

WEST BENGAL ELECTRICITY REGULATORY COMMISSION

WEST BENGAL

Petition No. B-36/ABT/9

In the matter of

**Status report regarding installation of ABT meters and DC certification in respect
of all generating stations of CESC Limited**

And

In the matter of

**West Bengal State Electricity Transmission Company Limited
State Load Despatch Centre (W.B.)
P. O. Danesh Sk. Lane
Howrah 711 109.**

And

**CESC Limited
CESC House
Chowringhee Square
Kolkata.**

Representatives attended during hearing :

**State Load Despatch Centre, West Bengal State Electricity Transmission
Company Limited (WBSETCL)**

- 1. Sri Gautam Nayak, Chief Engineer, SLDC, WBSETCL**
- 2. Sri Sajal Krishna Bag, Addl. Chief Engineer, SLDC, WBSETCL**

CESC Limited (CESC)

- 1. Smt. Gargi Chatterjea, Executive Director, CESC**
- 2. Sri Sanjoy Mukherjee, Executive Director (DT), CESC**
- 3. Sri Indranil Chatterjee, Vice President, CESC,**
- 4. Sri Arunava Sen Gupta, General Manager (System Operations), CESC**

CASE IN BRIEF

- 1.0 In terms of advisory of the Commission issued by a letter under memo No. WBERC/B-36/ABT/8/4425 dated 02.08.2019, WBSLDC requested CESC to install ABT meters in respect of all outgoing feeders of each internal generating station, viz. Budge Budge, Southern and Titagarh for calculation of generation and was also requested for certification of the declared capacity of their embedded generations after demonstration as per regulation 6.4 and 6.7 of the West Bengal Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2011 (in short "Tariff Regulations 2011") of the Commission. WBSLDC also requested CESC to indicate the timeline of completion of meter installation work so that the declared capacity certification of the internal generations of CESC can be started in accordance with regulatory guidelines.
- 2.0 CESC Limited vide letter dated 09.09.2020 confirmed that procurement process is in progress and installation and commissioning of ABT meters for Budge Budge and Southern generating stations will be completed by March 2021. CESC also informed that ABT metering of Titagarh generating station would be taken up appropriately at a subsequent date as they are not scheduling power from Titagarh generating station at present.
- 3.0 On 23.03.2022, CESC shared the meter details when WBSLDC found that the meters were not installed as per the regulatory guidelines as the same were installed at the Generating Transformer (GT) and Station Transformer (ST) instead of 'all outgoing feeders including bus sectionalizer or the tie line between two stages of generating stations having different tariffs or different ownership or both' as specified under regulation 7(1), Table 1.1 of the Central Electricity Authority (Installation and Operation of Meters) Regulations, 2006.
- 4.0 Further, in terms of regulation 3(i) of the Balancing & Settlement Code Regulations, 2021 of the Commission, which, inter-alia states that 'the embedded generating stations would be under obligation to demonstrate their

respective declared capacities', in order to validate the result of any such demonstration and to establish the Plant Availability Factor of Budge Budge and Southern generating stations, data from ABT compliant boundary meters are required. CESC is also required to certify the availability of internal generations as per regulations 6.4, 6.7 and 6.11 of the Tariff Regulations 2011.

- 5.0 In order to resolve the issue of installation of ABT meters and Declared Capacity certification in respect of embedded generating stations of CESC, an e-hearing was held on 14th June, 2022 at 14.30 hours when the representatives from both WBSLDC and CESC were present.

SUBMISSION DURING HEARING

- 6.0 Both the parties were heard and from the submission of CESC it revealed that the existing metering system at the embedded generating stations of CESC is in compliant with the provisions of Balancing and Settlement Code Regulations, 2021. The dispute is confined to the contention of WBSLDC regarding applicability of CEA (Installation and Operation of Meters) Regulations, 2006 for embedded generator in the existing context. It also revealed from CESC that whatever else is required to be done as per the provisions of the Tariff Regulations, 2011 and Balancing & Settlement Code Regulations, 2021 as well as the direction given by the Commission in the Tariff Order dated 03.02.2022 in respect of CESC for the years 2018 – 2019 and 2019 – 2020, same will be done with prospective effect.

- 7.0 Upon hearing both CESC and WBSLDC, the Commission directs that –

- a) WBSLDC shall submit to the Commission the updated status report on installation of ABT meters and DC certification in respect of all embedded generating stations of CESC Limited in the form of Affidavit within 10 days from the date of receipt of this order, with a copy to CESC;
- b) CESC shall submit their written submission to the Commission in the form of Affidavit within 10 days from the date of receipt of this order with a copy to WBSLDC;

- c) WBSLDC shall submit their comments, if any, to the Commission on the written submission of CESC, in the form of Affidavit within 5 days from the date of receipt of written submission from CESC, with a copy to CESC.

8.0 CESC submitted their written submission though sworn in affidavit on 23.06.2022. in its affidavit dated 23.06. 2022 CESC inter-alia submitted the followings:

- a. On-line monitoring display arrangement of generation and sent-out figures as well as dedicated voice communication from CESC Control room and WBSLDC Control room are in place since 2009. The on-line SCADA data records are also available since 01.04.2014 with CESC.
- b. Availability Schedule and Injection Schedule on day-ahead basis is being provided regularly by CESC to SLDC in prescribed format of SLDC since 2009. Revision of Schedules on real time are also sent by CESC to SLDC. Initial Schedules are being uploaded on CESC website since 01.04.2014 and Provisional Final Schedules for CESC, published by SLDC, are also being uploaded on CESC's website.
- c. CESC claimed that, demonstration of Declared Capacity was possible for the embedded generating stations of CESC, as requisite metering arrangement, online communication, scheduling practices and data recording facilities were in place since 2009. It is also submitted that, historically, CESC was never asked to demonstrate its declared capacity.
- d. Regarding installation of ABT meter as asked for by SLDC, CESC has submitted that the embedded generating stations are not under ABT mechanism and do not require to have ABT compliant meters and non ABT compliant Energy accounting and audit meters are sufficient. The installation of ABT meters is neither required in accordance with the regulations nor necessary to comply with the Commission's Regulations and order. CESC reiterated that, authentication of demonstrated declared capacity is possible through SCADA and erstwhile metering arrangement.

9.0 SLDC has submitted status report and also comments on written submission of submission of CESC through sworn in affidavit on 29.06.2022. SLDC also submitted additional submission and 20.07.2022. SLDC inter-alia submitted the followings:

- a) In its submission SLDC agreed that, dedicated voice communication, online monitoring system are in place and schedules were also submitted by CESC. However, SLDC alleged that, despite their request for installing ABT meter for demonstration of declared capacity, CESC has not earlier disclosed that demonstration required under Tariff Regulations, 2011 is possible through their existing non-ABT meters, rather CESC communicated that installation of ABT meters are in process. SLDC referred to its letters dated 02.08.2019 and subsequence responses of CESC vide letters dated 10.12.2019 and 23.12.2022.
- b) SLDC further submitted that, meanwhile ABT complaint meters are installed at i.r.o. GT and ST in BBGS and SGS. SLDC has requested CESC for demonstration of actual declared availability of SGS from 00:30 hrs. to 01:00 hrs. (Block 3 & 4) on 19.07.2022 and also demonstration of actual declared availability of BBGS from 03:00 hrs. o 03:30 hrs. (Block 13 & 14) on 19.07.2022. Based on the raw meter data from ABT complaint meters demonstration of actual declared availability of both SGS and BBGS were found successful.
- c) SLDC submitted that, they have carried out a comparative analysis and found that non-ABT meter data are matching with the ABT meters. However, there are issues of collection and transmission of non-ABT meter data and CESC has to bring their data server at SLDC and submitted non-ABT meter data in excel format (.xls file) for comparison.

Observation of the Commission.

10.0 The Commission observes that, objective of demonstration under regulation 6.7 of the Tariff Regulations is to ensure the correctness of the claimed

availability (Declared Capacity) by the generating station so that interest on end consumers are protected. The embedded generating stations of the licensee are not exposed to commercial treatment for frequency linked variations, except for governor operations. Thus, the basic purpose of demonstration of these plants is to determine the availability for recovery of their capacity charge.

- 11.0 It is also observed that though dedicated communication and on-line monitoring system is in place but the dispute is in connection with requirement of ABT meter or non-ABT meter. From the arguments put forth by the parties, it is evident that demonstration could have been possible with the existing non-ABT meters. However, neither SLDC has directed the licensee nor the licensee has expressed the capacity of their existing meters to fulfil the requirements of demonstration, when asked for by SLDC. It is also observed that, while comparing the ABT vs non-ABT readings, data transportation from non-ABT was not possible and CESC brought their data server at SLDC and provides the data in .xls format. The Commission notes that, it is the responsibility of the licensee to transport the meter data to SLDC in proper non-tampered format. It is also observed that, actually regarding claimed by CESC, that they were never asked for demonstration by SLDC, no specific reply was made by SLDC. This is a serious lapse on the part of SLDC.
- 12.0 In view of above, the Commission finds that, considering the principle of natural justice, availability submitted by CESC needs to be considered in absence of specific direction for demonstration. However, now onwards SLDC shall ask CESC to demonstrate their availability in terms of regulation 6.7 of the Tariff Regulations, 2011 and CESC shall facilitate the communications as well as actual data to SLDC required for analyzing the demonstration.
- 13.0 Commission also observed that in terms of regulation 6.1.1 of the Tariff Regulations 2011 the recovery of capacity charges based on availability shall be applicable for thermal generating stations hydro generating stations of above 25 MW of licensees who satisfy the conditions specified in the regulation 6.4.2 and will be guided by regulation 6.4.2.

- 14.0 In terms of regulation 6.4.2 of the Tariff Regulations 2011 recovery of capacity charges for all the generating stations of the licensees shall be against the normative availability for which the schedule of availability for all the 15 minutes time block shall be provided to the SLDC directly by the ALDC in respect of a licensee's generating stations for recording and subsequent demonstration of their declared capacity as mentioned in regulation 6.7 of these regulations and for this purpose the licensees shall also make on-line monitoring display arrangement of generation/sent-out of the generating stations along with dedicated voice communication at SLDC to meet the need of regulation 6.7 of Tariff Regulations, 2011 and also paragraph 2 and 5 of Schedule- 10 of Tariff Regulations, 2011 for incentives.

Order

- 15.0 CESC shall continue with declaring their scheduled availability to SLDC for their thermal generating stations as specified in the regulation 6.4.2 of the Tariff Regulations, 2011.
- 16.0 SLDC shall ask CESC to demonstrate their availability in terms of Regulations for certification purpose.
- 17.0 This order has general application since the order is passed following relevant Regulations and has strict binding effect.
- 18.0 Let a copy of this order be served to WBSEDCL, CESC Limited, IPCL and WBSLDC.
- 19.0 Let a copy of the order be uploaded in the website of the Commission.

**Sd/-
(PULAK KUMAR TEWARI)
MEMBER**

**Sd/-
(SUTIRTHA BHATTACHARYA)
CHAIRPERSON**

DATE: 30.07.2022

**Sd/-
SECRETARY**