

BEFORE THE HONOURABLE ANDHRA PRADESH ELECTRICITY  
REGULATORY COMMISSION

At its office at 4th Floor, Singareni Bhavan, Red Hills, Hyderabad-500 004

File No. /2020

O.P. Case No. 17 /2020

IN THE MATTER OF:

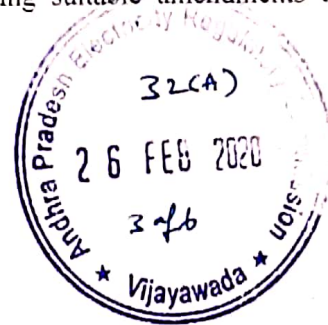
Seeking approval of the Honourable Commission to consider issuing suitable amendments to certain Clauses of the Regulation 2 of 2006.

AND

IN THE MATTER OF:

Eastern Power Distribution Company of A.P Limited (APEPDCL)

- Petitioner

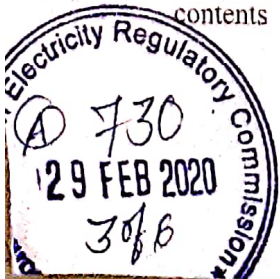


Affidavit

I, N.Gangadhar, Son of Sri N.Palla Rao, aged about 58 years, residing at Visakhapatnam, the deponent named above do hereby solemnly affirm and state on oath as under:-

1. That the deponent is the Chief General Manager, PPA & RA of Eastern Power Distribution Company of AP duly authorized by APEPDCL to make this affidavit on its behalf and the deponent is acquainted with the facts deposed below,

2. I, N.Gangadhar, the deponent named above do hereby verify that the contents of the affidavit and those of the accompanying petition are true to my personal




knowledge and verify that no part of this affidavit is false and nothing material has been concealed.


  
DEPONENT  
CHIEF GENERAL MANAGER  
PPA & RA  
A.P.E.P.D.C. LTD.  
VISAKHAPATNAM-13

**VERIFICATION:**

I, the above named Deponent solemnly affirm at Visakhapatnam on this 24<sup>th</sup> day of February, 2020 that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there from.

  
DEPONENT  
CHIEF GENERAL MANAGER  
PPA & RA  
A.P.E.P.D.C. LTD.  
VISAKHAPATNAM-13

Solemnly affirmed and signed before me.

  
Company Secretary  
**CORPORATE OFFICE**  
Eastern Power Distribution  
Company of A.P. Ltd.,  
VISAKHAPATNAM

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**IN THE MATTER OF:**

**Eastern Power Distribution Company of A.P Limited (APEPDCL)**

- Petitioner

**MOST RESPECTFULLY SHOWETH THE SUBMISSION**

**The APEPDCL humbly submits the following:**

1. The Govt of AP while reviewing the power sector performance having considered the deteriorated financial position of AP Discoms (Power Utilities) in the state, has decided to withdraw all the incentives that were given earlier in particular exemption of the transmission, wheeling charges and banking provision to the generators in respect of solar and wind plants vide GO.Ms.No.35 Dt.18.11.2019. Govt. vide letter Dt: 02.01,2020 clarify that banking of Variable Renewable Energy is withdrawn wholly i.e including yearly, monthly, daily , hourly as order in the GO.Ms.No.35 Dt.18.11.2019.
2. In view of the above, the licensee humbly requests the Hon'ble APERC to kindly consider to issue suitable orders/amendments to the following clauses of Regulation 2 of 2006.
  - (A) Seeking amendment to Second proviso of Clause 4.1 - SCHEDULING IN CASE OF Wind ,Solar and Mini Hydel Generators and Clause 10.5 - actual generation in each 15 minutes time block to be considered for OA energy settlement

in case of Wind, Solar and Mini Hydel instead of apportioned the monthly generation in each time block of the month.

- i. In terms of provisions of Section 42(2) of the Electricity Act, 2003, the Commission notified the APERC (Terms and Conditions of Open Access) Regulation, 2005 (No.2 of 2005), which came into force w.e.f. 01-07-2005. Clause 19.4 of that Regulation provides that the balancing and settlement of energy and demand shall be done in accordance with the Balancing and Settlement Code to be approved by the Commission. In this connection and in exercise of the powers conferred by Section 181 read with Sections 42(2), 66 and 94(2) of Electricity Act 2003(36 of 2003) and all other powers enabling it in that behalf, the Hon'ble APERC issued Regulation No.2 of 2006. In exercise of the powers conferred by the provisions of Electricity Act 2003, the Hon'ble commission issued amendment vide Regulation 1 of 2013 dt 02.05.2013 to the principal regulation 2 of 2006 which came into force w.e.f.02.05.2013, wherein Clauses 4.1 & 10.5 of the Regulation reads as follows:
- ii. Second proviso of Clause 4.1 of the regulation "Provided also that the Wind based, Solar based and Mini-hydel Open Access Generators shall not be required to provide a day-ahead wheeling schedule and the actual electricity injected by them shall be deemed to be the scheduled energy"
- iii. Sub clause 10.5 of the regulation "In case of Wind, Mini-Hydel and Solar OA generators the actual generation during the month shall be deemed as scheduled energy. For the purpose of settlement in respect of scheduled/OA consumer availing supply from these OA generators, the actual generation during the month will be apportioned for each time block of the month and deviations reckoned accordingly".
- iv. In this connection it is to submit that the Wind, Solar and mini hydel developers are gaining huge advantage over this clause as their average PLF of the year would be in the range of 20 – 30%, and at one stage it may generate 100% capacity and at some time it may be very low. Thus it varies frequently depending upon the climatic conditions.
- v. As per clause 10.5 of APERC regulation in case of Wind, Mini-Hydel and Solar OA generators the actual generation during the month are apportioned for each time block



- of the month in the open access settlements done at SLDC/EBC /APTRANSCO. Due to this when the generation from these plants is low the scheduled consumers are drawing power from the Discom in certain time blocks and they are under drawing at certain time blocks when generation is at peak.
- vi. Discoms are facing problem in forecasting the generation from these OA generators due to frequent switch over of the Open Access Scheduled Consumers from Generator to Discom Grid (when no Generation ) and these frequent switch over is affecting the power purchase cost.
- vii. To overcome the above discrepancies due to Wind, Solar and Mini hydel generators, APERC may make necessary amendment more in the direction to curtail the Grid disturbance and bring in Grid Discipline as per the Grid code the energy settlement of Wind, Solar and Mini hydel open access generators may be considered on par with conventional generators and other NCE generators based on scheduled energy and actual generation in each 15 minutes time block without apportion of the actual generation during the month for each time block.

**In the above circumstances, the licensee humbly prays the Honorable Commission:**

- i. To consider to issue amendment to second proviso of clause 4.1 and 10.5 of Regulation No. 2 of 2006 Wind, Solar and Mini hydel open access generators energy settlement on par with conventional generators and other NCE generators.
- ii. To pass such order as the Honourable Commission may deem fit and proper in the facts and circumstances explained above.

**EASTERN POWER DISTRIBUTION COMPANY OF ANDHRA PRADESH LIMITED**  
(APPLICANT)

Through

Place: Visakhapatnam  
Date : 24-02-2020

  
Chief General Manager  
PPA & RA :: APEPDCL  
CHIEF GENERAL MANAGER  
PPA & RA  
A.P.E.P.D.C. LTD.  
VISAKHAPATNAM-13