petitioner is having multiple sources of energy, i.e., from KSEBL, through open access and through captive solar generation. The captive solar generation of 1MW is not entitled for banking as it avail REC benefit and energy from 2MW has to be banked as per KSERC(Renewable Energy and Net Metering) Regulations,2020.
  - (v) To enable separate accounting of solar energy generation from the 1MW and 2MW solar plants, separate Special Energy Meters were insisted for

measuring solar energy generation from 1MW and 2MW solar plants. The petitioner is yet to install the same.

- (vi) KSEB Ltd requested before the Commission to clarify whether with the same connectivity to grid through same net meter, the 1MW and 2MW solar plants of HINDALCO located in same premises can be considered as separate plants with 1MW having REC facility and 2MW availing banking facility as per KSERC(Renewable Energy and Net Metering) Regulations,2020.

4. The Commission admitted the petition as OP 26/2020 and hearing conducted through video conference on 04.11.2020. The summary of the deliberations during the hearing is given below.

- (i) Adv. Sajan Poovayya, counsel of the petitioner submitted the events leading to the filing of the petition. The petitioner commissioned the 1 MW solar plant during March 2016 and availing REC benefit under CERC (Terms and Conditions for Recognition and Issuance of Renewable Energy Certificate for Renewable Energy Generation) Regulations, 2010. During 2020, the petitioner installed a 2 MW solar plant in the same premise for self consumption and energisation approval was issued by Electrical inspector on 15.06.2020. The petitioner proposed to avail banking facility for the 2 MW plant as per the KSERC (Renewable Energy and Net Metering) Regulations 2020, and also continue to avail REC benefit for the 1 MW plant. Since both the plants are at same premise, the Hon'ble Commission may clarify 'whether the 1MW and 2 MW solar plant at the same premise can be treated as two separate power plants or as a single unit'.

The counsel also submitted that, CERC (Terms and Conditions for Recognition and Issuance of Renewable Energy Certificate for Renewable Energy Generation) Regulations, 2010, and the detailed procedure for REC accreditation approved by CERC provides for installing more than one plant in a single premise. Paragraph 3.1 of the procedure for accreditation of RE Generation projects approved by the Central Commission, provides that in case the applicant has multiple RE generation projects then separate application will have to be submitted by the Applicant for each RE generation project. Accreditation of each RE generation project shall be carried out separately.

The petitioner clarified during the hearing that, the solar power generated from both the plants is evacuated through the same net meter to the same grid, however separate solar meter installed for both the Solar Power Plants.

- (ii) Mr Debashish Ghosh, on behalf of the petitioner further submitted that there is no technical issue in connecting the two plants with the grid. The consumer is connected to KSEB Ltd system at 110kV level, but the solar plants are connected at 11kV level. The petitioner shall ensure that there is no power flow from 1 MW plant to grid, and for ensuring the same the petitioner is willing to provide automatic interlock facilities. The petitioner further submitted that, availing separate connections for both the plants at 11 kV may not be possible.

- (iii) Sri. K. G. P. Nampoothiri, representing KSEB Ltd submitted that, the detailed comments on the petition is already submitted before the Commission. KSEB Ltd further submitted that, at present the electricity generated from both the solar plants are evacuated through same net meter. To enable separate accounting of solar energy generation from the 1 MW and 2 MW plants, separate meters were insisted, but the petitioner yet to install the same. KSEB Ltd also raised concern about the safety of the interlocking facilities proposed by the petitioner.
  - (iv) Commission noted that, KSEB Ltd in its written submission proposed a methodology for separate energy accounting of solar energy generated from both the 1 MW and 2 MW plants in same premise using a common net meter arrangement. Commission directed KSEB Ltd to provide a copy of the comments of KSEB Ltd to the petitioner for their comments.
5. Based on the deliberations during the hearing, the Commission hereby direct the Petitioner M/s HINDALCO and the respondent KSEB Ltd for immediate compliance, latest by 27.11.2020.
- (i) The petitioner may take steps to implead SLDC, ANERT and Electrical Inspector as respondents to the petition.
  - (ii) M/s Hindalco may submit a detailed report on the proposed interlocking facility, and also the procedure proposed for accounting of energy generated from both the 1 MW and 2 MW plants separately, energy availed from KSEB Ltd, energy import through open access etc.
  - (iii) Alternatively, installation of separate net meters for each of the solar units with physical separation of the lines may also be explored and a detailed report submitted

Next hearing on the petition is scheduled on 2<sup>nd</sup> December 2020.

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

Approved for issue

C R Satheeshchandran  
Secretary ( i/c)