

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

**Present : Shri T K Jose, Chairman**  
**Shri B Pradeep, Member**  
**Adv. A.J Wilson, Member**

**Petition: OP No. 37/2023**

In the matter of : Petition seeking exemption of RTU and SCADA visibility at injection points.

Petitioners : M/s Malayakam Aggregates & Sands Pvt. Ltd

Petitioner represented by : Shri. Arun Varghese, project Manager  
Respondents : Kerala State Electricity Board Ltd (KSEB Ltd)  
State Load Dispatch Centre (SLDC)

KSEB Ltd represented by : Shri. M.P.Rajan, Dy CE, TRAC  
Smt. Latha.S.V, AEE, TRAC

SLDC Represented by : Shri. Viju Rajan John, Chief Engineer, TSO  
Smt. Kavitha C.K, Dy CE (Grid)

Date of hearing : 06.07.2023, 10:30 AM

Venue : Court Hall of the Commission

**Petition: OP No. 38/2023**

In the matter of : Petition seeking exemption of RTU and SCADA visibility at injection points.

Petitioners : M/s KIK Plastics Private Limited

Petitioner represented by : Shri. K.K.Ibrahim, Managing Partner  
Respondents : Kerala State Electricity Board Ltd (KSEB Ltd)  
State Load Dispatch Centre (SLDC)

KSEB Ltd represented by : Shri. M.P.Rajan, Dy CE, TRAC  
Smt. Latha.S.V, AEE, TRAC

SLDC Represented by : Shri. Viju Rajan John, Chief Engineer, TSO  
Smt. Kavitha C.K, Dy CE (Grid)

Date of hearing : 06.07.2023, 10:30 AM

Venue : Court Hall of the Commission

**Petition: OP No. 39/2023**

In the matter of : Petition seeking exemption of RTU and SCADA visibility at injection points.

Petitioners : M/s KK Plastics

Petitioner represented by : Shri. K.K.Ibrahim, Managing Partner

Respondents : Kerala State Electricity Board Ltd (KSEB Ltd)  
State Load Dispatch Centre (SLDC)

KSEB Ltd represented by : Shri. M.P.Rajan, Dy CE, TRAC  
Smt. Latha.S.V, AEE, TRAC

SLDC Represented by : Shri. Viju Rajan John, Chief Engineer, TSO  
Smt. Kavitha C.K, Dy CE (Grid)

Date of hearing : 06.07.2023, 10:30 AM

Venue : Court Hall of the Commission

**Common Daily Order dated 10.07.2023**

1. M/s Malayakam Aggregates & Sand Pvt Ltd, M/s KIK Plastics and M/s KK Plastics (hereinafter referred as petitioners) on 10.01.2023, filed three separate petitions before the Commission with the following common prayers;

(1) *“Exempt them 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.”*

2. The Commission admitted the petitions as OP No. 37/2023, 38/2023 and 39/2023 respectively. Hearing on the petition was held on 06.07.2023 at the Court Hall of the Commission. Shri. Arun Varghese and Shri. K.K.Ibrahim, appeared on behalf of the Petitioners. Smt Latha, AEE, TRAC, presented the comments on behalf of the Respondent KSEB Ltd. The deliberations during the hearing are summarized below.

- (1) The petitioners submitted the following during the hearing;

The petitioners had established three wind power projects, each having capacity 250KW(1×250KW) at Ramakkalmedu. The Commission vide Common Order dated 18.01.2023 in petitions OP No.65/2022, OP No.66/2022 and 67/2022 had exempted them the installation of SEM meters at drawal points. As per the Regulation-36(1) of the KSERC(Connectivity and Intra State Open Access) Regulations,2013(hereinafter referred as Open Access Regulation, 2013)

the Commission has the powers to exempt the petitioners from the installation of Special energy meters, RTU and SCADA visibility at injection point also. The petitioners have already installed SEM meters in the injection point

The petitioner submitted that they may receive the yearly generation of about 4 lakhs units/year each from the project and they will have to incur a cost of around 14 lakhs each for the installation of RTU. Further the existing structures provided has to be upgraded and one unit of CT and PT has also to be provided to each of the WEG. Moreover, the overall cost will be increased by providing RTU and SCADA visibility.

The petitioner further submitted that as per the Regulation- 11(4) of the Open Access Regulation,2013 the Distribution licensee shall install the Remote Terminal Units (RTU) in the premises of the applicant with in the stipulated time as per the detailed procedure. Hence, if the Commission cannot exempt the petitioners from the installation of RTU and SCADA visibility at injection point, the licensee may install the same at the injection point of the petitioner as per the above Regulation.

The petitioner further clarified that their developer M/s Ramakkalmedu Power Private Ltd had received technical approval for the installation of 8x250KW Wind Energy Generators (WEGs) at Nedumkandam, Ramakkalmedu. Out of 8(8x250KW) WEGs, 5(5x250KW) WEGs(3x250KW- installed by the petitioners, M/s Greenland Papper Mill Ltd(1x250KW) and M/s C V Renewables(1x250KW)) are installed and the works for the installation of 3WEGs(3x250KW- installed by M/s Shiva Electricals) are undergoing. The petitioners had constructed a 33KV pooling station at Ramakkalmedu and it is connected to the Kallar substation of KSEB Ltd via dedicated feeder.

- (2) During the hearing, the Respondent KSEB Ltd submitted the following;

As per the Regulation-24(2) of the KSERC(Renewable Energy and Net Metering) Regulations, 2020(hereinafter referred as RE Regulations,2020), the metering system shall have RTU to facilitate real time monitoring to SLDC. Further, as per the Regulation-11(4) of the Open Access Regulation,2013, before granting the open access, the nodal agency shall ensure that RTU are installed and maintained. As per the above the petitioners are mandated to provide RTU at injection point.

However, the contention of the petitioner that exemption for the installation of RTU and SCADA visibility can be granted as per the Regulation- 36(1) of the Open Access Regulation,2013, is not right, since, the exemption is applicable to the SEM meters only. Hence, as per the Regulations, there are no exemptions for installation of RTU and SCADA visibility.

KSEB Ltd further submitted that the Renewable Energy (RE) additions to the grid of KSEB Ltd are increasing day by day and SLDC needs to monitor the variations in generation due to these infirm RE additions. KSEB Ltd further submitted that, if small Renewable Energy Generators (REGs) are connected under the pooling station, the RTU and SCADA visibility can be provided at that pooling station for the visibility of SLDC, instead of providing separate RTU and SCADA visibility to the REGs.

- (3) SLDC submitted the following;

SLDC Kerala submitted that, as per the Open Access Regulations, 2013 the installation of RTU facility for the monitoring of SLDC is a precondition for the granting of Open Access. Moreover, considering the increase in renewable energy penetration, the existing provisions in the Regulations have to be fully complied with. SLDC opined that the RTU and SCADA visibility can be provided at the pooling station of the small REGs totalling up to one MW and above. Hence, SLDC submitted that the installation of RTU and SCADA visibility at the pooling station of REGs will meet the requirements of SLDC.

- (4) Based on the deliberations during the hearing the Commission directed the petitioners to clarify whether, the developers who are established/proposed to establish total 8nos(8x250KW) WEGs at Ramakkalmedu are willing to share the cost of installing RTU and SCADA facility at the pooling station developed by their developer M/s Ramakkalmedu Power Private Ltd. The petitioners of the instant petitions OP No. 37/2023, 38/2023 and 39/2023 expressed their willingness to share the cost for the installation of RTU and SCADA visibility at the pooling station. But, the Commission clarified to the petitioners that it can take a considered decision regarding the sharing of cost only after hearing all the interested parties.

- (5) The Commission directed SLDC and KSEB Limited to submit their opinion regarding threshold capacity limits for the installation of RTU and SCADA visibility for individual stations and pooling stations for evacuation of power from Renewable Energy Plants.

3. Based on the deliberations during the hearing, the Commission hereby direct the petitioners and the respondents to comply the following.

- (1) The petitioners shall implead the other developers, who have established/ establishing WEGs at Ramakkalmedu and getting connected to the common pooling station at Ramakkalmedu.

- (2) The developers of the 8(8×250KW) WEGs shall submit a joint affidavit substantiating the detailed scheme of cost sharing among 8(8×250KW) WEGs for setting up RTU and SCADA visibility at common pooling station at Ramakkalmedu, latest by 24.07.2023 at 05:00 PM, with a copy to KSEB Ltd and SLDC
- (3) The Respondents KSEB Ltd and SLDC shall submit the comments on establishing RTU and SCADA visibility by the licensee/STU and regarding threshold capacity limits for the installation of RTU and SCADA visibility for individual stations and pooling stations for evacuation of power from renewable energy plants, latest by 24.07.2023 at 05:00 PM, with copy to petitioners.

Next hearing on the subject petition is scheduled on 25.07.2023 at 04:00 PM.

Sd/-  
**Adv. A J Wilson**  
Member

Sd/-  
**B Pradeep**  
Member

Sd/-  
**T K Jose**  
Chairman

Approved for issue

Sd/-  
C R Satheeshchandran  
Secretary