



MAHATRANSCO
Maharashtra State Electricity Transmission Co. Ltd.
CIN: U40109MH2005SGC153646

MAHARASHTRA STATE ELECTRICITY TRANSMISSION CO. LTD.
MSETCL/CO/STU-R&C/ **No - 8691** Date: **E7 DEC 2022**

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To,
As per enclosed list.

Sub: Submission of Distribution Open Access Monitoring and Review Committee Report 2021-2022

Ref: Distribution Open access Monitoring and review committee meeting held on 16th Dec 2021 and 15th February 2022

Dear Sirs,

With reference to above subject, as per the directives of the Hon'ble Commission in its Distribution Open Access Regulation, 2016, committee is constituted by CE (STU) and so far two meetings have been conducted under the chairmanship of Chief Engineer, MSETCL (STU) for FY 2021-2022, on implementation of the regulation or any related aspect pertaining to open access.


The report is based on the observations and suggestions submitted, deliberations in the meetings (dated 16th December 2021 and 15th February 2022) conducted under the chairmanship of Chief Engineer, (STU), & submissions made as per MoM by MSETCL/STU, SLDC and Distribution Licensees i.e. MSEDCL, BEST, TPC-D, BEST & Central Railway.

In view of above, the report is finalized and the detailed report with the Committee's Observations/Suggestions are enclosed herewith.

Thanking you.

Encl: As above.

Yours Faithfully,


(Sanjeev G. Bhole)
Chief Engineer (STU)

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**Distribution Open Access
Monitoring and Review
Committee Report
2021-2022**


FOREWORD

As per the directives of the Hon'ble Commission in its Distribution Open Access Regulation, 2016 dated: 30th March 2016, a committee is formed and so far two meetings have been conducted under the chairmanship of Chief Engineer, MSETCL (STU), on implementation of the regulation or any related aspect pertaining to open access.

The report is based on the observations and suggestions submitted, deliberations in the meetings (dated: 16th December 2021 and 15th February 2022) conducted under the chairmanship of Chief Engineer, (STU), & submissions made as per MoM by MSETCL/STU, SLDC and Distribution Licensees i.e. MSEDCL, BEST, TPC-D, BEST & Central Railway.

Based on the above, the report is finalized and the detailed report with the Committee's Observations/Suggestions are enclosed herewith.

We thank all the Committee members for their co-operation, contribution and those who have assisted in the completion of the report.


Shri. S. G. Bhole
Chief Engineer, (STU)

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Chapter -1

Background

As per the directive given by Hon'ble Commission in MERC (Distribution Open Access) Regulations 2016 at para 31.1, a Committee is to be constituted under STU.

Para 31.1 of above Regulation specify that STU has to constitute an Open Access Monitoring and Review Committee. The relevant regulation is reproduced for reference:

“ **31.1.** *The STU shall constitute and be the Convener of an Open Access Monitoring and Review Committee comprising one member each of MSLDC, STU, the Distribution Licensees, a person nominated by the Commission from among its officers and a Consumer Representative nominated by the Commission, which shall monitor the progress of Open Access and shall meet at least once in 3 months*”

As per the Hon'ble Commission DOA-2016 Regulation the structure of Committee is as given below.

- | | |
|---------------------------------------|----------|
| 1) Chief Engineer, STU, | Convener |
| 2) Chief Engineer SLDC, | Member |
| 3) Representative of MSEDCL, | Member |
| 4) Representative of BEST, | Member |
| 5) Representative of AEML-D, | Member |
| 6) Representative of (TPC-D) | Member |
| 7) Representative of Central Railways | Member |
| 8) Person nominated by the Commission | Member |

Chapter -2

Proceedings of the 1st Meeting

1st Distribution Open Access Monitoring & Review Committee meeting was held through VC on 16.12.2021 and the following issues were discussed among all Committee members.

Agenda Point 1

Non-Intimation of scheduling demand to Distribution Licensee by consumers.

Discussion:

Representatives of TPC-D and AEML-D, members of the Committee raised the issue that some consumers of the Partial Open access do not intimate the revision/change in scheduling of their demand to the Distribution Licensee. Real time deviation in drawl and injection is not intimated by consumer to the Distribution Licensee. MERC representative suggested to give a primary intimation to the consumers about above issue and provisions of the Regulations in this respect

Conclusion:

It is concluded that, Distribution Licensees is directed to prepare/submit the list of consumers who do not intimate the scheduling of demand. Consumer should be pursued to submit the revision in their demand of Partial Open Access to the concerned Distribution Licensee.

Agenda Point 2

Provision of common platform/website for processing of application for Open Access

Discussion:

AEML (D) Representative opined that there should be common platform/website for application for Open Access, as presently for MTOA, applications are required to submit hard copy for processing. Also common IT platform will result in timely approval & ease in tracking of approval status & timelines

Conclusion:

AEML (D) & MSEDCL shall share outline indicating schematic for implementation of common platform/website for application for Open Access. This will be deliberated in next meeting for inputs from all stakeholders

Agenda Point 3

Revision in DSM Bills due to delay in credit notes, development of mechanism for timely completion of energy accounting

Discussion:

At present credit notes for infirm open access is being received throughout every month, which results into revision of bills of open access consumer and delay in credit of open access to the concerned consumers by the Distribution Licensee. Further, it may also result into multiple revision in the DSM bills. M/s TPC(D) suggested that an online facility may be developed for issuance of credit notes and necessary data may be fed into the online portal by the concerned agency i.e. distribution licensee, open access generator, MSLDC etc in order to avoid any communication delay in issuance of credit note. It is also pertinent to mention that after implementation of DSM in the state of Maharashtra, it has become necessity to issue credit notes for the energy generated from these infirm sources before issuance of DSM bill by MSLDC, as energy generated from these infirm generating sources are also part of energy accounting under DSM mechanism. Therefore, suitable mechanism / protocol may be developed under the guidance of MSLDC for timely completion of energy accounting to avoid any delay in energy accounting and multiple revision in the DSM bills as well as bill issued by distribution licensee to open access consumers who are availing open access from infirm sources.

Conclusion:

The above point was discussed and it was decided that final decision will be taken in next meeting.

Agenda Point 4

Nomination of an expert as consumer representative

Discussion:

As per Regulation para 31.1, Committee may nominate an expert as Representative from a registered industrial association or Consumer Representative as it may deem fit.

Conclusion:

It is concluded that, a committee may nominate an expert as Representative, depending upon Agenda Points of the meeting.

Agenda Point 5

Receipt of MTOA applications directly from consumers instead of Distribution Licensees

Discussion:

STU is in receipt of MTOA applications from various partial Open Access consumers of MSEDCL. As per Distribution Open Access Regulations, 2016 distribution licensee is the nodal agency to grant MTOA for partial OA. As such the MTOA applications should be received from Distribution Licensees to STU and not from Consumers directly.

Conclusion:

MSEDCL is requested to look into such applications & hence forth the applications received from Partial Open Access consumer needs to be forwarded by MSEDCL to STU.

Agenda Point 6

Monitoring of the progress of the OA

Discussion

Monitoring of the progress of the OA is one of the mandates for the Committee as per the Distribution Open Access Regulations. A format to monitor the progress of Open Access is prepared and attached herewith, which needs to be filled in by the Distribution Licensees/ SLDC. Hence, in every meeting the progress report of OA shall be one of the agenda and needs to be discussed.

Conclusion:

STU to collect the information from the Distribution Licensees and circulate the Agenda and schedule of next meeting well in advance.

Chapter – 3

Proceedings of the 2nd Meeting

2nd Distribution Open Access Monitoring & Review Committee meeting was held through VC on 15.02.2022 and the following issues were discussed among all Committee members.

MERC Agenda:

Agenda Point-1:

Provision of common platform/website for processing of application for Open Access

Discussion:

Common platform/website for application of Open Access. At present, MTOA applicants are required to submit hard copy of applications for processing of their request of Partial Open Access. Relevant inputs are required from all stakeholders

Conclusion:

STU will initiate the proposal for development of software.

Agenda Point -2:

Revision in DSM Bills due to delay in credit notes, development of mechanism for timely completion of energy accounting

Discussion:

At present, Credit notes for infirm open access are being received throughout every month, which results into revision of bills of open access consumer and delay in credit of open access to the concerned consumers by the Distribution Licensee.

Suitable mechanism / protocol development under the guidance of MSLDC for timely completion of energy accounting to avoid any delay in energy accounting and multiple revision in the DSM bills as well as bill issued by distribution licensee to open access consumers who are availing open access from infirm sources.

- Adani and Tata is stated that for actual credit of energy, a generator or consumer submits the credit note to respective distribution licensee and based on that SLDC issues bills. Presently SLDC issues bills based on scheduled data due to unavailability of GCN (Generator Credit Note) data. Currently it takes 2 to 10 months for DSM (Deviation Settlement Mechanism) settlement for MSLDC. Due to this MSLDC needs to revise the bills as per credit notes.
- MSEDCL also agreed with the above issue. MSLDC stated that energy should be accounted monthly on basis of 15 Min. time block through ABT meters. MSEDCL

representative will discuss the issue with their respective section and this will be deliberated in next meeting.

Conclusion

The said Agenda will be deliberated in next upcoming meeting.

Agenda Point -3:

Bill & payment of Additional Transmission Charges to be levied on TSU for their Additional use of Power more than base TCR/CC as per MERC Final order in case of 52 of 2020.

Discussion:

STU stated that MSEDCL has outstanding ATC bills for Nov-20 to May -21, July -21, Oct-21. MSEDCL was asked to pay their outstanding ATC bills. However MSEDCL representatives confirmed that they will discuss with the concerned officials and inform to STU . MERC discussed whether the ATC bills can be issued along with the regular MTC bill raised by STU. STU informed that ATC billing along with the regular MTC billing is lagging 2 months back. This gap can be reduced to one month depending upon the availability of data from SLDC. AEML-D pointed out that the ATC are billed comparing Base TCR and 15 Min time block Peak demand which needs to be reviewed. MERC asked for detail abstract with statistical figures from AEML-D and directed AEML-D to submit the write-up for all the points/queries of AEML-D along with solution.

AEML-D pointed that COC data used by STU for ATC billing is not as per the DSM data or the COC schedule data submitted to SLDC. The COC data used for ATC needs to be same as used on DSM. Further SLDC should provide all the necessary data for ATC billing to STU.

AEML-D informed that COC data is scheduled data and TSUs again submit the revise actual COC data to SLDC after 2 months. Hence accordingly the ATC bills also needs to be revised by STU based on actual COC data submitted by SLDC.

Conclusion:

MSLDC to submit the COC data from April-20 onwards to STU for ATC billing

Agenda Point -4:

Due Verification of Documents of STOA application as per MERC DOA Regulation by the Distribution Licensees before forwarding to MSLDC for concurrence.

Discussion: All utilities are requested to submit the applications before due date with due verification.

Agenda Point -5

Monitoring of the progress of the OA

Discussion:

Status of Submission of information of open access data from Distribution Licensees in the format circulated with MOM of 1st Distribution Open Access meeting held on 16.12.2021.

Conclusion: All distribution licensees have to submit the data by 01.04.2022 (enclosed herewith Annexure A).

Chapter - 4

Committee's Observations & Suggestions:

- *Non-Intimation of scheduling demand to Distribution Licensee by POA consumers.*

Observations:

It is observed that some consumers of the Partial Open access do not intimate the revision/change in scheduling of their demand to the Distribution Licensee. Real time deviation in drawl and injection is not intimated by consumer to the Distribution Licensee.

Suggestions

Primary intimation to be given to Partial Open Access consumers about scheduling of their demand also Distribution Licensees needs to prepare/submit the list of Partial Open Access consumers who do not intimate the scheduling of demand to the committee. The same is not yet received by committee. Distribution Licensee should pursue Partial Open Access consumers to submit the revision in their demand of Partial Open Access.

- *Provision of common platform/website for processing of NOC application for MTOA/LTOA Open Access*

Observations:

The Distribution Licensee discussed that currently the application for Open Access is physically submitted to various utilities and there is no common platform for processing of Open access application. AEML-D suggested that the process should be done through a digital platform and no physical movement of documents be necessary for processing the same.

The committee decided to develop a common IT platform which will result in timely approval & ease in tracking of approval status & timelines

Suggestions

MERC suggested STU to develop a common IT platform for the same and other distribution licensees like M/s AEML-D and M/s TPC-D will coordinate with STU for development of software.

STU has conducted meeting regarding development of common website for application of Open Access with IT professionals of M/s Adani ltd & M/s Tata Power Ltd. along with MSETCL's IT professional on 19.04.2022 & 16.06.2022 respectively. The process of development of Software is under process by STU.

Revision in DSM Bills due to delay in credit notes, development of mechanism for timely completion of energy accounting

Discussion:

Presently SLDC issues bills based on scheduled data due to unavailability of GCN (Generator Credit Note) data. Currently it takes 2 to 10 months for DSM (Deviation Settlement Mechanism) settlement for MSLDC. Due to this MSLDC needs to revise the bills as per credit notes.

Suggestions:

M/s TPC(D) suggested that an online facility to be developed for issuance of credit notes and necessary data may be fed into the online portal by the concerned agency i.e. distribution licensee, open access generator, MSLDC etc in order to avoid any communication delay in issuance of credit note. It was suggested that, a suitable mechanism / protocol to be developed by MSLDC for timely completion of energy accounting to avoid any delay in energy accounting and multiple revision in the DSM bills as well as bill issued by distribution licensee to open access consumers who are availing open access from infirm sources. The mechanism from MSLDC is not yet received to the committee. MSLDC suggested that energy should be accounted monthly on basis of 15 Min. time block through ABT meters.

Receipt of MTOA applications directly from consumers instead of Distribution Licensees

Discussion:

STU is in receipt of application for issuance of NOC for grant of partial medium term open access MTOA applications from various partial Open Access consumers of MSEDCL.

In this regard, it is to mention that, as per Distribution Open access Regulation 2016, Clause No (8.4), for Medium Term Open Access, at Sr.No 7,

“if the injection point is Intra-State Transmission System and drawal point is any distribution System within Maharashtra, the Distribution Licensee on whose Distribution system the consumer is connected is the Nodal Agency for granting MTOA”

Also, as per clause (10.4),

“on receipt of the Application for Open Access, the Nodal agency shall obtain all the permissions and clearances from Distribution Licensee, MSLDC, STU and other agencies as may be required for open access transaction.”

Therefore as per Distribution Open access regulation 2016, concerned distribution licensee is the Nodal agency and is responsible for processing of MTOA applications and forward the

documents to STU for issuance of NOC. Further the billing in respect of Partial Open Access consumer is done by concerned Distribution Licensee, as all data of consumer is with Distribution Licensees. At present, EHV consumers of MSEDCL submit their applications for MTOA directly to STU for issuance of NOC.

Suggestions:

STU suggested MSEDCL to inform the concerned consumers to submit their applications for MTOA through their office only for issuance of NOC. The same practice is being adopted by all other distribution licensees. The same has been intimated to MSEDCL Vide L. No 5739 dt 02.08.2022.

Bill & payment of Additional Transmission Charges to be levied on TSU for their Additional use of Power more than base TCR/CC as per MERC order in case of 52 of 2020.

Discussion:

STU stated that MSEDCL has outstanding ATC bills for Nov-20 to May -21, July -21, Oct-21. MSEDCL was requested to pay their outstanding ATC bills. However MSEDCL representatives confirmed that they will discuss the same with the concerned officials and accordingly inform to STU. MERC asked whether the ATC bills can be issued along with the regular MTC bill raised by STU. STU informed that ATC billing along with the regular MTC billing is lagging 2 months behind. This gap can be reduced to one month depending upon the availability of data from SLDC. AEML-D pointed out that the ATC are billed comparing Base TCR and 15 Min time block Peak demand which needs to be reviewed. MERC asked for detail abstract with statistical figures from AEML-D and directed AEML-D to submit the write-up for all the points/queries of AEML-D along with solution. The same is not yet submitted by AEML-D

AEML-D pointed that COC data used by STU for ATC billing is not as per the DSM data or the COC schedule data submitted to SLDC. The COC data used for ATC needs to be same as used on DSM. Further SLDC should provide all the necessary data for ATC billing to STU.

AEML-D informed that COC data is scheduled data and TSUs again submit the revise actual COC data to SLDC after 2 months. Hence accordingly the ATC bills also needs to be revised by STU based on actual COC data submitted by SLDC.

Suggestion

MSEDCL suggested that they will be ready to pay the ATC from Nov-21 onwards as MSLDC has implemented DSM from Nov-21 onwards.

On the observation of AEML-D, MERC asked M/s AEML-D to submit write-up within 8 days with Regulatory Provisions & Points to take decision. AEML-D has not yet submitted the same to the committee. Further MERC directed SE, MSLDC to submit the COC data from April-20 onwards to STU. However, in spite of the directives of MERC MSLDC is still forwarding the COC schedule data as submitted to them by TPC-D. Therefore ATC billing is done by STU based on the COC schedule data submitted by TPC-D to MSLDC.

Monitoring of the progress of the OA**Discussion:**

Status of Submission of information of open access data from Distribution Licensees in the format was circulated with MOM of 1st Distribution Open Access meeting held on 16.12.2021. However, we have not received any data from any distribution licensee

Suggestion:

STU and MERC has requested all distribution licensees to submit the data as per format.


Chief Engineer, (STU)