

**KERALA STATE ELECTRICITY REGULATORY COMMISSION  
THIRUVANANTHAPURAM**

**Present: Shri. T.M. Manoharan, Chairman  
Shri. Mathew George, Member**

**O.P No.24/2014**

**In the matter of Seeking modification in the Regulation 13 of the Kerala State  
Electricity Regulatory Commission (Grid Interactive Distributed  
Solar Energy Systems) Regulations, 2014**

**Petitioner** - Kerala State Electricity Board Ltd

**Order Dated: 24<sup>th</sup> December 2014**

1. Commission vide notification dated 10-06-2014 has issued Kerala State Electricity Regulatory Commission (Grid Interactive Distributed Solar Energy Systems) Regulations, 2014 applicable to all the distribution licensees in the State and to consumers availing electricity at voltage of and below 11000 volts. The regulation came into effect from 30-06-2014.
2. KSEB Ltd has submitted an application on 01-10-2014 under Regulation 18(1) and 19 of KSERC (Grid Interactive Distribution Solar Energy System) Regulations, 2014, seeking modification in Regulation 13 in the matter of procedure for granting connection to solar energy systems. Kerala State Electricity Board Ltd has submitted the following prayers.

**Prayers**

3. The prayers of the petitioner are
  - (i) The connectivity procedure shall be made online and through single window approach dealt directly under the corporate office of the licensee.
  - (ii) The application and the registration processes may be clubbed together, such that the eligible consumer should make the request for registration in the first instance itself, by remitting both application fee and registration fee for the proposed capacity.
  - (iii) Pre-commissioning and routine testing shall be chargeable activities, if the licensee is requested to do the same.

## **Hearing of Petition and analysis**

4. The public hearing was conducted on 27-11-2014 after duly notifying the same in website of the Commission. Shri. D. Padmakumar, Executive Engineer and Shri. C.S. Sarma Kumar, Deputy Chief Engineer (TRAC) represented KSEB Ltd.
5. The first prayer is related to the procedure for granting of connectivity. As per the Regulation 13(1) of the Solar Energy Regulation 2014, the eligible consumer who proposes to install solar energy system in his premises shall apply to the local office for permission to connect the solar energy system to the distribution feeder of the licensee. Along with the application he has to remit fees specified for the purpose. As per sub regulation (2) of Regulation 13, the licensee can acknowledge the receipt of the application form and register the application and shall process the application in the order of its receipt. KSEB Ltd submitted that the application received at a local office, can be processed in the order of the receipt of the application, but installation of the net metering system cannot be made in the order of the date of application while considering the State as a whole. It is submitted that the procurement of meters at KSEB Ltd is centralized and allotment is being done based on the availability. Hence it can happen that a consumer who has submitted an application in a particular month in a local office may not receive the grid connection, where as a consumer of a nearby section who has applied in the subsequent month may receive the grid connectivity due to the delay attributable to conventional paper based office practices. Moreover implementation of the connectivity strictly on the basis of seniority of the application can be implemented only if centralized system is adopted. Therefore KSEB Ltd has proposed to an online connectivity procedure through single window approach dealt directly by the corporate office which will resolve these issues and make the connectivity procedure centralized, transparent, customer friendly and simple. It has also submitted that all the local offices of the distribution licensee are already computerized and networking is going on. Therefore the communication from corporate office to concerned local office and the implementation of online connectivity is very easy.
6. The issue has been considered in detail in the arguments presented by Sri G.Padmakumar, Executive Engineer, KSEB Ltd. The argument placed by the licensee for the change in procedure from the decentralized system to centralized system does not appear to be rational or pragmatic for the following cases. An applicant in a remote village who proposes to install a roof top solar system has to apply online to central office as KSEB Ltd. This applicant need not necessarily have a personal computer and net connectivity. Further when application is submitted directly to the head office, if applicant wants to know the present status of his application he has to invariably approach the head office either in person or through internet system. Section offices will not be in a position to clarify any of the queries

of the consumer since they will be ignorant of his application. As submitted by KSEB Ltd, all local offices are computerized and are having networking system. Nothing prevents KSEB Ltd to collect data which the head office requires from the local offices through their own centralized networking system. Further all the technical particulars required for granting connectivity is available in local offices only. The major points considered for granting connectivity are capacity of transformer and local distribution feeder. If application is submitted to the central office naturally central office will have to collect details from the local office. The licensee who is anxious about delay attributable to conventional paper work has to explain how the delays for collecting data from field offices can be avoided. All over the world decentralized processes are in vogue to ensure transparency and customer friendly practices. Hence licensee has to decentralize the process for connectivity to ensure transparency and to make the connectivity procedure simple and customer friendly. The procedure has to be simple, transparent and customer friendly. Customer in need of service should be able to contact the nearest section office and interact with the local staff. Therefore procedure proposed by the KSEBL will only increase the paper work and increase difficulty to the consumer.

7. In the second prayer relating to process for receiving application and registration. KSEBL submitted the following:

*“The application and the registration processes may be clubbed together, such that the eligible consumer should make the request for registration in the first instance itself, by remitting both application fee and registration fee for the proposed capacity.”*

8. The present procedure has been evolved and incorporated in regulation only after detailed thought process. If a person seeks connectivity, the feasibility depends on two factors, namely capacity of transformer and the load connected to the feeder. The connectivity to a feeder is governed by regulation 5(2) quoted below.-

*“5 (2) The distribution licensee shall give connectivity to the solar energy system of any eligible low tension consumer only till the cumulative capacity of the solar energy systems connected to a particular low tension distribution feeder is less than eighty percent of the average minimum load of all the consumers of the said feeder between 8 am and 4 pm during the period of seven days succeeding the date of submission of the application form by the eligible consumer for connecting the solar energy system to the said feeder.”*

9. As soon as the application is received, the local office can inform the consumer whether the present capacity of transformer and load of feeder would permit such connectivity. Only if technically feasible, the consumer need to register for connectivity paying the fees specified for same. Fees have been specified with a view to discouraging consumers who are not serious about getting connectivity.

10. The scheme of giving connectivity to low tension feeder specified in Regulation 5 is quoted as follows:

*“5. Obligation of the distribution licensee to give connectivity to the low tension feeders .- (1) The distribution licensee shall, without any discrimination, provide to the eligible low tension consumer in its area of supply, the connectivity to its low tension feeder for installing the solar energy system subject to compliance with the other provisions as per these regulations and the technical limit specified in sub-regulation (2).*

*(2) The distribution licensee shall give connectivity to the solar energy system any eligible low tension consumer only till the cumulative capacity of the solar energy systems connected to a particular low tension distribution feeder is less than eighty percent of the average minimum load of all the consumers of the said feeder between 8 am and 4 pm during the period of seven days succeeding the date of submission of the application form by the eligible consumer for connecting the solar energy system to the said feeder.*

*Provided that the distribution licensee may adopt the average minimum load of the low tension distribution feeder assessed between 8 am and 4 pm within a period of six months prior to the date of submission of the application form, if the licensee is convinced that there has been no considerable change of load in the said feeder after the previous assessment.”*

11. Thus it can be seen that the two stage procedure of application and registration is more consumer friendly.
12. The third issue presented by KSEBL relates levy of fees for pre-commissioning and routine testing of the net metering system. In this regard Commission is directing KSEB Ltd to submit the following so that the proposal can be considered in detail.
1. Schematic diagram of Grid Interactive Solar Energy Systems with all particulars of equipments and insulations.
  2. The details of pre-commissioning test to be conducted, and expenditure to be incurred by the licensee for such tests.

### **Order of the Commission**

13. The Commission disposes of the petition with the following orders.

- (1) The request of KSEB Ltd that the connectivity procedure shall be made online and through single window approach dealt directly under Corporate office of the licensee is declined, since the present system, by which the consumer is offered the facility for submission of application at local section office is more consumer friendly. However KSEB Ltd is free to upload the data at section offices and obtain centralized information at corporate level for planning and monitoring.
- (2) The request of KSEB Ltd. that the application and the registration process may be clubbed together, such that the eligible consumer should make the request for registration in the first instance itself, by remitting both application fee and registration fee for the proposed capacity, is declined.
- (3) For the request of KSEB Ltd. that pre-commissioning and routine testing shall be chargeable activities, Commission directs KSEB Ltd to file a petition with the following information to enable the Commission to consider whether there is justification to levy charges for pre commissioning and routine testing.
  - (i) Schematic diagram of Grid Interactive Solar Energy Systems with all particulars of equipments and installations.
  - (ii) The details of pre-commissioning test to be conducted and the expenditure to be incurred by the licensee for such tests.

Dated this the 24<sup>th</sup> day of December, 2014

Sd/-  
Mathew George  
Member (F)

Sd/-  
T.M.Manoharan  
Chairman

Approved for issue

Secretary