

**Maharashtra State Electricity Distribution Co. Ltd.**

(A Govt. of Maharashtra Undertaking)

CIN : U40109MH20005SGC153645

PHONE No. 26474753 (P)/26474211 (O)  
FAX No. 26472366  
Email: [cecomm@mahadiscom.in](mailto:cecomm@mahadiscom.in)  
Website: [www.mahadiscom.in](http://www.mahadiscom.in)

PLOT No. G-9, PRAKASHGAD  
Prof. ANANT KANEKAR MARG  
BANDRA (East)  
MUMBAI-400051

No. Comm/Petition / **No 13021** Date:

**23 MAY 2017**

To,  
**Secretary,**  
Maharashtra Electricity Regulatory Commission,  
Mumbai

Sub: Filling of petition for removal of difficulties in implementation of MERC (Distribution Open Access) Regulation, 2016, (Provision of Banking) .

Ref: MERC (Distribution Open Access) Regulation 2016.

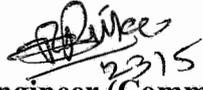
Dear Sir,

Please find enclosed herewith the MSEDCL petition for removal of difficulties in implementation of MERC (Distribution Open Access) Regulation, 2016, (Provision of Banking) .

The requisite fee is submitted herewith in the form of demand draft no 218825 .  
dt 23/5/2017 .

Thanking You,

Yours faithfully,

  
23/5  
Chief Engineer (Commercial)

Copy S.w.r. to:-

- 1) The Executive Director, Dist. I/ (Commercial), MSEDCL, Mumbai.

Copy s.w.c.to:-

- 1) Reliance Infrastructure Ltd, W.E Highway, Dindoshi, Goregaon (East), Mumbai-400097.
- 2) Tata Power Company Ltd, Dharavi Receiving Station, Near Shalimar Ind.Estate, Matunga, Mumbai-400019.
- 3) Chief Engineer, STU, Prakashganga, Bandra-Kurla Complex, Bandra (E).

Copy to:

- 1) Maharashtra Energy Development Agency, II Floor, MHADA Complex, Tridal Nagar, Pune-411006.
- 2) Prayas (Energy Group), Amrita Clinic, Athawale Corner, Deccan Gymkhana Karve Road, Pune 411 004.
- 3) Mumbai Grahak Panchayat, Grahak Bhavan, Behind Cooper Hospital, Vile Parle (West), Mumbai 400 056.
- 4) The General Secretary, Thane Belapur Industries Association, Robale Village, Post Ghansoli, Navi Mumbai 400 701.
- 5) Vidarbha Industries Association, 1<sup>st</sup> Floor, Udyog Bhavan, Civil Line, Nagpur 440 001.



बैंक ऑफ महाराष्ट्र  
Bank of Maharashtra

28/05/2017  
D D M M Y Y Y Y

00164-MUMBAI BANDRA EAST

MAHARASHTRA ELECTRICITY REGULATORY

218825

माँग कि जाने पर प्राप्त राशि के निमित्त

ON DEMAND PAY

COMMISSION\*\*\*\*\*

को या उनके आदेश पर/OR ORDER

रुपये  
RUPEES

Ten Thousand only.

₹

\*\*\*\*\*10,000.00

अदा करें FOR VALUE RECEIVED

बैंक ऑफ महाराष्ट्र FOR BANK OF MAHARASHTRA

एह दह एला दला  
OT TT TL

39DLL



*[Signature]*

बैंक ऑफ महाराष्ट्र BANK OF MAHARASHTRA  
01001-MUMBAI SERVICE BRANCH

प्राधिकृत अधिकारी / AUTHORISED OFFICIAL/S

Please sign above

MANIPAL TECHNOLOGIES LTD., MANIPAL, CTS 2010  
विवरण की जांच के लिए तीन महीने के भीतर  
VALID FOR THREE MONTHS FROM THE DATE OF ISSUE

⑈ 218825⑈ 000014000⑈

16

**BEFORE THE MAHARASHTRA ELECTRICITY REGULATORY  
COMMISSION, MUMBAI**

Case No. /

**IN THE MATTER OF:**

**PETITION FOR REMOVAL OF DIFFICULTIES IN  
IMPLEMENTATION OF MERC (DISTRIBUTION OPEN ACCESS)  
REGULATIONS, 2016, (PROVISION OF BANKING).**

**IN THE MATTER OF:**

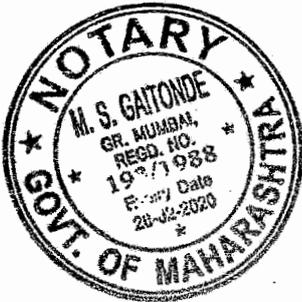
Maharashtra State Electricity Distribution Company Limited

.... Petitioner

***Affidavit***

I, Sharad Rinke, Aged 57 years, having my office at Maharashtra State Electricity Distribution Co. Ltd., Prakashgad, Plot No.G-9, Anant Kanekar Marg, Bandra (East), Mumbai-400 051 do solemnly affirm and state as under :-

1. That I am Chief Engineer (Commercial) of Maharashtra State Electricity Distribution Co. Ltd., Petition in the above matter has been duly authorized on behalf of the MSEDCL.



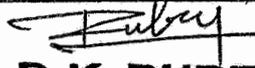
2. The averments made in the enclosed petition are based on the information received from concerned officers of the Company and I believe them to be true.

3. I say that there are no proceedings pending in any court of law/tribunal or arbitrator on any authority, where the Petitioner is a party where issues arising and /or reliefs sought are identical or similar to the issues arising in the matter pending before the commission.

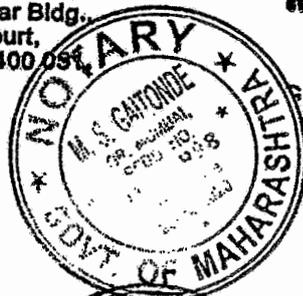
4. I solemnly affirm at Mumbai on this <sup>23<sup>rd</sup></sup> Day of May 17 that the contents of this affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there from.

  
Chief Engineer (Commercial)  
MSEDCL

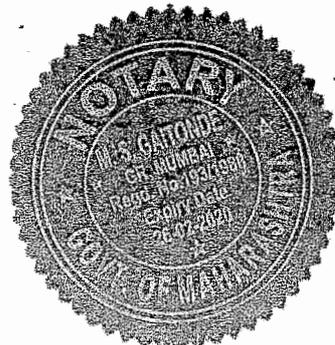
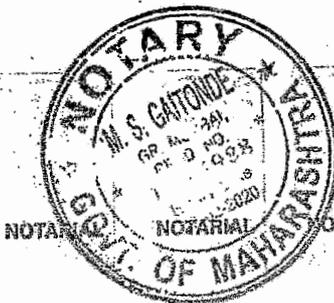
Identified before me

  
**P. K. DUBEY**  
B.A.L.L.B.  
ADVOCATE HIGH COURT  
Lawyer's Chamber Bhaskar Bldg,  
2nd Floor, Bandra Court,  
Bandra (East), Mumbai - 400 095

BEFORE ME  
  
**M. S. GAITONDE**  
NOTARY BALLM  
GREATER MUMBAI  
GOVT OF MAHARASHTRA  
INDIA



NOTED	REGISTER
Sr. No. 1454	23-5-2017



FILING NO:

CASE NO:

IN THE MATTER OF

PETITION FOR REMOVAL OF DIFFICULTIES IN IMPLEMENTATION OF MERC (DISTRIBUTION OPEN ACCESS) REGULATIONS, 2016, (PROVISION OF BANKING).

AND

IN THE MATTER OF

REGULATION 20 OF THE MERC (DISTRIBUTION OPEN ACCESS) REGULATIONS, 2016 (PROVISION OF BANKING)

IN THE MATTER OF

MAHARASHTRA STATE ELECTRICITY DISTRIBUTION COMPANY LIMITED – THE PETITIONER

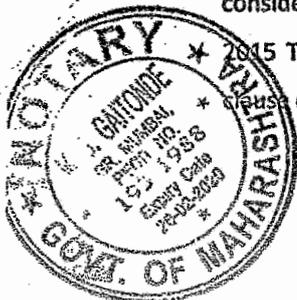
Maharashtra State Electricity Distribution Company Ltd. respectfully submits as under:

**1. Background**

1.1. The Petitioner is a Company constituted under the provisions of Government of Maharashtra, General Resolution No. PLA-1003/C.R.8588/Energy-5 dated 25th January 2005 and is duly registered with the Registrar of Companies, Mumbai on 31st May 2005.

1.2. The Petitioner is functioning in accordance with the provisions envisaged in the Electricity Act, 2003 and is engaged, within the framework of the Electricity Act, 2003, in the business of Distribution of Electricity to its consumers situated over the entire State of Maharashtra, except Mumbai City & its suburbs (excluding Mulund & Bhandup).

1.3. The Petitioner submits that Hon'ble Commission has issued the Distribution Open Access Regulations, 2016 vide No. MERC/Tech/Open Access Distribution/2016/01742 dated 30th March, 2016 (Herein after to be referred as Distribution Open Access Regulations 2016"). The Petitioner submits the Distribution Open Access Regulations, 2016 has still issue in Regulation 20 "Banking of Renewable Energy generation" despite MSEDCL had submitted to the Hon'ble Commission vide its letter No.SE/TRC/38109 dated 31st October 2015 for consideration during comments/ suggestions on Draft Distribution Open Access Regulations 2015. Therefore, the Petitioner approaching the Hon'ble Commission for amendments in Regulation 20 of MERC (Distribution Open Access) Regulations 2016.



## 2. BANKING OF RENEWABLE ENERGY GENERATION

2.1 Regulation 20 of the Open Access Regulations 2016 provides for the banking of the renewable energy generation. As per the said Regulation, surplus energy from a "non-firm" renewable energy generating station after set off shall be banked with the Distribution Licensee. The said Regulation is annexed hereto as Annexure I.

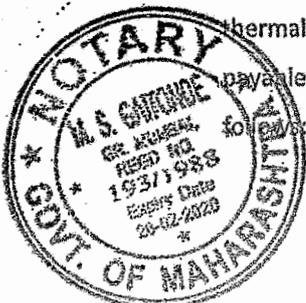
2.2 The Petitioner humbly submits that, by virtue of above Regulations the infirm RE generators are availing following benefits over firm energy sources:

- a) Exemption from scheduling.
- b) Monthly ToD wise banking facility.
- c) Yearly ToD wise banking facility.

2.3 The Petitioner humbly submits that the 'banking' provision allows renewable power generators to inject surplus power into the grid when the power cost is less and draw the power back for consumption during the peak period when the power cost is high, which in turn puts additional financial burden over the licensee, which in turn is passed on to the common consumers of MSEDCL. Very selective and few consumers who are using open access through RE and taking benefit of Banking are benefiting from the said provision of banking at the cost of common consumers.

2.4 The petitioner respectfully submits that the energy generation from wind generators is at the peak in the months of June to September in a calendar year and particularly in the night hours when the MSEDCL demand is minimum during the year. The market price of the power is least/ minimum during these months. During this period the consumer/generator bank the surplus energy injected in to the grid and draws it back from grid in the months when the MSEDCL demand and power purchase cost is more. MSEDCL's common consumer has to bear this difference in the cost of power which in turn is passed on to other common consumers.

2.5 It is respectfully submitted that MSEDCL has tied up about 5,500 MW of Thermal power through competitive bidding and is already in surplus power scenario. Also it is expected to get additional 10,000 MW from CGS/SGS in next 4-5 years. Under this situation due to further over injection from renewable energy sources, MSEDCL has to back down the thermal generation to the extent of these banked units and has to bear the fixed charges payable to the thermal generators. The power backing down scenario is elaborated as



A) The total contracted capacity of MSEDCL (2016-17) is as below:

Sr. No.	Source	Capacity in MW
01	Thermal	10370
02	Hydro	2585
03	Gas	672
04	Central Sector	5778
05	Renewable (Including Solar, biomass, bagasse, SHP)	5219
	Total	24628

The following data in table shows that, the Renewable Injection MU's and MSEDCL back down MU's are nearly matching:

Table-1

Month	Apr'1 6	May' 16	June' 16	Jul' 16	Aug' 16	Sept' 16	Oct'1 6	Nov' 16	Dec' 16	Jan' 17	Feb' 17	Mar' 17
MSEDCL Max Demand in MW	17411	17176	16779	13830	16063	17881	18013	18116	17764	18283	18830	19745
RE Power Injection in MUs	663	891	917	1044	1055	640	373	531	742	719		
MSEDCL Back down in MUs	358	599	1046	1134	807	1082	696	946	907	798	305	421

2.6 MSEDCL has worked out the actual difference between the variable cost of power at the time of banking of surplus units that is lowest variable cost of backed down power and at the time of utilization of this banked units that is highest variable cost of on-bar power or IEX, whichever is higher, in each 15 min time slots for the period from April 2016 to March 2017 considering banked units of all consumers availing banking facility. The sample detail working sheets for the month of July 2016 are attached as Annexure-II. The total amount of difference is worked out to be Rs. 11.02 Crs for full years. The abstract sheet is attached as Annexure-III. This much loss has been caused to MSEDCL's consumers by 228 consumers taking banking facility. The abstract is as under:



Over Injection Details			Total Cost at Credit (Rs. Crs)	Difference in Rs. Crs. (Cost at Credit - Cost at Banking)
Month	Units in Mus	Cost at Banking in Rs. Crs.		
APR-2016	9.24	2.33	2.57	0.25
MAY-2016	26.15	5.81	7.38	1.57
JUN-2016	29.67	6.24	8.11	1.88
JUL-2016	32.35	5.43	8.49	3.06
AUG-2016	28.20	5.11	7.46	2.34
SEP-2016	10.78	2.00	2.95	0.95
OCT-2016	4.57	0.95	1.11	0.16
NOV-2016	5.38	1.19	1.48	0.29
DEC-2016	5.56	1.25	1.53	0.28
JAN-2017	2.57	0.61	0.73	0.12
FEB-2017	2.79	0.75	0.81	0.07
MAR-2017	3.06	0.84	0.91	0.07
<b>TOTAL</b>	<b>160.33</b>	<b>32.5</b>	<b>43.53</b>	<b>11.02</b>

In the above table, out of 160.33 Mus : 72.58 MUs are adjusted through ToD adjustment and 87.75 MUs are adjusted through credit in subsequent months (except April, May, October and November).

2.7 The details of methodology adopted by MSEDCL is as under:

- i. The injection and credit of units to OA consumer are first adjusted in 15 mins time block (adjustment in terms of units).
- ii. The surplus units injected in every 15 mins time block are banked at lowest variable cost of backdown power in that 15 min time block.
- iii. The credit of banked units to OA consumer through ToD adjustment in same month or through adjusted in subsequent months is calculated in terms of cost i.e. at highest variable on-bar cost or cost of purchase through IEX, whichever is higher in that 15 min time block.
- iv. The banking of units is done at lowest variable cost of backdown power in every 15 min time block, as most of the generation is during off peak season. Due to injection of surplus power in grid (for which MSEDCL has no EPA), MSEDCL has to backdown its own generation by paying the fixed charges.

The credit of units is done at highest variable cost of on-bar power in every 15 min time block, as most of the credit is during peak season. MSEDCL has to procure additional expensive power to fulfill the banking obligation.



The month-wise details of banked units and offset units are as under:

Month	Current Month Banked units in Mus	Previous Banked Offset Units in Mus
Apr-16	9.57	0.00
May-16	11.40	0.00
Jun-16	23.86	7.75
Jul-16	31.44	7.72
Aug-16	29.69	8.63
Sep-16	10.72	17.64
Oct-16	0.59	0.00
Nov-16	1.59	0.00
Dec-16	3.87	20.00
Jan-17	0.67	15.72
Feb-17	0.80	5.92
Mar-17	0.80	4.36
Total	125.00	87.75

From the above, it is clear that, maximum units are banked during off-peak season and credit is availed during peak season. Also, it is pertinent to note that, the HT sale of MSEDCL during the period from December to March is reduced by 46 MUs due to offset of units banked during off-peak season. This has a direct financial impact of Rs. 40 Crs considering ABR of Rs 8.57 per unit for HT Industrial consumers for FY 2016-17.

- vi. By providing the banking facility in terms of currency settlement, MSEDCL will be revenue neutral.
- vii. The calculation has been carried out through IT programming and the same can be shared with MERC for verification.

2.8 Extending this concessional promotional benefit of banking will affect not only the common consumers of the State but also financial position of MSEDCL and hence the concessional / promotional benefit of banking facility may be changed to make it revenue neutral to both consumers availing banking and MSEDCL and its consumers.

2.9 It is respectfully submitted that the banking facility in some states such as of Gujarat, Rajasthan and Karnataka is on monthly basis as below.



S NO	CRITERIA	GUJARAT	RAJASTHAN	KARNATAKA
1	ELIGIBILITY	Only captive	Only captive	All
2	PERIOD	Monthly basis	Monthly basis	1. Monthly basis for captive under REC. 2. Yearly for others
3	CREDIT	credit in same month only in terms of ToD adjustment	credit in same month only in terms of ToD adjustment	credit in same month for captive under REC. yearly for non REC captive and third party
4	CONDITIONS	NIL	NIL	NIL
5	PURCHASE	1. NON REC : 85% of feed in tariff. 2. REC : @APPC	Balance 10% at 60% of IND Tariff	Unutilised energy @ 85% of feed in tariff

Thus the seasonal variation in the prices of energy does not burden the distribution licensee and the common consumers thereof.

### 3. MSEDCL's PROPOSAL FOR BANKING METHODOLOGY OF INFIRM RENEWABLE ENERGY TO MAKE IT REVENUE NEUTRAL.

#### 3.1 MSEDCL respectfully submit that instead of providing the banking in terms of MUs;

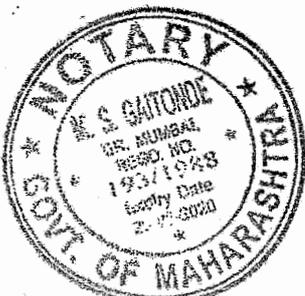
**Step 1:** The surplus banked units from the renewable sources in a month shall be treated as banked in terms of rupees currency by MSEDCL at the lowest variable cost of power purchase for respective 15 mins time slot of month.

**Step 2:** The consumer may avail these banked units in the subsequent months by paying the difference between variable cost i.e. lowest variable cost of backdown power at the time of banking and highest variable cost of on-bar power at the time of utilization of units.

**Step 3:** The unutilized banked energy at the end of the financial year, limited to 10% of the actual total generation by such Renewable Energy generator in such financial year, shall be considered as deemed purchase by the Distribution Licensee at its lowest variable Power Purchase cost for that year and such power shall be eligible for REC/RPO:

The proposed draft changes in banking Regulations are annexed hereto as Annexure IV.

3.2 In view of above proposed amendments, the open access consumers sourcing power from infirm renewable sources can avail the banking facility without additional financial burden over MSEDCL which in turn will benefit the common consumers of MSEDCL.

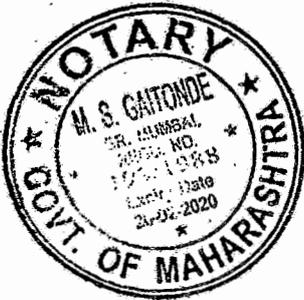


#### 4 PRAYERS

The Petitioner therefore, based on the submissions made in the foregoing paragraphs, most earnestly prays to the Hon'ble Commission:

- 4.1 To admit the Petition as per the provisions of the Regulations 36 and 37 of the MERC (Distribution Open Access) Regulations 2016;
- 4.2 To amend the Regulation 20 of MERC (Distribution Open Access) Regulations 2016 and also allow the sub-sequent amendments in Regulations by virtue of proposed Regulations.
- 4.3 To condone any error/omission and to give opportunity to rectify the same;
- 4.4 To permit the Petitioner to make further submissions, addition and alteration to this Petition as may be necessary from time to time.

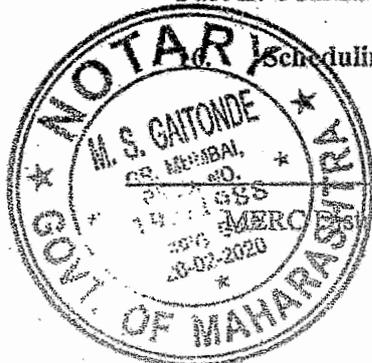
  
Chief Engineer (Commercial)  
MSEDCL



**MAHARASHTRA ELECTRICITY REGULATORY COMMISSION  
(DISTRIBUTION OPEN ACCESS) REGULATIONS, 2016**

**INDEX**

<b>Part A: PRELIMINARY</b>	<b>4</b>
1. Short Title, extent and commencement	4
2. Definitions	4
3. Eligibility to seek Open Access	10
4. Processing of Applications for Distribution Open Access and Connectivity	11
<b>Part B: CONNECTIVITY</b>	<b>13</b>
5. Grant of Connectivity	13
<b>Part C: GENERAL PROVISIONS FOR OPEN ACCESS</b>	<b>17</b>
6. Open Access Agreement	17
7. Categories of Open Access	18
8. Nodal Agency and Application Procedure	19
9. Procedure for Long Term Open Access in the Distribution System(s) within Maharashtra	23
10. Procedure for Medium Term Open Access in the Distribution System(s) within Maharashtra	25
11. Procedure for Short-term Open Access in the Distribution System(s) within Maharashtra	27
12. Consent by Distribution Licensee for STOA	31
13. Allotment Priority	32
<b>Part D: OPEN ACCESS CHARGES</b>	<b>33</b>
14. Billing	33
15. Compliance with State Grid Code	39
<b>Part E: SCHEDULING, METERING, REVISION AND LOSSES</b>	<b>39</b>
Scheduling	39



## 20. Banking of Renewable Energy generation

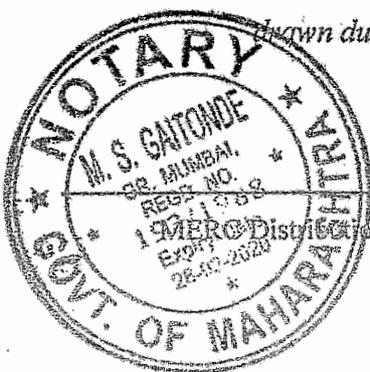
- 20.1. Regulation 19.3 shall not be applicable in case an Open Access Consumer obtains supply from a Renewable Energy Generating Station identified as 'non-firm power' by the Commission in its Regulations governing the Tariff for Renewable Energy.
- 20.2. The surplus energy from a 'non-firm' Renewable Energy Generating Station after set-off shall be banked with the Distribution Licensee.
- 20.3. The banking year shall be the financial year from April to March.
- 20.4. Banking of energy shall be permitted during all twelve months of the year:

Provided that the credit for banked energy shall not be permitted during the months of April, May, October and November, and the credit for energy banked in other months shall be as per the energy injected in the respective Time of Day ('TOD') slots determined by the Commission in its Orders determining the Tariffs of the Distribution Licensees;

Provided further that the energy banked during peak TOD slots may also be drawn during off-peak TOD slots, but the energy banked during off-peak TOD slots may not be drawn during peak TOD slots.

### Illustration: Energy banked during:

- Night off-peak TOD slot (2200 hrs – 0600 hrs) may only be drawn in the same TOD slot
  - Off-peak TOD slot (0600 hrs – 0900 hrs & 1200 hrs – 1800 hrs) may be drawn in the same TOD slot and also during Night off-peak TOD slot
- (However, the energy banked during night off peak and off peak shall not be drawn during morning peak and evening peak)



- *Morning peak TOD slot (0900 hrs – 1200 hrs) may be drawn in the same TOD slot and also during Off-peak and Night off-peak TOD slots*
- *Evening peak TOD slot (1800 hrs – 2200 hrs) may be drawn in the same TOD slot and also during Off-peak and Night off-peak TOD slots*

20.5. Banking charges shall be adjusted in kind @ 2% of the energy banked.

20.6. The unutilised banked energy at the end of the financial year, limited to 10% of the actual total generation by such Renewable Energy generator in such financial year, shall be considered as deemed purchase by the Distribution Licensee at its Pooled Cost of Power Purchase for that year:

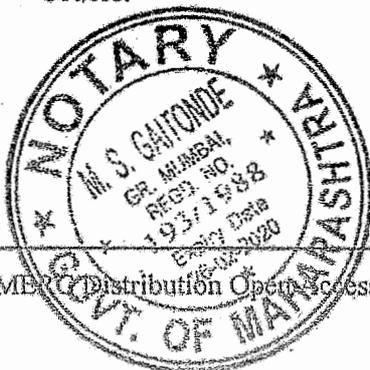
Provided that such deemed purchase shall not be counted towards the Renewable Purchase Obligation of the Distribution Licensee, and the Generating Station would be entitled to Renewable Energy Certificates to that extent.

## 21. Reactive Energy Charge

21.1. The methodology for payment for the reactive energy charges by an Open Access Consumer, Generating Station or Licensee with load of 5 MW or more shall be in accordance with the State Grid Code and the Regulations of the Commission governing Multi-Year Tariff or relevant orders of the Commission.

21.2. The reactive energy charges in respect of Open Access Consumers with load less than 5 MW shall be calculated on Power Factor basis as may be specified in relevant orders of the Commission.

21.3. The reactive energy charges in respect of Renewable Energy Generating Stations shall be in accordance with the charges approved by the Commission in its relevant Tariff Orders.







**Maharashtra State Electricity Distribution Co. Ltd.**

(A Govt. of Maharashtra Undertaking)

CIN : U40109MH20005SGC153645

PHONE No. 26474753 (P)/26474211 (O)

FAX No. 26472366

Email: [cecomm@mahadiscom.in](mailto:cecomm@mahadiscom.in)

Website: [www.mahadiscom.in](http://www.mahadiscom.in)

PLOT No. G-9, PRAKASHGAD

Prof. ANANT KANEKAR MARG

BANDRA (East)

MUMBAI-400051

No. Comm/Petition /Banking/

**2 3 0 0 2**

Date:

**20 SEP 2017**

To,

**The Secretary,**

Maharashtra Electricity Regulatory Commission,

Mumbai.

Sub: MSEDCL's additional submission in Case No. 85 of 2017.

Dear Sir,

Please find enclosed herewith the additional submission of MSEDCL in case no. 85 of 2017.

Thanking You,

Yours faithfully,

  
Chief Engineer (Commercial)

Copy S.w.r. to:-

- 1) The Executive Director, Dist. I/ (Commercial), MSEDCL, Mumbai.

Copy to:

- 1) Maharashtra Energy Development Agency, II Floor, MHADA Complex, Tridal Nagar, Pune-411006.
- 2) Prayas (Energy Group), Amrita Clinic, Athawale Corner, Deccan Gymkhana Karve Road, Pune 411 004.
- 3) Mumbai Grahak Panchayat, Grahak Bhavan, Behind Cooper Hospital, Vile Parle (West), Mumbai 400 056.
- 4) The General Secretary, Thane Belapur Industries Association, Robale Village, Post Ghansoli, Navi Mumbai 400 701.
- 5) Vidarbha Industries Association, 1<sup>st</sup> Floor, Udyog Bhavan, Civil Line, Nagpur 440 001.
- 6) Chamber of Marathwada Industries & Agriculture, Bajaj Bhavan, P-2, MIDC Industrial Area, Railway Station Road, Aurangabad – 431 057.
- 7) Maharashtra Chamber of Commerce, Industries & Agriculture, Oricon House, 6th Floor, 12 K, Dubash Marg, Fort, Mumbai – 400001.
- 8) Tata Power Company Limited, Bombay House, 24, Homi Mody Street, Fort, Mumbai 400 001.
- 9) Reliance Infrastructure Limited H-Block, 1st floor, Dhirubhai Ambani Knowledge City (DAKC), Navi Mumbai - 400 710
- 10) The Chief Engineer Regulatory, B E S & T Undertaking Best Bhavan, Best Marg, Post Box No 192, Colaba, Mumbai-400 001.

**BEFORE THE MAHARASHTRA ELECTRICITY REGULATORY  
COMMISSION, MUMBAI  
CASE NO. 85 OF 2017**

**IN THE MATTER OF:**

Petition for removal of difficulties in implementation of MERC  
(Distribution Open Access) Regulations, 2016, (Provision of Banking).

**AND**

**IN THE MATTER OF**

Maharashtra State Electricity Distribution Company Limited –

The Petitioner

***Affidavit***

I, Anil Wasudeo Mahajan, Aged 50 years, having my office at Maharashtra State Electricity Distribution Co. Ltd., Prakashgad, Plot No.G-9, Anant Kanekar Marg, Bandra (East), Mumbai-400 051 do solemnly affirm and say as follows :-

I am Superintending Engineer- II (Commercial) of Maharashtra State Electricity Distribution Co. Ltd., the respondent in the above matter and am duly authorized to make this affidavit.

The averments made in the enclosed additional Submission are based on the information received from the concerned officers of the Company and I believe them to be true.

I solemnly affirm at Mumbai on this ..... Day of September 17 that the contents of this affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there from.

**Superintending Engineer II (Commercial)  
BEFORE ME**

  
**RANJEET SINGH**  
M.Sc.LL.B.

**NOTARY**  
MAHARASHTRA  
GOVT. OF INDIA  
Register No. 6153  
Date: 20 SEP 2017

**NOTARY**  
RANJEET SINGH  
SANTACRUZ (E).  
MUMBAI, M.S.  
Regd. No. 9136  
Exp. Dt. 20/10/2021

**NOTARY**  
RANJEET SINGH  
SANTACRUZ (E).  
MUMBAI, M.S.  
Regd. No. 7436  
Exp. Dt. 20/10/2021

**NOTARY**  
RANJEET SINGH  
SANTACRUZ (E).  
MUMBAI, M.S.  
Regd. No. 9136  
Exp. Dt. 20/10/2021



**BEFORE THE HON'BLE MAHARASHTRA ELECTRICITY  
REGULATORY COMMISSION  
AT MUMBAI  
CASE NO. 85 OF 2017**

**IN THE MATTER OF**

Petition for removal of difficulties in implementation of MERC (Distribution Open Access) Regulations, 2016, (Provision of Banking).

**AND  
IN THE MATTER OF**

Regulation 20 of the MERC (Distribution Open Access) Regulations, 2016 (Provision of Banking)

**AND  
IN THE MATTER OF**

Maharashtra State Electricity Distribution Company Limited –

The Petitioner

**ADDITIONAL SUBMISSIONS**

On behalf of the Petitioner

(Maharashtra State Electricity Distribution Company Limited)

**MOST RESPECTFULLY SHOWETH:**

The present additional submission is being filed on behalf of the Petitioner (MSEDCL) pursuant to the directions issued by this



Hon'ble Commission vide daily order dated 27.07.2017. The Petitioner is filing the present additional submissions in addition to the Petition dated 23.05.2017.

1. It is to submit that, the following mechanism for banking of infirm Renewable power is being suggested by MSEDCL so that, there will not be adverse financial impact and it remains revenue neutral entity.
  - (i) The surplus banked units from the renewable sources in a month shall be treated as banked in terms of rupees currency at the lowest variable cost of backdown power for respective 15 mins time slot of month.
  - (ii) The consumer may avail these banked units in the same month by paying the difference between variable cost i.e. lowest variable cost of backdown power at the time of banking and highest variable cost of on-bar power at the time of utilization of units.

- (iii) The unutilized banked energy at the end of the month, limited to 10% of the actual total generation by such Renewable Energy generator in such month, shall be considered as deemed purchase by the Distribution Licensee at its lowest variable Power Purchase cost for that month and such power shall be eligible for RPO. Unutilized banked energy, in excess of 10% shall lapse.

2. MSEDCL's suggestions regarding present dispensations provided by Regulation to balance the equities.

- (i) It is most respectfully submitted that the following dispensation are provided in Regulation 20.4 so as to balance the equities.

*" Provided that the credit for banked energy shall not be permitted during the months of April, May, October and November, and the credit for energy banked in other months shall be as per*



*the energy injected in the respective Time of Day ('TOD') slots*

*Provided further that the energy banked during peak TOD slots may also be drawn during off-peak TOD slots, but the energy banked during off-peak TOD slots may not be drawn during peak TOD slots. "*

- (ii) It is to submit that, if the banking mechanism as proposed above is accepted, then the Provision 20.4 of Regulations may not be necessary and can be repealed. The infirm renewable energy may also be banked and drawn during the months of April, May, October and November. Also the energy banked in any 15 min time slot of the day (peak or off peak) may be drawn during any 15 min time slot of the day (peak or off peak) in terms of rupees currency as proposed in this Petition.

3. MSEDCL has proposed the above alternative mechanism for banking based on the study and financial implication which

have been observed in the recent past. Electricity being a dynamic and an ever-evolving subject poses a new and emerging challenge every day and needs for new mechanism to minimize the ambit of foul play and preserving equities of all the stakeholders needs to be arrived at.

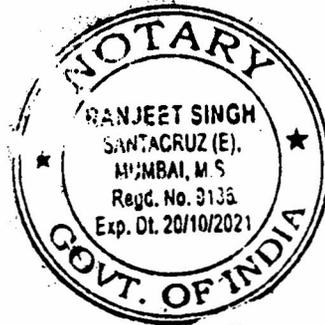
4. The Respondent craves leave of this Hon'ble Commission to file additional submissions/replies etc.

Date:

MSEDCL

Place: Mumbai

Respondent



*[Handwritten Signature]*  
20/9/17