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MSETCL/CO/STU-R&C/

No - 6307

Date:

14 JUL 2025

To,

As per enclosed list.

Sub: Submission of Distribution Open Access Monitoring and Review Committee Report for 2025

Ref: Distribution Open access Monitoring and review committee meeting (6th meeting dated 08.05.2024, 7th meeting dated 08.08.2024 and 14.08.2024, 8th meeting dated 29.01.2025, 10.02.2025, and 20.02.2025.)

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 three meetings have been conducted under the chairmanship of Chief Engineer, MSETCL (STU) for 2023, 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 (6th meeting dated 08.05.2024, 7th meeting dated 08.08.2024 and 14.08.2024, 8th meeting dated 29.01.2025, 10.02.2025, and 20.02.2025) conducted by the committee and 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

(Prakash Sharma)
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Distribution Open Access Monitoring and Review Committee Report 2025

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 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 6th meeting dated 08th May 2024, 7th meeting dated 8th August 2024 (Part-I) and 14th August 2024 (Part-II), 8th meeting dated 29th Jan 2025 (Part-I), 10th February 2025 (Part-II) & 20th February 2025 (Part-III) conducted under the chairmanship of Chief Engineer, (STU), & submissions made as per MoM by MSETCL/STU, MSLDC and Distribution Licensees i.e. MSEDCL, TPC-D & AEML-D

Based on the above, the report is finalized and the detailed report with the Committee's conclusion/recommendations 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. Peeyush Sharma
Chief Engineer, (STU)

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Chapter -1

Background

As per the directives 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 Regulations the structure of Committee is as given below:

1) Chief Engineer, STU	Convener
2) Chief Engineer MSLDC	Member
3) Representative of MSSEDCL	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

Agenda Point 1 :

Difficulties in processing of Green Energy Open Access (GEOA) applications through National GOAR portal and MSLDC's existing STOA software.

Discussion: The following issue was discussed in 6th and 7th Distribution Open Access Monitoring & Review Committee meeting.

- (i) MSLDC had prepared the draft procedure for processing of GEOA for STOA in line with DOA Second Amendment Regulation 2023. This draft procedure is discussed with utilities and same has been published on MSLDC's website for stakeholder's comments on 30.04.2024. After finalization of the procedure, the same will be uploaded on website.
- (ii) MSLDC is working on development of the software and integration with National GOAR portal, till the development of software, MSLDC will forward the applications to Distribution Licensees for their consent via email and all Distribution Licensees are requested to provide the consent via email within stipulated timelines as mentioned in GOAR procedure.
- (iii) STU informed that they will prepare the draft procedure for grant of MTOA/LTOA in line with NLDC procedure and the same will be shared with all utilities for their comments/suggestions, if any. In the meantime, all applications for MTOA/LTOA will be processed through GOAR portal only for Renewable power and Open Access portal (STU) for Non-Renewable power.
- (iv) Further, in next meeting it was informed that MSEDCL is not receiving any applications on GOAR portal as no login is provided for MSEDCL in GOAR portal. Thus, MSEDCL is facing issues for billing process.
- (v) In the 7th part-II meeting held on 14.08.2024, MSEDCL stated that, due to problems facing by OA consumers of Distribution Licensees while Processing/registering the OA application in GOAR portal developed by NLDC, it is necessary to follow the earlier procedure for processing OA application till the integration of STU/SLDC software with GOAR portal and further requested that, OA consumer will have to apply simultaneously on the STU/Discom portal for LTOA/MTOA in case of nodal agency is STU and on MSLDC/Discom for STOA in case of nodal agency is SLDC. The submission of OA application on Discom portal is for billing purposes only.
- (vi) MSLDC stated that NLDC and MSLDC are working on integration of STU/MSLDC software with GOAR Portal till then, the applications to be processed with existing

procedure and it is necessary to prepare interim procedure for processing of OA applications. MSLDC will prepare interim procedure for STOA applications.

- (vii) OA consumers having PPA with Renewable/Non-Renewable generator can apply to OA portal developed by STU for availing LTOA/MTOA. STU agreed with SLDC for preparation of interim procedure for processing of OA application.

Conclusion:

- (i) The Committee had recommended that the procedure for GOAR prepared by NLDC shall be followed by GEOA consumers/ stakeholder.
- (ii) It was concluded that, till the development of software integration work of STU/MSLDC software with GOAR portal, OA consumers having PPA with Renewable/Non-Renewable generator can apply to OA portal developed by STU available on Mahatransco website for availing LTOA/MTOA and for availing STOA, consumers can apply to MSLDC existing OA Portal.
- (iii) MSLDC will prepare interim procedure for grant of STOA and STU will prepare interim procedure for LTOA/MTOA.

Accordingly, STU had published interim procedure for the processing of Medium/Long term green energy open access considering Procedure for Grant of Green Energy Open Access published by Grid controller of India and MERC (DOA & TOA) Regulations 2016 and their amendments on 01.10.2024 and MSLDC has prepared interim procedure for grant of STOA and the same is submitted to Hon'ble Commission for approval.

Chapter -3

Agenda Point 2:

Issuance of GCN/ certification for power injected into Grid by the Distribution Licensee particularly for EHV connected Open Access consumers.

Discussion: The following issue was discussed in 6th, 7th and 8th Distribution Open Access Monitoring & Review Committee meeting.

- (i) Representatives for AEML-D stated that currently OA credit processing for Intra-state Transactions is undertaken with delay of 2 - 6 months as GCN's are delayed. AEML-D requested MSEDCL to provide GCN within time and requested to expedite the credit processing.
- (ii) MSEDCL stated that in the case generators having connectivity EHV, MSEDCL will not issue GCN. In response to this, MSLDC stated that as per existing procedure and Govt guidelines as per annexure "G" of Hon'ble Maharashtra Ministry of Power circular No. "“शासन निर्णय क्रमांक: अपाऊ-2020/प्र.क्र.137 (अ)/ऊर्जा-7” " dated 11.05.2022 wherein MSEDCL/Developer has been entrusted the responsibility of issuance the Generator Credit Note (GCN). In view of this, host distribution licensee (generator located under respective discom's area) shall issue the credit note to the generator irrespective of its connectivity. In case developer is issuing the GCN then respective host distribution licensee should certify that GCN.

For discussion of above point, consumer representatives of Distribution Licensees, members were called in the 8th Distribution Open Access Monitoring & Review Committee meeting (Part II) held on 10.02.2025.

Discussion:

- (i) MSEDCL comments: At present, Open Access consumers apply directly on MSEDCL portal for grant of Partial LTOA/MTOA applications. However, after Go Live of NSDL GOAR portal, MSEDCL is not receiving any applications on their portal as no login is provided for MSEDCL in GOAR portal. Hence, MSEDCL is facing issues for billing process. In GOAR portal, the requisite information of the applicant needs to be sent on e-mail to distribution licensee and distribution licensee needs to provide 'Discom consent' to STU/MSLDC via email. It will become very difficult to process numerous applications through mail and difficulty in billing process due to non- integration of softwares.
- (ii) MSLDC stated that the activities for development of new Short Term Green Energy Open Access portal is at initial stage and MSLDC is working on development of software and integration with National GOAR portal. Till then the application to be processed as per

existing procedure. For the same interim procedure for short term green energy open access applications will be prepared by MSLDC. And for the long term and medium term, STU will be prepare interim procedure.

- (iii) There was long discussion regarding various issue related to GOAR portal, However the major issue discussed was about issuing of credit notes.
- (iv) Issuing credit notes is MSEDCL's internal process. MSEDCL issues credit notes where generator is in MSEDCL area and consumer is in other Licensee area. On the application of Licensee And / OR MSLDC, MSEDCL issues consent for such generator. On the basis of consent, credit note is issued. MSLDC vide E-mail dated 30.05.2024 clarified that the generators which are connected to EHV do not require consent of MSEDCL. Hence, it will not be proper to issue credit note to the generators which are connected on EHV. The reference of GoM letter dated 11.05.2022 given by MSLDC says that, Monthly Generation Credit Note to be issued by Developer / MSEDCL. As such, MSEDCL may issue credit notes for the generator which are connected to MSEDCL distribution network and Developers shall provide the monthly generation data for the generators which are connected to EHV."
- (v) MSLDC highlighted the Annexure "G" of Hon'ble Maharashtra Ministry of Power Circular No. "शासन निर्णय क्रमांक: अपाऊ-2020/प्र.क्र.137 (अ)/ऊर्जा-7" dated 11.05.2022 wherein MSEDCL has been entrusted the responsibility of issuance the Generator Credit Note (GCN). In view of this, MSLDC reiterated that host distribution licensee(generator located under respective discom's area) shall issue the credit note to the generator irrespective of voltage level.
- (vi) It was concluded that MSLDC to prepare a Standard Operating Procedure (SOP) for certifying the Energy Injection Report for Renewable Generators in Maharashtra. MSLDC prepared and forwarded the draft procedure for comments/suggestions of Distribution Licensee(s) of the State on dated 18.10.2024.
- (vii) The matter was further discussed in 8th DOA meeting on 29.01.2025. MSEDCL stated that, as per MERC Approved RE F&S Procedure(2nd Amendment) dated 15.01.2025, Regulation 5.6, the QCA shall be appointed by the Generators for the purposes specified in these Regulations.
- (viii) After long discussion, MSLDC opined that the data can be collected from respective QCAs and if developer can provide the same data to other Distribution licensees as MSEDCL then other Distribution licensees may follow the same and the same may be decided by respective Distribution licensees.

- (ix) Further in 8th DOA meeting (Part-II) held on 10.02.2025, TPC-D and AEML-D proposed that they prefer credit notes over QCA as it will be a challenge for the Distribution Licensee to deal with so many QCAs on monthly basis. Till the establishment of specific procedures and the operationalization of the QCA's contract wise data submission as mandated under Regulation 11.4, the prevailing practice for providing Open Access credit by MSEDCL may continue as an interim measure.
- (x) MSEDCL's representative explained their current methodology and mechanism for billing such that, for HV level, developer along with MSEDCL officials according to individual breakup of generator turbine and percentage sharing enters feeder meter data into MSEDCL system at circle level.
- (xi) MSEDCL suggested that to implement the same in other Distribution licensees, MSEDCL will share the Raw file with respective Distribution licensees to avoid deviation in generation units and open access units. However data will be self -certified by each Distribution licensee.
- (xii) MSEDCL will also share the percentage sharing of data as per distribution licensees for 33kV connected generators.
- (xiii) MSEDCL suggested that QCA has data for EHV level connected generators and QCA may provide the data to other Distribution licensees as well.
- (xiv) MSEDCL suggested that other Distribution licensees may visit MSEDCL's office and they may help out other Distribution licensees to resolve and discuss other issues on data conversion, and meter data sharing.

As per the discussion and conclusion in earlier meeting held on 10.02.2025, a meeting was conducted on 14.02.2025 at Prakashgad, Bandra between MSEDCL, AEML-D, TPC-D for discussing the issues on providing meter data of generators & other data modalities.

As per the Meeting held on 14.02.2025, it was decided to invite QCAs in next meeting which was scheduled on 20.02.2025 for further discussion. Accordingly QCA's were invited for meeting held on 20.02.2025 through VC.

Discussion with QCAs:

8th DOA meeting Part-III was held on 20.02.2025

1. Responsibilities of QCA:

As per the Regulation RE F&S Regulation, QCAs to provide 15 Minutes contract/ transaction wise , meter data of generators connected to HV & EHV level S/s to MSLDC, Distribution licensees till MSLDC web based system is made live.

2. Details for Meter Reading :

MSEDCL and other Distribution licensees will share the list of contracts and all the contract information, generator data and PSS information to QCAs for Joint meter Reading whose data is required for billing purposes.

3. Joint Meter reading by QCA & Distribution licensees and data sharing:

- The meter data will be taken by QCA in presence of MSEDCL representative who will also guide and assist QCAs for meter reading. The sealed installed meters are unsealed by MSEDCL officials for downloading of meter data and again sealed by MSEDCL officials.
- The seal for EHV level meters will be unsealed by STU/MSETCL officials.
- The data will be shared in encrypted format (or Excel if Possible) by QCA. Since the MSEDCL official is available, the data will be shared with MSEDCL, however QCA needs to share the respective data to other respective distribution licensees.
- QCA will collect the meter data and submit the data in raw & excel format to Distribution licensees with name of PSS, information of contract and details as required by Distribution licensees.

4. Percentage allocation :

In case generator is in contract with multiple Distribution licensees, the generator and QCA to communicate with each other and QCA will submit contract wise generation data to Distribution licensee as per percentage allocation . A procedure to be made for percentage allocation by QCA and Distribution licensees.

5. Data Format:

Each Distribution licensees and QCAs should have Software for conversion of raw file into Excel format. QCA/MSEDCL will provide the details of the software required for distribution licensees to convert raw meter reading data into Excel format. QCAs shall submit data in Excel format (15 Minutes Data & Summary Data) along with the raw data to the Distribution licensees & Generator so as to audit and verify it. Format for sharing the data to be fixed. This shall include PSS name, Generation capacity connected to PSS, Type of RE (Solar/Wind), Commissioning date of RE plant, Voltage level at which PSS is connected to grid, Multiplying factor of meters, consumer number wise capacity of RE power availed by consumers of TPC-D/AEML-D through that PSS. Once the QCA gives contract-wise breakup, Distribution licensees should give the commercial settlement/ Energy adjustment to the respective beneficiaries/consumers of the generators whom QCAs are representing. QCA to share the make of meters and meter data conversion software's to TPC-D/AEML-D to enable them for conversion of raw data into usable form. Support to be extended by MSEDCL till receipt of meter data conversion software. , In case of any revision in the data shared earlier, QCA should share the revised details to all the Discoms with CC to MSLDC, STU through one common mail.

6. **Conclusion:**

1. **For Generators of other distribution Licensees at EHV Level:** QCA will provide all pending meter data from August 2024 onwards to other distribution licensees. MSETCL staff will seal & unseal the interface meters while assisting the meter reading and collecting data along with QCA.
2. **For Generators of other distribution Licensees at HV Level:** MSEDCL will provide GCN for month of February and March 2025. The interim procedure will be implemented from 1st April 2025 onwards where QCA will provide meter data to other distribution licensees for HV level as well. MSEDCL staff will seal & unseal the meters while assist the meter reading and collecting data along with QCA.
3. Further, it was decided that AEML-D and TPC-D will develop the software for conversion of raw formats to excel formats by 1st April 2025. The Contact details (Email ID and mobile number) of each QCA to be shared with Distribution Licensee.

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Chapter -4

Miscellaneous issues

Agenda Point 3 :

Uploading consents/NOC's on MSLDC's STOA software.

Discussion: The above issue was discussed in 6th Distribution Open Access Monitoring & Review Committee meeting was held through VC on 08.05.2025. Presently there is no provision for MSEDCL login to view and verify the documents in the system. MSEDCL requested the login permission in the system so as to verify the documents in MSLDC's STOA software.

Conclusion:

The committee recommends that MSLDC and MSEDCL to coordinate with each other and allow MSEDCL to view and verify documents in the system.

Agenda Point 4:

Clarity on Relinquishment Charges for termination of LTOA/MTOA by partial OA Consumers and Collection of relinquishment charges

Discussion:

The above issue was discussed in 6th Distribution Open Access Monitoring & Review Committee meeting dated 08.05.2024. The regulatory provisions are clear on the issue & all stakeholders should follow the same. MSEDCL stated that there is no such Clause for recovery of relinquishment charges of 30 days before cancellation of MTOA in DOA Regulation, 2016 and DOA First Amendment) Regulation, 2019. STU informed that, the consumer granting Open access from MSEDCL follows MERC (Distribution Open Access) Regulation, 2016, however since they are using STU network for their Open access, MERC (Transmission Open Access) Regulation 2016 is also applicable to them and thus Clause 27.2 of MERC (Transmission Open Access) Regulation 2016 is applicable to the consumer. Further also notified that notice is a part of procedure and relinquishment charges are the penalty for terminating the Open access before time.

Conclusion:

In order to seek further clarification on the issue the concerned stakeholder may approach Hon. MERC. The issue may be considered for amendment to the DOAR 2016.

Agenda Point 5:

Procedure for cancellation of MTOA and LTOA:

Discussion:

The above issue was discussed in 6th Distribution Open Access Monitoring & Review Committee meeting dated 08.05.2024. MSEDCL stated that there are frequent cancellations of MTOA and LTOA permission by the applicant. There is no clarity for minimum cancellation period of MTOA/ LTOA. MSEDCL suggested that the minimum cancellation period for MTOA & LTOA

should be 5 /7 years.’ As per definition, consumer should avail transmission rights minimum seven years of LTOA and three months for MTOA. After that consumer can relinquish their capacity rights partly or fully as per Regulation 27.1 and 27.2 of Maharashtra Electricity Regulatory Commission (Transmission Open Access 2016. Hence OA Applicant should avail minimum period of MTOA/LTOA of OA rights.

Conclusion:

The Committee recommends Hon. MERC to bring more clarity on the same during subsequent amendments. .

Agenda Point 6:

Providing login to view scheduling of RE generators:-

Discussion

The above issue was discussed in 6th Distribution Open Access Monitoring & Review Committee meeting dated 08.05.2024. MSLDC informed that they have shared the login credential to all Distribution licensees viz MSEDCL (Chief Engineer - RE), TPC-D, AEML-D, BEST, Railways, etc. in June-2019 itself. The same have been re-shared to nodal officer of MSEDCL’s RE section on 27.10.2023. Through said login, buyers can see the PSS-wise schedules submitted by QCA.

Conclusion:

Buyers should access the REMC web portal provided by MSLDC to see PSS-wise schedules. Also, buyers should access the web portal of State Scheduling software to see consolidated RE schedules.

Agenda Point 7:

Application (Non –Renewable/Non-EHV consumers) to be forwarded by distribution Licensee for issuance of NOC from STU for grant of partial LTOA/ MTOA as per clause 9.6 and 10.4 of DOA Regulations, 2016.

Discussion:

The above issue was discussed in 6th Distribution Open Access Monitoring & Review Committee meeting dated 08.05.2024. STU has developed Open Access portal and made live from 03.05.2024. STU requested all Distribution Licensees/ consumer to apply Open access application through online portal only and all distribution licensees to give consent within time. MSEDCL requested to provide timeline for application for MTOA/LTOA application to apply.

Conclusion:

The Committee directed MSEDCL to inform STU before cancelling MTOA/LTOA henceforth. MSEDCL assured that it will inform STU before cancelling MTOA/LTOA henceforth.

Agenda Point 8:

MSEDCL is not remitting the collected transmission charges from POA consumers as per clause 14.5 of Distribution Open Access Regulations, 2016.

Discussion:

The above issue was discussed in 6th Distribution Open Access Monitoring & Review Committee meeting dated 08.05.2024. STU requested MSEDCL to remit the transmission charges collected from Partial Open Access consumers as specified under regulation. It was also stated that the issue of delay payment charges to the distribution licensee also arises due to non-remittance of transmission charges within seven days.

Conclusion:

The Committee asked MSEDCL to follow the regulation in the matter and expedite the payment of POA charges as per the provisions of the Regulations.

Agenda Point 9:

Insufficient amount of LC in respect of MSEDCL & M/s AEML-D- action for non-compliance of MERC Regulations thereof.

Discussion:

The above issue was discussed in 6th Distribution Open Access Monitoring & Review Committee meeting dated 08.05.2024. The regulation provides for opening of LC by TSU, however there is no provision for opening of insufficient amount of LC by TSU. MERC in Case No.162 of 2016 directed to open ESCROW account instead of LC. However, MSEDCL and AEML-D has neither opened ESCROW account nor has submitted sufficient amount of LC as per aforesaid regulation.

Conclusion:

The Committee recommended that the utilities needs to follow the Regulations/ Orders of the Commission in this regard and further actions to be taken for such scenarios may be mandated through upcoming MYT regulations. STU has further taken up the matter in MYT Tariff for InSTS from FY 2025-26 to 2029-30. STU may approach the Commission for non-compliance of the Regulations

Agenda Point 10:

Clarification is sought regarding the determination of transmission charges concerning whether they apply to the input metered units or the actual energy consumption at the consumer's end (Input MU or the actual energy drawl at the consumption end) in open access scenarios. Consequently, there's a need to ascertain the transmission charges payable by the Distribution Licensee.

Discussion:

The above issue was discussed in 6th Distribution Open Access Monitoring & Review Committee meeting dated 08.05.2024

- The purpose of wheeling charges, the Wheeling charges are meant to include charges for use of the utility's physical infrastructure for wheeling and the administrative expenses involved and not for loss.

- MSEDCL is levying wheeling charges on actual consumption to the consumers who receive supply of electricity from the distribution licensee of his area of supply. If wheeling charges are levied at consumption end to consumer who receive supply of electricity from the person other than the distribution licensee of his area of supply then, it seems open access consumers are utilizing the licensee network without paying any charges which is an undue benefit to the open access consumers.
- Hence either Distribution licensees should be levied charges on actual energy Consumption or Open access consumer shall be charged on Input energy which is their actual consumption as the buyer of electricity shall bear the approved wheeling losses of the Distribution System.
- TPC-D suggested that transmission charges should be applied at same periphery.

Conclusion:

The regulatory provisions are clear on the issue & all stake holders should follow the same. The Commission has issued the various Orders on this issue based on the Hon'ble ATE Judgment. The matter was closed.

Agenda Point 11:

Open Access Consumer schedule on MSLDC scheduling software.

Discussion & conclusion:

The above issue was discussed in 6th Distribution Open Access Monitoring & Review Committee meeting dated 08.05.2024. TPC D requested to give final Open schedules on MSLDC website. MSLDC informed that whatever is the latest updated on website be taken as final schedule. Schedules of Non-RE OA transactions are available in MSLDC scheduling software login (and not on MSLDC Website).

Agenda Point 12:

Treatment of Transmission Charges paid for supply of power to AEML SEEPZ Limited (ASL) from various wind generators and refund/adjust the excess transmission charges thereof.

Discussion:

The above issue was discussed in 7th Distribution Open Access Monitoring & Review Committee meeting (Part I) dated 08.08.2024

AEML stated that ASL has procured power from Wind & Solar generators through Traders MPL & AEL for the period from Jan-24 onwards. STOA was booked & Transmission charges on total capacity was billed by MSLDC and the same is also paid to MSLDC. As per the methodology defined in 4th Distribution Open Access Monitoring & Review Committee meeting (in case of EON), refund of transmission charges is requested by MPL to MSLDC based on actual GCN received for the period from Jan-24 to May-24. However MSLDC has not yet refunded transmission charges amounting to Rs. 4.8 Cr.

ASL requested that the refund of transmission charges as per the methodology approved in 4th Distribution Open Access Monitoring & Review Committee meeting should be followed wherein refund to be provided within 15 days of submission of actual generation data (GCN).

MSLDC stated that the transmission charges were levied based on the approved open access quantum for the entire period, as per the Transmission Open Access Regulations (TOAR), 2016. Now, M/s Manikaran Power Ltd. (MPL) has raised the objection of the calculation of transmission charges. The same issue was raised by M/s EON Kharadi for allocation of transmission charges on actual basis. During the 4th DOA review committee meeting held on 27.04.2023, the matter was discussed in detail, and it was concluded that the calculation of Transmission Charges for power sourced from renewable energy (RE) generators should be based on actual data using the Generation Credit Note (GCN).

However, after verification of the actual demand of ASL and deviation bills issued, it is observed that most of its demand is met through Inter Discom Transfer (IDT) with AEML-D. The transmission charges for these inter discom Transfer (IDT) were not levied by MSLDC. Thus, MSLDC proposes to levy the Transmission Charges for purchase of power from Inter Discom Transfer.

Also, for some periods it is observed that ASL has fulfilled its demand through deviation. As per TOA Regulation 2016, clause 14.5 any TSU availing open access is liable to pay additional regulatory charge at a rate of twenty-five percent of Transmission charges for excess in TCR.

Thus MSLDC also proposes to levy Transmission charges and additional regulatory charges to ASL for the period from start of its operation until allocation of Based TCR to ASL as well as inclusion in the MYT order as long term TSU by MERC. The Transmission charges will be levied on actual basis computed for only RE (Solar and Wind).

The summary of the Transmission charges and additional regulatory charges to be levied will be as below:

ASL	FIRM Power (INTRA+INTER)	RE Power (SOLAR+WIND)	Inter Discom Transfer (IDT)	Deviation
Transmission Charges	Yes (Procured Basis)	Yes (Actual Basis)	Yes (Procured Basis)	Yes
Additional Regulatory Charges	No	No	No	Yes (Twenty Five Percent of Trans. Charges)

Further, MSLDC proposes to submit this methodology for any new upcoming Deemed Distribution Licensee notified by MERC which are not sharing the Transmission charges on monthly basis as per MYT order.

MSLDC further stated ASL is connected directly to 33kv feeder, therefore they should pay the charges. MSLDC suggested that, the refund should be done to trader immediately and the billing through IDT charges is to be done. With respect to charges on overdrawn, deviation charges are also transmission charges.

AEML stated that AEML SEEPZ Ltd. (ASL) is a deemed Distribution Licensee & its commercial operation started from 01.11.2023. Hence BPCR was not determined or approved by Commission & same will be approved from upcoming MYT control period i.e FY 25-26 onwards.

In view of above Additional Regulatory charges cannot be billed to ASL as BPCR is not determined / Approved for ASL

MSLDC also clarified that Additional Regulatory charges is not applicable and only Short Term Transmission charges will be applicable on the Overdraw energy.

Accordingly Short Term Transmission charges will be applicable as below,

ASL	Firm Power (Intra + Inter)	Re Power (Solar + Wind)	Inter Discom Transfer (IDT)	Deviation
Transmission Charges	Yes (Procured Basis)	Yes (Actual Basis)	Yes (Procured Basis)	Yes (Over Draw Energy)

AEML further requested that the GCN refund should be done earliest.

Conclusion:

MSLDC to levy the transmission charges as per below methodology:

AEL SEEPZ LTD	Firm Power (Intra + Inter)	RE Power (Solar + Wind)	Inter Discom Transfer (IDT)	Deviation (Overdraw Quantum)
Transmission Charges	Yes (Procured Basis)	Yes (Actual Basis on the basis of GCN)	Yes (Procured Basis)	Yes (As per DSM Bills)

Accordingly, the transmission charges will be refunded to M/s MPL. Also, Transmission charges on IDT power purchased and Deviation (Overdraw energy) will be billed separately to M/s AEML SEEPZ LTD. MSLDC to do the transmission charges refund based on Generator Credit Note issued by MSEDCL to generator at the earliest. The same methodology will be adopted for the new deemed distribution licensees (DDL) until the inclusion in MYT order.

Agenda Point 13:

Discussion on letter of M/s Ambad Industries & Manufacturers association (AIMA) forwarded by Hon'ble MERC requesting amendments in certain clauses of MERC DOA and TOA Regulations, 2016 and its amendment as per following table.:

Sl. No.	Document Name	Clause	Description
1	Maharashtra Electricity Commission (Distribution Open Access) (Second Amendment) Regulations, 2023)	Clause 3.3	Regarding uniformity of quantity in open access
2		Clause 20.4	Banking Charge
3		Clause 20.5	Banking Energy for carry forward if not utilised in same month.
4	Maharashtra Electricity Regulatory Commission (Transmission Open Access) (First Amendment) Regulations, 2019	Clause 14.1	Applicability of Transmission Charges in ST/MT/LT Open Access.
5	Maharashtra Electricity Regulatory Commission (Transmission Open Access) Regulation 2016	Clause 11.1	Short Term Open Access Application (Timeline)

Discussion & conclusion:

The above issue was discussed in 7th Distribution Open Access Monitoring & Review Committee meeting (Part I) dated 08.08.2024. AIMA representative was not present in the meeting. The Points suggested by AIMA were discussed.

Since all the points submitted by M/s AIMA has no proper justification and the clauses are as per the rules and have already gone through regulatory process. Thus no further discussion was carried out.

Agenda Point 14:

Submission of additional GNA requirement as per Clause 19.2 of the CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022 for next 3 (three) financial years.

Discussion & conclusion:

The above issue was discussed in 7th Distribution Open Access Monitoring & Review Committee meeting (Part I) dated 08.08.2024. STU requested all the distribution licensees to submit additional GNA requirement as per Clause 19.2 of the CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022 for next 3 (three) financial years by 31st August 2024.

Agenda Point 15:

Submission of OA permission details to MSLDC:

Discussion & conclusion:

The above issue was discussed in 7th Distribution Open Access Monitoring & Review Committee meeting (Part I) dated 08.08.2024. MSLDC informed that MERC has notified (Forecasting, Scheduling and Deviation Settlement of Solar and Wind Generation) (First Amendment) Regulations, 2024. Trial mode will be initiated from 4th October 2024.

As such it is requested to submit Open Access permission issued by distribution licensees timely and correctly before 27th of every month to avoid delay in scheduling and energy settlement issues.

MSLDC informed that they have invited comments/ suggestions on draft procedure for implementation of Forecasting, Scheduling and Deviation Settlement of Solar and Wind Generation) (First Amendment) Regulations, 2024 by stakeholders by 21st August 2024.

Agenda No.16

Implementation of Hon'ble APTEL Judgement dated 05th July 2024 in Appeal No.95 of 2024.

Discussion:

The above issue was discussed in 7th Distribution Open Access Monitoring & Review Committee meeting (Part II) dated 14.08.2024. STU stated that, Hon'ble APTEL vide its order dated 05th July 2024 in Appeal No.95 of 2024 has set aside the Hon'ble MERC order dated 07th November 2023 in Case no.95 of 2023.

The relevant ruling of Hon'ble APTEL order is as follows:

"22. In view of the aforesaid observations and findings, we, feel it appropriate to set aside the impugned Order to the extent of calculation of Base TCR for the Appellant and remind the matter to Respondent No.7, MERC directing it to calculate the base TCR afresh for Control period under consideration in the light of the observations recorded in the foregoing paragraphs."

All stakeholders discussed the issue of availability of data of POA consumers as some of the consumers are embedded consumers in other distribution licensee's area and meter data of identified interface locations with Distribution Licensee is only available in DSM Module and separate meter data of POA consumers is not available in DSM Billing Module.

AEML-D and TPC-D have expressed their difficulties in providing 15 minutes demand data of POA consumers as OA generators of their consumers are located in MSEDCL's area and those are embedded generators. Hence, they cannot provide the required data to SLDC for exclusion of POA demand from their CPD and NCPD demand. MSEDCL stated that they have a 15 minute time block demand data of their consumers, and same will be provided to SLDC for further calculations.

Conclusion:

STU recalculated the average demand of POA Consumers for FY 2020-21 to FY 2023-24 based on the data provided by MSEDCL. Further STU has submitted the True-up for InSTS Tariff for FY 2022-23 and FY 2023-24 in the current petition of MYT Tariff for InSTS from FY 2025-26 to 2029-30.

Agenda No. 17:

There are about 1900 generators with different units in different PSS in the State. In accordance with the provisions of the MERC RE F&S Procedure dated 15.01.2025, MSLDC is collecting details of PPA & Open Access data from all the Distribution licensees & STU for scheduling activities. This activity is carried out on monthly basis. It is observed that some of the utilities are providing the open access information for the RE generators which are not commissioned. There are total 1300 No. of such transactions under STOA scheduled for the month of January-2025. Considering large quantum of RE transactions, it is not possible to verify each time to confirm whether generator is commissioned or not before enabling scheduling activities. This may lead to erroneous scheduling of such non-commissioned capacity. Further, if such generator is not commissioned, then, there will erroneous billing at Distribution licensee's side as well.

Discussion:

The above issue was discussed in 8th Distribution Open Access Monitoring & Review Committee meeting (Part I) dated 29.01.2025. AEML stated that Open access is not granted if generator is not commissioned. However, sometimes generator assures that they will commission within time before start of Open access.

Conclusion:

MSLDC requested to not submit such data. Further, recommended that in case a generator is commissioned after 27th of that month, Distribution licensees may submit the data for that particular generator later separately.

Agenda No. 18:

There is delay in giving consent by MSEDCL to OA consumer in case of LTOA/MTOA applications. MSLDC prepares a Common Registry having all the commercial details of each Wind & Solar Generator in the State. Further, as per the MERC RE F&S Procedure dated 19.12.2019 and its amendment dated 15.01.2025, all the Distribution licensees and STU are mandated to submit RE contract details to MSLDC by 27th day of each month by updating Common Registry for scheduling. Due to delay in receiving consent there is delay in granting open access to the consumers. Further, the consumers are requesting STU to grant open access for Backdated period.

Discussion:

The above issue was discussed in 8th Distribution Open Access Monitoring & Review Committee meeting (Part I) dated 29.01.2025. STU requested MSEDCL to submit the consent on time. If delayed open access is granted by MSEDCL & STU, MSLDC may reject the applications.

Conclusion:

MERC and STU recommended to take action time in bound manner.



Chief Engineer, (STU)



**MAHARASHTRA STATE ELECTRICITY TRANSMISSION CO.
LTD.**

CIN: U40109MH2005SGC153646

Office of the Chief Engineer (STU)

Address: 'Prakashganga', MSETCL, Plot no. C-19, E-Block, BKC,
Bandra (E), Mumbai-400051

Website: www.mahatransco.in

Email Id: cestu@mahatransco.in

Contact no: (O) 022-2659 5176

MSETCL/CO/STU-R&C/

1-4094

Date: **128 JUN 2024**

To,
The Secretary,
Maharashtra Electricity Regulatory Commission,
13th floor, Centre No.1, World Trade Centre,
Cuffe parade Colaba,
Mumbai- 400005

Sub: Minutes of 6th Distribution Open Access Monitoring & Review Committee meeting held on 08.05.2024.

Ref: (i) MSETCL/CO/STU-R&C/ 05510 dtd 20.09.2021.

(ii) 6th Distribution Open Access Monitoring & Review Committee meeting held on dated 08.05.2024.

Dear Sirs,

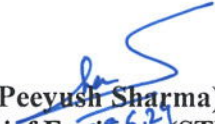
With reference to the above subject, as per the directives of Hon'ble Commission in MERC (Distribution Open Access) First amendment Regulations 2019, a Committee is constituted vide letter under reference (i). Accordingly, 6th meeting was held on 08.05.2024 through VC. The same was attended by the representative of the Distribution Licensees, MSLDC and Hon'ble MERC.

Minutes of 6th Distribution Open Access Monitoring & Review Committee meeting is enclosed herewith.

Thanking you.

Encl: As above

Yours Faithfully,


(Peeyush Sharma)
Chief Engineer (STU)

Sub: Minutes of 6th Distribution Open Access Monitoring & Review Committee meeting held on 08.05.2024.

To,

- 1) The Director (Electrical Engineering),
MERC, 13th Floor, Centre No.1, World Trade Centre, Cuffe Parade,
Colaba, Mumbai-400 005.
Email id: prafulla.varhade@merc.gov.in
- 1) The Deputy Director (Technical),
MERC, 13th Floor, Centre No.1, World Trade Centre, Cuffe Parade,
Colaba, Mumbai-400 005.
Email id: popat.khandare@merc.gov.in
- 2) The Chief Engineer,
Maharashtra State Load Dispatch Centre,
Kalwa, Thane-Belapur Road, Airoli Navi- Mumbai-400 708.
Email id: ceslde@mahatransco.in
- 3) The Chief Engineer(Commercial),
Maharashtra State Electricity Distribution Co. Ltd,
5th floor Prakashgad, Plot No.G-19, Anant Kanekar Marg,
Bandra (East), Mumbai-400 051.
Email id: cecomm@mahadiscom.in , cecommho@mahadiscom.in
- 4) Assistant Vice President,
Adani Electricity Mumbai Ltd (Distribution Business),
CTS 407/A, (New), 408 (old) village,
7th floor, Eksar Devi Das lane,
Off SVP road, Borivali (west), Mumbai 400 103.
Email id: abaji.naralkar@adani.com
- 5) Group head Regulatory,
M/s. Tata Power Co. Ltd,
Backbay receiving Station, 148, Lt. Gen. J. Bhonsale Marg,
Nariman Point, Mumbai-400021.
Email id: hawwa@tatapower.com
- 6) The Deputy Chief Engineer (Power),
BEST,
1st Floor Multistoried Annexe Building, BEST Marg,
Colaba, Mumbai-400 001.
Email id: derc@bestundertaking.com
- 7) The Chief Electrical Distribution Engineer,
Central Railway,
Electrical Branch, 2nd floor, Parcel office Building, CST, Mumbai-400 001.
Email id: dyceetrdcrly@gmail.com

Sub: Minutes of 6th Distribution Open Access Monitoring & Review Committee meeting held on 08.05.2024.

Minutes of meeting of 6th Distribution Open Access Monitoring & Review Committee held on dt. 08.05.2024 through VC.

Following members have attended the meeting:

Members	Designation and Organization
Shri. Peeyush Sharma	CE, STU
Shri. Pravin Y. Ganvir	Deputy Director (Tech), MERC
Smt Sharda Takpere	SE, STU-R&C
Shri Laxman Pirwani	SE(I/C), Commercial, MSEDCL
Shri. Girish Pantoji	SE(Operations), MSLDC
Shri. Sunil Bhinge	Deputy CE, BEST
Smt Hawaa Inamdar	Lead Regulatory WR - Compliances ,TPC-D
Shri. Vinay Singh	EE, Commercial, MSEDCL
Shri Ranjeet Savardekar	Assistant Vice President, ABT Cell, AEML-D
Shri. Nishant Godha	General Manager , ABT Cell, AEML-D

STU welcomed all the Open Access Monitoring Committee Members. Central Railway representative was not present in the VC meeting.

Agenda No. 1 : Uploading consents/NOC's on MSLDC's STOA software.

(1) Committee Discussion:

- (i) MSLDC Representatives stated as per the procedure of Grid Controller of India Ltd (NLDC) for grant of Green Energy Open Access (GEOA), the consent of Distribution Licensee is required.
- (ii) MSLDC Representatives further stated that the consents /NOCs on MSLDCs software are not being uploaded by MSEDCL as per provision instead are emailed.
- (iii) MSEDCL Representatives requested the login permission in the system so as to verify the documents in the system.
- (iv) Presently there is no provision for MSEDCL login to view and verify the documents in the system.

(2) Regulatory provision:

- (i) Regulation 11.2 of MERC (Distribution Open Access) (Second Amendment) Regulations, 2023 (DOA second Amendment Regulations 2023)

“11.2

.....

(e) *On receipt of the Application for Open Access, the Nodal Agency shall obtain all the permissions and clearances from the Distribution Licensees, MSLDC, STU and other agencies, as may be required, for the Open Access transaction.”*

(3) Committee Observation and Recommendation:

The committee recommends that MSLDC and MSEDCL to coordinate with each other and allow MSEDCL to view and verify documents in the system.

Compliance-related to this issue to be discussed at the next meeting.

Agenda No. 2: Processing of Green Energy Open Access (GEOA) applications.

(1) Committee Discussion:

- (i) Representative of MSLDC stated that NLDC has prepared procedure for processing of GEOA applications.
- (ii) Further for more clarity to GEOA applicants and stakeholders, MSLDC has prepared the draft procedure for processing of GEOA for STOA in line with DOA Second Amendment Regulation 2023. This draft procedure is discussed with utilities and same has been published on MSLDC's website for stakeholder's comments. After finalization of the procedure, the same will be uploaded on website.
- (iii) MSLDC is in process of development of software and till the development of this software, MSLDC will forward the applications to Distribution Licensees for their consent via email and all Distribution Licensees are requested to provide the consent via email within stipulated timelines as mentioned in GOAR procedure.
- (iv) Also, NLDC has not provided any login for Distribution Licensees in the GOAR portal to incorporate the same in the portal.
- (v) MSEDCL Representatives suggested that the GEOA applicants shall simultaneously apply on respective Distribution Licensee's online application portal along with processing fee and as per time period mentioned in DOA and TOA Regulations 2016 and DOA First Amendment Regulations 2019. As per procedure notified by NLDC, the time period of 15 days to issue the consent from the DISCOMS shall be increased for scrutinizing the applications for consent. Also the compliance of the consumers are not received on time.
- (vi) STU representatives informed that they will prepare the draft procedure for grant of MTOA/LTOA in line with NLDC procedure and the same will be shared with all utilities for their comments/suggestions, if any. In the meantime, all applications for

MTOA/LTOA will be processed through GOAR portal only for Renewable power and Open Access portal (STU) for Non-Renewable power.

(2) Regulatory provision:

(i) DOA Second Amendment Regulations, 2023. Provides as under:

“Provided also that in case of Short-Term Green Energy Open Access, Maharashtra State Load Despatch Centre and in case of Medium / Long Term Green Energy Open Access, the State Transmission Utility shall perform duties of Nodal Agency as stipulated in the procedure framed by Central Nodal Agency.”

(ii) The Procedure for Grant of GEOA by NLDC provides as under:

“Clause 2.5, STU shall be the nodal agency for processing all bilateral long term and medium term Green Energy Open Access applications at the intra state level.

Clause 2.6, while seeking Green Energy Open Access by embedded entities, DISCOMs shall process clearances and send to the nodal agency of the state as per extant Regulations (CERC/SERC)”

(3) Committee observation and Recommendation:

(i) The committee recommended that the procedure for GOAR prepared by NLDC shall be followed by GEOA consumers/ stakeholder.

(ii) The Committee further recommends that for more clarity and hand holding of the GEOA consumers, STU and MSLDC shall prepare the procedure.

(iii) In order to streamline the process of GEOA and for smooth operation, the Committee may hold "GEOA consumer meets/ discussion" to inform/aware the stakeholders/GEOA consumers on the procedure.

(iv) Compliance-related to this issue to be discussed at the next meeting.

Agenda No. 3: Credit Processing to OA Consumer

(1) Committee Discussion:

(i) Representatives for AEML-D stated that currently OA credit processing for Intra-state Transactions is undertaken with delay of 2 - 6 months as GCN's are delayed. AEML-D requested MSEDCL to provide GCN within time.

(ii) MSEDCL Representative informed that credit notes are issued transaction wise. MSEDCL further informed that if generator does the payment on timely basis, then MSEDCL will issue GCN on time.

- (iii) AEML-D Representatives requested some predefined timelines can be provided for submission of GCN to expedite the credit processing.

(2) Regulatory provision: Nil

(3) Committee Observation and Recommendation:

- (i) The Committee recommended AEML-D & TPC-D to provide the list of delayed GCN to MSEDCL so as to study the reasons for delay and resolve the same. Till date, no such information provided by the AEML-D & TPC-D.
- (ii) The Committee suggested that all the Distribution Licensees shall sit together and resolved the issue mutually.
- (iii) Further, SLDC may prepare SoP in consultation with Distribution Licensees to deal with the issues.
- (iv) **Compliance-related to this issue to be discussed at the subsequent meeting.**

Agenda No. 4: Clarity on Relinquishment Charges for termination of LTOA/MTOA by partial OA Consumers and Collection of relinquishment charges:-

(1) Committee discussion:

- (i) Representatives of MSEDCL stated that one of the OA consumer approached MSEDCL for cancellation of MTOA. While cancellation of MTOA, MSEDCL has forwarded that Application to STU. STU in its Reply stated that the OA consumers' needs to pay the relinquishment charges.
- (ii) Representatives of MSEDCL stated that there is no such Clause for recovery of relinquishment charges of 30 days before cancellation of MTOA in DOA Regulation, 2016 and DOA First Amendment) Regulation, 2019.
- (iii) Regulation 27.2 of MERC (Transmission Open Access) Regulation 2016 (TOA Regulations 2016) is not applicable to the consumer availing open access under DOA Regulations 2016. As per TOA Regulation 2016, STU being the nodal agency for MTOA/LTOA, the relinquishment charges shall be recovered by the Nodal agency.
- (iv) Representative of AEML-D stated that
 - (a) Presently relinquishment charges for non-firm OA are calculated based on the contracted capacity and the remaining contracted period, and the charges can be quite substantial as CUF of generator is around 20% of Plant capacity. OA Consumer may need to reduce/cancel existing OA capacity to make it economically viable in case of changing market and Regulatory environment.

- (b) Higher relinquishment charges lead to disincentive for OA Consumer to change their operational plans or surrender their OA capacity, even if it would be more economically viable.
- (c) Existing framework for relinquishment charges does not adequately consider the unique characteristics of renewable energy generation i.e. CUF.
- (v) STU informed that,

The consumer granting Open access from MSEDCL follows MERC (Distribution Open Access) Regulation, 2016, however since they are using STU network for their Open access, MERC (Transmission Open Access) Regulation 2016 is also applicable to them and thus Clause 27.2 of MERC (Transmission Open Access) Regulation 2016 is applicable to the consumer. Further also notified that notice is a part of procedure and relinquishment charges are the penalty for terminating the Open access before time.

Regulatory provision:

Regulation 27.1 and 27.2 of TOA Regulations 2016 and its Amendment Regulations, 2019.

Currently the relinquishment charges are calculated as per quantum approved for MTOA/LTOA and the transmission tariff approved by MERC for MTOA/LTOA in tariff orders issued by Hon'ble MERC time to time.

Committee Recommendation:

- (i) The regulatory provisions are clear on the issue & all stakeholders should follow the same.
- (ii) In order to seek further clarification on the issue the concerned stakeholder may approach Hon. MERC. The same decision of the Committee shall be intimated to the consumer with 10 days.
- (iii) The issue may be considered for amendment to the DOAR 2016.

Agenda No. 5: Procedure for cancellation of MTOA and LTOA:

Committee discussion:

MSEDCL stated that there are frequent cancellations of MTOA and LTOA permission by the applicant. There is no clarity for minimum cancellation period of MTOA/ LTOA. MSEDCL suggested that the minimum cancellation period for MTOA & LTOA should be 5 /7 years.'

STU submits that

LTOA means the right to use the Intra-State Transmission System for a period exceeding seven years and MTOA means the right to use the Intra-State Transmission System for a period exceeding three months but not exceeding five years. It is clear from the definitions that, consumer should avail transmission rights minimum seven years of LTOA and three months for

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MTOA. After that consumer can relinquish their capacity rights partly or fully as per Regulation 27.1 and 27.2 of Maharashtra Electricity Regulatory Commission (Transmission Open Access 2016. Hence OA Applicant should avail minimum period of MTOA/LTOA of OA rights.

Regulatory provision: Nil

Committee Recommendation:

The Committee recommends Hon. MERC to bring more clarity on the same during subsequent amendments.

Agenda No. 6: Providing login to view scheduling of RE generators:-

Committee Discussion:

MSLDC informed that they have shared the login credential to all Distribution licensees viz MSEDCL (Chief Engineer - RE), TPCL, AEML, BEST, Railways, etc. in June-2019 itself. The same have been re-shared to nodal officer of MSEDCL's RE section on 27.10.2023. Through said login, buyers can see the PSS-wise schedules submitted by QCA.

In accordance with the regulation No. 5.11 & 5.13 of the MERC (Forecasting, Scheduling & Deviation Settlement for Solar & Wind Generation) Regulations, scheduling is to be carried out at PSS level and hence, the individual generator-wise schedules are not available at MSLDC. Also, RE schedules are integrated with the State Scheduling Software, wherein buyers can see the consolidated RE schedules.

Regulatory provision: Regulation No. 5.11 & 5.13 of the MERC (Forecasting, Scheduling & Deviation Settlement for Solar & Wind Generation) Regulations.

Committee Observation and Recommendation:

- (i) Buyers should access the REMC web portal provided by MSLDC to see PSS-wise schedules. Also, buyers should access the web portal of State Scheduling software to see consolidated RE schedules.
- (ii) **Compliance-related to this issue to be discussed at the subsequent meeting.**

Agenda No. 7: Application (Non –Renewable/Non-EHV consumers) to be forwarded by distribution Licensee for issuance of NOC from STU for grant of partial LTOA/ MTOA as per clause 9.6 and 10.4 of DOA Regulations, 2016.

Committee discussion:

STU has developed Open Access portal and made live from 03.05.2024. STU requested all Distribution Licensees/ consumer to apply Open access application through online portal only and all distribution licensees to give consent within time. MSEDCL requested to provide timeline for application for MTOA/LTOA application to apply.

Further STU requested the list of consumers who were given MTOA/LTOA without consent from STU and their MTOA/LTOA were terminated without consent from STU.

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MSEDCL assured that MSEDCL will inform STU before cancelling MTOA/LTOA henceforth.

Regulatory provision: clause 9.6 and 10.4 DOA Regulations, 2016.

Committee observation Recommendation:

- (i) The Committee directed STU to prepare the procedure for application and directed MSEDCL to inform STU before cancelling MTOA/LTOA henceforth.
- (ii) Further STU requested the list of consumers who were given MTOA/LTOA without consent from STU and their MTOA/LTOA were terminated without consent from STU.
- (iii) MSEDCL assured that it will inform STU before cancelling MTOA/LTOA henceforth.

Agenda No. 8

STU informed that MSEDCL is not remitting the collected transmission charges from POA consumers as per clause 14.5 of Distribution Open Access Regulations, 2016.

Committee Discussion:

STU requested MSEDCL to remit the transmission charges collected from Partial Open Access consumers as specified under regulation. It was also stated that the issue of delay payment charges to the distribution licensee also arises due to non-remittance of transmission charges within seven days.

MSEDCL replied that the matter of POA charges is within purview of their higher authorities and the decision regarding the same will be informed accordingly.

Regulatory provision:

Regulation 14.5 of provides Regulations, 2016 for payment of transmission charges to STU by Distribution Licensees.

Committee Observation and Recommendation:

- (i) The Committee asked MSEDCL to follow the regulation in the matter and expedite the payment of POA charges as per the provisions of the Regulations.
- (ii) STU may approach the Commission for non-compliance of the DOA Regulations.
- (iii) Further the matter is pending before Hon'ble ATE as challenged by MSEDCL.
- (iv) **Compliance-related to this issue to be discussed at the subsequent meeting.**

Agenda No. 9: Insufficient amount of LC in respect of MSEDCL & M/s AEML-D- action for non-compliance of MERC Regulations thereof.

Committee Discussion:

The regulation provides for opening of LC by TSU, however there is no provision for opening of insufficient amount of LC by TSU. MERC in Case No.162 of 2016 directed to open ESCROW account instead of LC. However, MSEDCL and AEML-D has neither opened ESCROW account

nor has submitted sufficient amount of LC as per aforesaid regulation. MSEDCL and AEML-D will discuss with the concerned department and will submit the compliance of the same.

Regulatory provision: MERC TOA Regulations Access 2016,

Clause 24,

“The Applicant for Long-term or Medium-term Open Access shall open an irrevocable revolving Letter of Credit in favour of the Nodal Agency to the extent of the estimated amount of various charges payable for a period of two months.”

Committee Observation and Recommendation:

- (i) The committee recommended that the utilities needs to follow the Regulations/ Orders of the Commission in this regard.
- (ii) Adequate counter check & further actions to be taken for such scenarios may be mandated through upcoming MYT regulations.
- (iii) STU may approach the Commission for non-compliance of the DOA Regulations.
- (iv) **Compliance-related to this issue to be discussed at the subsequent meeting.**

Agenda No. 10: Clarification is sought regarding the determination of transmission charges concerning whether they apply to the input metered units or the actual energy consumption at the consumer's end (Input MU or the actual energy drawl at the consumption end) in open access scenarios. Consequently, there's a need to ascertain the transmission charges payable by the Distribution Licensee.

Committee Discussion:

TPC-D submits that;

- Wheeling has been defined in Section 2(76) of the Electricity Act 2003 and is quoted below:
 - *“(76) “wheeling” means the operation whereby the distribution system and associated facilities of a transmission licensee or distribution licensee, as the case may be, are used by another person for the conveyance of electricity on payment of charges to be determined under Section 62;”*
- From the above definition it is clear that wheeling would involve three ingredients viz., Usage of distribution system of distribution licensee, such usage has to be by another person Usage can be only on payment of charges.
- Hon’ble commission also mentioned the philosophy of wheeling charges in the order dated 09.03.2009 in case no 80 of 2008 as, *“2.4.1 Wheeling Commission’s Ruling :*
The Commission notes that the philosophy behind levy of T & D Loss charges is substantially different from that of wheeling charges and, therefore, these two charges should not be bundled together. Wheeling charges are meant to include charges for use

of the utility's physical infrastructure for wheeling and the administrative expenses involved.

- Forum of Regulators in “developing model regulations on methodology for calculation of open access charges and banking charges for green energy open access consumers” recommended that, *“Transmission charges and wheeling charges Transmission Charge shall be computed in Rs/kWh and it shall be charged on the actual energy transmitted.”*
- MERC (DOA) Regulation 2016, Regulation 18.2. Distribution System losses states that, *“The buyer of electricity shall bear the approved wheeling losses of the Distribution System and not any part of the commercial losses as may be determined by the Commission from time to time.”*
- The CEA in its draft procedure for verification of Captive Status at points no 9.2 states that, *“Technical Loses in electrical network and Energy Storage System shall be included in the **energy consumption of the Captive users.** The losses figures shall be as per the following: 9.2.1. Transmission losses in ISTS network as per weekly published data of POSOCO*
 - *9.2.2. Losses in STU network based on published figure of SLDC.*
 - *9.2.3. Losses in Discom network as per published figure in ARR/Tariff order*
- The purpose of wheeling charges, the Wheeling charges are meant to include charges for use of the utility's physical infrastructure for wheeling and the administrative expenses involved and not for loss.
- The distribution licensee has already invested the money for supply of electricity to the consumers or class of consumers of the area of his supply for which the distribution license is issued. Therefore, if a consumer or class of consumers want to receive the supply of electricity from a person other than the distribution licensee of his area of supply, he has to compensate expenses of physical infrastructure distribution licensee for wheeling of power.
- MSEDCL is levying wheeling charges on actual consumption to the consumers who receive supply of electricity from the distribution licensee of his area of supply. If wheeling charges are levied at consumption end to consumer who receive supply of electricity from the person other than the distribution licensee of his area of supply then, it seems open access consumers are utilizing the licensee network without paying any charges which is an undue benefit to the open access consumers.

Sub: Minutes of 6th Distribution Open Access Monitoring & Review Committee meeting held on 08.05.2024.

- Hence either Discoms should be levied charges on actual energy Consumption or Open access consumer shall be charged on Input energy which is their actual consumption as the *buyer of electricity shall bear the approved wheeling losses of the Distribution System.*
- TPC-D suggested that transmission charges should be applied at same periphery.

Regulatory provision:

Practice Directions Processing of Open Access Applications of MERC (Distribution Open Access) and (Transmission Open Access) Regulations, 2016 dtd. 08.03.2017.

Committee Observation and Recommendation: -

- (i) The regulatory provisions are clear on the issue & all stake holders should follow the same.
- (ii) **The Commission has issued the various Orders on this issue based on the Hon'ble ATE Judgment. The matter needs to be closed.**

Agenda No. 11: Open Access Consumer schedule on MSLDC scheduling software.

Committee discussion:

TPC D requested to give final Open schedules on MSLDC website. MSLDC informed that whatever is the latest updated on website be taken as final schedule.

Schedules of Non-RE OA transactions are available in MSLDC scheduling software login (and not on MSLDC Website).

Regulatory provision: Nil

Committee Recommendation:-----

Compliance-related to this issue to be discussed at the subsequent meeting.

The meeting was concluded with vote of thanks.

-----XOX-----

  MAHATRANSCO Maharashtra State Electricity Transmission Co. Ltd.	MAHARASHTRA STATE ELECTRICITY TRANSMISSION CO. LTD. CIN: U40109MH2005SGC153646 Office of the Chief Engineer (STU) Address: 'Prakashganga', MSETCL, Plot no. C-19, E-Block, BKC, Bandra (E), Mumbai-400051 Website: www.mahatransco.in Email Id: cestu@mahatransco.in Contact no: (O) 022-2659 5176
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MSETCL/CO/STU-R&C/

No- 6084

Date:

6 SEP 2024

To,
The Secretary,
Maharashtra Electricity Regulatory Commission,
13th floor, Centre No.1, World Trade Centre,
Cuffe parade Colaba,
Mumbai- 400005

Sub: Minutes of 7th Distribution Open Access Monitoring & Review Committee meeting held on 08.08.2024.

Ref: (i) MSETCL/CO/STU-R&C/ 05510 dtd 20.09.2021.

(ii) 7th Distribution Open Access Monitoring & Review Committee meeting held on dated 08.08.2024.

Dear Sirs,

With reference to the above subject, as per the directives of Hon'ble Commission in MERC (Distribution Open Access) First amendment Regulations 2019, a Committee is constituted vide letter under reference (i). Accordingly, 7th DOA meeting was held on 08.08.2024 through VC. The same was attended by the representative of the Distribution Licensees, MSLDC and Hon'ble MERC.

Minutes of 7th Distribution Open Access Monitoring & Review Committee meeting is enclosed herewith.

Thanking you.

Encl: As above

Yours Faithfully,


(Peeyush Sharma)
Chief Engineer (STU)

Sub: Minutes of 7th Distribution Open Access Monitoring & Review Committee meeting held on 08.08.2024.

To,

- 1) The Director (Electrical Engineering),
MERC, 13th Floor, Centre No.1, World Trade Centre, Cuffe Parade,
Colaba, Mumbai-400 005.
Email id: prafulla.varhade@merc.gov.in
- 2) The Deputy Director (Technical),
MERC, 13th Floor, Centre No.1, World Trade Centre, Cuffe Parade,
Colaba, Mumbai-400 005.
Email id: popat.khandare@merc.gov.in
- 3) The Chief Engineer,
Maharashtra State Load Dispatch Centre,
Kalwa, Thane-Belapur Road, Airoli Navi- Mumbai-400 708.
Email id: cesldc@mahatransco.in
- 4) The Chief Engineer(Commercial),
Maharashtra State Electricity Distribution Co. Ltd,
5th floor Prakashgad, Plot No.G-19, Anant Kanekar Marg,
Bandra (East), Mumbai-400 051.
Email id: cecomm@mahadiscom.in , cecommho@mahadiscom.in
- 5) Assistant Vice President,
Adani Electricity Mumbai Ltd (Distribution Business),
CTS 407/A, (New), 408 (old) village,
7th floor, Eksar Devi Das lane,
Off SVP road, Borivali (west), Mumbai 400 103.
Email id: abaji.naralkar@adani.com
- 6) Group head Regulatory,
M/s. Tata Power Co. Ltd,
Backbay receiving Station, 148, Lt. Gen. J. Bhonsale Marg,
Nariman Point, Mumbai-400021.
Email id: hawwa@tatapower.com
- 7) The Deputy Chief Engineer (Power),
BEST,
1st Floor Multistoried Annexe Building, BEST Marg,
Colaba, Mumbai-400 001.
Email id: derc@bestundertaking.com
- 8) The Chief Electrical Distribution Engineer,
Central Railway,
Electrical Branch, 2nd floor, Parcel office Building, CST, Mumbai-400 001.
Email id: dyceetrdcrly@gmail.com

Sub: Minutes of 7th Distribution Open Access Monitoring & Review Committee meeting held on 08.08.2024.

Minutes of meeting of 7th Distribution Open Access Monitoring & Review Committee held on dt. 08.08.2024 through VC.

Following members have attended the meeting:

Members	Designation and Organization
Shri Shashank Jewalikar	Executive Director, MSLDC
Shri. Peeyush Sharma	CE, STU
Shri. Girish Pantoji	CE(I/C), MSLDC
Shri Popat Khandare	Deputy Director (Tech), MERC
Shri. Pravin Y. Ganvir	Deputy Director (Tech), MERC
Smt Sharda Takpere	SE, STU-R&C
Shri. Vinay Singh	SE, Commercial, MSEDCL
Smt Hawaa Inamdar	Lead Regulatory WR - Compliances ,TPC-D
Smt. Geeta Bhadarka	Lead Associate - Connection Management- TPC-D
Shri Ranjeet Savardekar	Assistant Vice President, ABT Cell, AEML-D
Shri. Nishant Godha	General Manager , ABT Cell, AEML-D
Shri. Sudeep Rawat	Central Railway

STU welcomed all the Open Access Monitoring Committee Members along with some consumer representatives of Distribution Licensees, BEST representative was not present in the VC meeting.

Agenda No. 1:

Difficulties in processing of Green Energy Open Access (GEOA) applications through National GOAR portal and MSLDC's existing STOA software.

In order to discuss the issues in the implementation of GEOA, the OA monitoring Committee has invited some of the major OA consumers. Following OA consumer were present for the Meeting through VC:

1. Mr.Sanjay Chitnis & Ms. Namrata Anvekar, Global NTT
2. Mr. Ujjawal Surana & Mr. Mayank Gupta, Avaada
3. Mr. Vipin Kathait & Mr. Parol Binoy, Tata Power.
4. Mr. Satyapal Dahiwade & Mr. Pritpal Singh Kang, JSW Pvt. Ltd.

Sub: Minutes of 7th Distribution Open Access Monitoring & Review Committee meeting held on 08.08.2024.

Regulatory provision:

- i. MERC DOA Regulation (Second Amendment, 2023).
- ii. GOAR procedure for Grant of Green Energy Open Access issued by NLDC.

Committee Discussion:

(i) MSEDCL comments:

At present, Open Access consumers apply directly on MSEDCL portal for grant of Partial LTOA/MTOA applications. MSEDCL is not receiving any GEOA applications on their portal as no login is provided for MSEDCL in GOAR portal. Hence, MSEDCL may facing issues for billing process. In GOAR portal, the requisite information of the applicant needs to be sent on e-mail to Distribution Licensee and Distribution Licensee needs to provide its consent to STU/MSLDC via email. It will become very difficult to provide consent for such GEOA consumers as there are numerous applications and also there may be difficulty in billing process due to non- integration of softwares.

(ii) STU Comments:

The software development for processing of GEOA applications along with integration with GOAR portal is in under process. Meanwhile STU need to process the application as per existing procedure and MERC Regulations.

(iii) MSLDC Comments:

The activities for development of new Short Term Green Energy Open Access is at initial stage and MSLDC is working on development of software and integration with National GOAR portal. Till then the application to be processed as per existing procedure. For the same, interim procedure for short term will be prepared by MSLDC and for the long term and medium term, STU will be prepared for the long term and medium term.

- (iv) MERC Representatives suggested that timeline and action plan may be fixed for software integration and interim methodology for processing of application.

(v) OA Consumer Comments:

- (a) (Mr. Sanjay Chitnis) said that the consumers are not able to complete registration process due to difficulties in GOAR portal.
- (b) Further a consumer (Ms.Namrata) stated that for every contract account new email ids are required and it is difficult to maintain numerous email ids for each contract account. Also, no clarity is given about Techno commercial report.
- (c) MSLDC clarified that techno commercial report is not mandated document. However metering report, electricity bill or meter installation report, contract demand and single line diagram are the major documents required for registration. Any documents submitted should be certified by respective distribution licensees.

- (d) Consumer (Mr. Ujjwal Surana) requested to allow consumer less than 1MW to process as per GOAR rules in the existing procedure.
- (e) AEML D clarified that currently distribution licensee portal is enabled to process application above 1MW and committee needs to decide on the same and distribution licensee bills can be uploaded as techno commercial report.
- (f) TPC-D asked that if there is no limit for contract demand as per GOAR for RE then why verification is needed for contract demand.
- (g) MSEDCL stated that as per clause No: 4 of Second Amendment of DOA regulation, *'Open Access consumers sourcing power from renewable energy generators, capacity limit up to Contract Demand or Sanctioned Load as specified in Regulation 3.2 shall not be applicable, but shall be subject to conditions of resultant power flow specified'*
- (h) Consumer who has applied an application on GOAR portal, requested for clarification about distribution licensee consent and payment details on GOAR portal.
- (i) STU clarified that for application in GOAR portal, the consumer needs to input UTR details of payment as there is no payment mechanism in GOAR portal and the consent will be taken by STU from respective distribution licensee and the same will be uploaded in the portal.
- (j) Consumer asked clarification regarding application to distribution licensee or STU for partial open access and contract demand.
- (k) MSEDCL clarified on GOAR portal, consumer should apply on GOAR portal for open access where STU is nodal agency for Open access.
- (l) MSLDC further added that they have discussed these issues with NLDC and software developers. NLDC conveyed that they are working on it to resolve the issues and development of additional required fields. Further MSLDC stated that NLDC had conveyed it will take tentatively two months (i.e. by end of September 2024).
- (m) MSLDC suggested that all distribution licensees also need to modify their software and integrate with MSLDC software for smooth implementation of process.
- (n) OA Consumers suggested to continue with old process until the software is fully developed. Presently distribution licensees have no limit on captive contract demand but if NLDC or SLDC will bring any limitation, contract will be jeopardized. As per DOA Second Amendment clause (4), Open Access consumers sourcing power from renewable energy generators, capacity limit subject to resultant power flow.

Sub: Minutes of 7th Distribution Open Access Monitoring & Review Committee meeting held on 08.08.2024.

- (o) Consumer (Mr. Ujjwal) stated that there is no clarification on resultant power flow, the consumer requested to display the formula or method to calculate the resultant power flow so as to ascertain the consumer whether he is eligible for Green open access.
- (p) MSEDCL clarified that if there are multiple generators resultant power flow may vary. The resultant flow depends on drawal point of CT and contract demand, However there is no major difference between contract demand and resultant power flow. Further clarified that there is no limit to injecting but there will be limitation at drawal.
- (q) OA Consumer raised the issue that in case of EHV OA consumer, if power is fed to EHV consumer, who will certify the power injecting into the grid.
- (r) MSLDC clarified that respective distribution licensee is responsible to certify about the power injecting into the grid in whose area generator is located.
- (s) TPC-D Stated that the respective Distribution Licensee in the area where the generator is located is kindly requested to continue issuing OA consent and Generation Credit notes for EHV connected Generators, as clarified by MSLDC. If this is not the case, we kindly request clarification regarding the application processing and issuance of GCN.
- (t) Issuing credit notes is MSEDCL's internal process. MSEDCL issues credit notes where generator is in MSEDCL area and consumer is in other Licensee area. On the application of Licensee And / OR MSLDC, MSEDCL issues consent for such generator. On the basis of consent, credit note is issued. MSLDC vide E-mail dated 30.05.2024 clarified that the generators which are connected to EHV do not require consent of MSEDCL. Hence, it will not be proper to issue credit note to the generators which are connected on EHV. The reference of GoM letter dated 11.05.2022 given by MSLDC says that, Monthly Generation Credit Note to be issued by Developer / MSEDCL. As such, MSEDCL may issue credit notes for the generator which are connected to MSEDCL distribution network and Developers shall provide the monthly generation data for the generators which are connected to EHV."
- (u) MSLDC highlighted the Annexure "G" of Hon'ble Maharashtra Ministry of Power Circular No. "शासन निर्णय क्रमांक: अपाऊ-2020/प्र.क्र.137 (अ)/ऊर्जा-7" dated 11.05.2022 wherein MSEDCL has been entrusted the responsibility of issuance the Generator Credit Note (GCN). In view of this, MSLDC reiterated that host distribution licensee (generator located under respective discom's area) shall issue the credit note to the generator irrespective of voltage level.

Sub: Minutes of 7th Distribution Open Access Monitoring & Review Committee meeting held on 08.08.2024.

Committee Observation and recommendation:

- (i) Further to resolve the billing issues and decide the methodology for processing of application in the interim period, STU suggested to coordinate and conduct a meeting among MSLDC, STU & distribution licensee within 7 days for finalizing methodology till development & integration of software.
- (ii) STU further stated that they invited comments/ suggestions on draft procedure for LTOAA /MTOA Green OA and the same is uploaded on web portal.
- (iii) Distribution Licensees should continue the existing practice/procedure of issuance of GCN to all generators irrespective of voltage level until further directions.

Agenda No. 2:

Treatment of Transmission Charges paid for supply of power to AEML SEEPZ Limited (ASL) from various wind generators and refund/adjust the excess transmission charges thereof..

Regulatory provision: Regulation 66 of MERC MYT Regulations 2019.

Committee discussion:

AEML submission:

ASL has procured power from Wind & Solar generators through Traders MPL & AEL for the period from Jan-24 onwards. STOA was booked & Transmission charges on total capacity was billed by SLDC. Same is also paid to SLDC. As per the methodology defined in 4th OA Committee meeting (in case of EON), refund of transmission charges is requested by MPL to SLDC based on actual GCN received for the period from Jan-24 to May-24. However SLDC has not yet refunded transmission charges amounting to Rs. 4.8 Cr

ASL requested that the refund of transmission charges as per the methodology approved in 4th OA committee meeting should be followed wherein refund to be provided within 15days of submission of actual generation data (GCN).

MSLDC submission: The transmission charges were levied based on the approved open access quantum for the entire period, as per the Transmission Open Access Regulations (TOAR), 2016.

Now, M/s Manikaran Power Ltd. (MPL) has raised the objection of the calculation of transmission charges via letter u/r (1). The same issue was raised by M/s EON Kharadi for allocation of transmission charges on actual basis During the 4th DOA review committee meeting held on 27.04.2023, the matter was discussed in detail, and it was concluded that the calculation of Transmission Charges for power sourced from renewable energy (RE) generators should be based on actual data using the Generation Credit Note (GCN). The relevant para. of the MOM are as under :

"4.1.9 In case any new TSU (including deemed distribution licensees such as SEZs) avails open access during the year, or starts operation prior to issuance of the MTR Order, such TSU shall

Sub: Minutes of 7th Distribution Open Access Monitoring & Review Committee meeting held on 08.08.2024.

be liable to pay the Transmission Charges as applicable at the rate of short term Transmission Tariff determined as per this Order, corresponding to the energy units procured.”

However, after verification of the actual demand of ASL and deviation bills issued, it is observed that most of its demand is met through Inter Discom Transfer (IDT) with AEML-D. The transmission charges for these inter discom Transfer (IDT) were not levied by MSLDC. Thus, MSLDC proposes to levy the Transmission Charges for purchase of power from Inter Discom Transfer.

Also, for some periods it is observed that ASL has fulfilled its demand through deviation. As per TOA Regulation 2016, any TSU availing open access is liable to pay additional regulatory charge at a rate of twenty-five percent of Transmission charges for excess in TCR. The relevant clause is reproduced below-

“14.5. A Transmission System User availing Open Access shall also be liable to pay an additional Regulatory Charge at the rate of twenty-five percent of the Transmission Charges for the use of an Intra-State Transmission System in excess of its Transmission Capacity Rights.”

Thus MSLDC also proposes to levy Transmission charges and additional regulatory charges to ASL for the period from start of its operation until allocation of Based TCR to ASL as well as inclusion in the MYT order as long term TSU by MERC.

The Transmission charges will be levied on actual basis computed for only RE (Solar and Wind) as discussed in 4th DOA review meeting.

The summary of the Transmission charges and additional regulatory charges to be levied will be as below:

ASL	FIRM Power (INTRA+INTER)	RE Power (SOLAR+WIND)	Inter Discom Transfer (IDT)	Deviation
Transmission Charges	YES (Procured Basis)	YES (Actual Basis)	YES (Procured Basis)	YES
Additional Regulatory Charges	NO	NO	NO	YES (Twenty Five Percent of Trans. Charges)

Further, MSLDC proposes to submit this methodology for any new upcoming Deemed Distribution Licensee notified by MERC which are not sharing the Transmission charges on monthly basis as per MYT order.

MSLDC further stated ASL is connected directly to 33kv feeder, therefore they should pay the charges. MSLDC suggested that, the refund should be done to trader immediately and the billing through IDT charges is to be done. With respect to charges on overdrawn, deviation charges are also transmission charges.

AEML stated that AEML SEEPZ Ltd. (ASL) is a deemed Distribution Licensee & its commercial operation started from 01.11.2023. Hence BPCR was not determined or approved by Commission & same will be approved from upcoming MYT control period i.e FY25-26 onwards.

Sub: Minutes of 7th Distribution Open Access Monitoring & Review Committee meeting held on 08.08.2024.

In view of above Additional Regulatory charges cannot be billed to ASL as BTCR is not determined / Approved for ASL

MSLDC also clarified that Additional Regulatory charges is not applicable and only Short Term Transmission charges will be applicable on the Overdraw energy.

Accordingly Short Term Transmission charges will be applicable as below,

ASL	FIRM Power (INTRA+INTER)	RE Power (SOLAR+WIND)	Inter Discom Transfer (IDT)	Deviation
Transmission Charges	YES (Procured Basis)	YES (Actual Basis)	YES (Procured Basis)	YES (Over Draw Energy)

AEML further requested that the GCN refund should be done earliest.

Committee Observation and recommendation:

MSLDC to levy the transmission charges as per below methodology:

AEL SEEPZ LTD	FIRM Power (INTRA+INTER)	RE Power (SOLAR+WIND)	Inter Discom Transfer (IDT)	Deviation (Overdraw Quantum)
Transmission Charges	YES (Procured Basis)	YES (Actual Basis on the basis of GCN)	YES (Procured Basis)	YES (As per DSM Bills)

Accordingly, the transmission charges will be refunded to M/s MPL. Also, Transmission charges on IDT power purchased and Deviation (Overdraw energy) will be billed separately to M/s AEML SEEPZ LTD.

MSLDC to do the transmission charges refund based on Generator Credit Note issued by MSEDCL to generator at the earliest.

The same methodology will be adopted for the new deemed distribution licensees (DDL) until the inclusion in MYT order.

Agenda No. 3:

Discussion on letter of M/s Ambad Industries & Manufacturers association (AIMA) forwarded by Hon'ble MERC requesting amendments in certain clauses of MERC DOA and TOA Regulations, 2016 and its amendment (Attached as Annexure-1)

Regulatory provision:

- MERC DOA regulation (second amendment 2023).
- GOAR procedure for Grant of Green Energy Open Access issued by NLDC.

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Committee discussion: No representative was present from M/s AIMA.

As per clause No 4, Amendment to Regulation 3 of the Principal Regulations of DOA (second amendment)..

'Provided also that in case of multiple connections before start of Green Energy Open Access, consumers shall intimate the Distribution Licensee in advance regarding the percentage share of energy generation from the Renewable Energy projects to each connection so as to enable the Distribution Licensee to account for the same appropriately

Provided also that Green Energy Open Access consumers shall not change the quantum of power consumed through open access for at least twelve-time block'

AIMA suggested to change quantum of power consumed through open access for twelve-time blocks to six time blocks.

Committee Observation and recommendation:

Since all the points submitted by M/s AIMA has no proper justification and the clauses are as per the rules and have already gone to through thorough regulatory process. Thus no further discussion was carried out.

Agenda No. 4:

Submission of additional GNA requirement as per Clause 19.2 of the CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022 for next 3 (three) financial years.

Regulatory provision:

CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022, Clause 19.2

Committee Observation and recommendation:

STU requested all the distribution licensees to submit additional GNA requirement as per Clause 19.2 of the CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022 for next 3 (three) financial years by 31st August 2024.

Agenda No. 5:

Submission of OA permission details to MSLDC :

Regulatory provision: (Forecasting, Scheduling and Deviation Settlement of Solar and Wind Generation) (First Amendment) Regulations, 2024

Committee Observation and recommendation:

MSLDC informed that MERC has notified (Forecasting, Scheduling and Deviation Settlement of Solar and Wind Generation) (First Amendment) Regulations, 2024. Trail mode will be initiated from 4th October 2024. As such it is requested to submit Open Access permission issued by

Sub: Minutes of 7th Distribution Open Access Monitoring & Review Committee meeting held on 08.08.2024.



distribution licensees timely and correctly before 27th of every month to avoid delay in scheduling and energy settlement issues.

MSLDC informed that they have invited comments/ suggestions on draft procedure for implementation of Forecasting, Scheduling and Deviation Settlement of Solar and Wind Generation) (First Amendment) Regulations, 2024 by stakeholders before 21st August 2024.

MSLDC further informed that same generator having multiple turbines receive multiples sanctions of Open access against each generator. There is no clarity and causes conflicts in scheduling and are unresolved. MSLDC therefore requested to all distribution licensees to submit the proper and timely data.

The meeting was concluded with vote of thanks.

-----XOX-----

  MAHATRANSCO Maharashtra State Electricity Transmission Co. Ltd.	MAHARASHTRA STATE ELECTRICITY TRANSMISSION CO. LTD.
	CIN: U40109MH2005SGC153646
	Office of the Chief Engineer (STU)
	Address: 'Prakashganga', MSETCL, Plot no. C-19, E-Block, BKC, Bandra (E), Mumbai-400051
	Website: www.mahatransco.in
	Email Id: cestu@mahatransco.in Contact no: (O) 022-2659 5176

MSETCL/CO/STU-R&C/

Date: **13 SEP 2024**

No E 6 2 8 4

To,
The Secretary,
Maharashtra Electricity Regulatory Commission,
13th floor, Centre No.1, World Trade Centre,
Cuffe parade Colaba,
Mumbai- 400005

Sub: Minutes of the Meeting held @ MSLDC on 14.08.2024

Ref: (i) 7th Distribution Open Access Monitoring & Review Committee meeting held on dated 08.08.2024.

ii) Hon'ble APTEL Judgement dated 05th July 2024 in Appeal No.95 of 2024

Dear Sirs,

In the 7th DOA monitoring meeting dtd. 08.08.2024, the OA consumer's issues relating problems facing by OA consumers of discoms while Processing/registering the OA application in GOAR portal developed by NLDC, CE (STU) was in view that, STU/ MSLDC will have to prepare interim procedure OA applications till the integration of STU/SLDC software with GOAR portal and meeting is called for discussion of this issue. Further, Director (Operation), MSETCL directed to discuss the issue of implementation of Hon'ble APTEL Judgement dated 05th July 2024 in Appeal No.95 of 2024 in the same meeting.


Accordingly, the meeting was held on 14.08.2024 at MSLDC office. The same was attended by the representative of the Distribution Licensees, MSLDC and STU.

Minutes of meeting are enclosed herewith.

Thanking you.

Encl: As above

Yours Faithfully,


(Peeyush Sharma)
Chief Engineer (STU)

To,

- 1) The Chief Engineer,
Maharashtra State Load Dispatch Centre,
Kalwa, Thane-Belapur Road, Airoli Navi- Mumbai-400 708.
Email id: cesldc@mahatransco.in
- 2) The Chief Engineer(Commercial),
Maharashtra State Electricity Distribution Co. Ltd,
5th floor Prakashgad, Plot No.G-19, Anant Kanekar Marg,
Bandra (East), Mumbai-400 051.
Email id: cecomm@mahadiscom.in , cecommho@mahadiscom.in
- 3) Assistant Vice President,
Adani Electricity Mumbai Ltd (Distribution Business),
CTS 407/A, (New), 408 (old) village,
7th floor, Eksar Devi Das lane,
Off SVP road, Borivali (west), Mumbai 400 103.
Email id: abaji.naralkar@adani.com
- 4) Group head Regulatory,
M/s. Tata Power Co. Ltd,
Backbay receiving Station, 148, Lt. Gen. J. Bhonsale Marg,
Nariman Point, Mumbai-400021.
Email id: hawwa@tatapower.com

Minutes of the Meeting held @ MSLDC on 14.08.2024

Following members have attended the meeting:

Members	Designation and Organization
Smt. Sharda Takpere	SE, STU-R&C
Shri. Umesh Bhagat	SE, MSLDC
Shri. Vinay Singh	SE, Commercial, MSEDCL
Smt. Hawaa Inamdar	Lead Regulatory WR - Compliances ,TPC-D
Smt. Geeta Bhadarka	Lead Associate - Connection Management- TPC-D
Shri Ranjeet Savardekar	Assistant Vice President, ABT Cell, AEML-D
Shri. Nishant Godha	General Manager , ABT Cell, AEML-D

STU welcomed all the participants of the meeting and briefly highlighted the issues that have been included in the agenda for the meeting.

Agenda No. 1:

Difficulties in processing of Green Energy Open Access applications through National GOAR portal.

Regulatory provision:

- i. MERC DOA Regulation (Second Amendment, 2023).
- ii. GOAR procedure for Grant of Green Energy Open Access issued by NLDC.

Discussion:

- (i) MSEDCL comments: MSEDCL states that, due to problems facing by OA consumers of discoms while Processing/registering the OA application in GOAR portal developed by NLDC, it is necessary to follow the earlier procedure for processing OA application till the integration of STU/SLDC software with GOAR portal. MSEDCL also requested STU to send scrutinized OA applications for MSEDCL consent as per the MERC (DOA/TOA) Regulations 2016 and their amendment Regulations 2019. MSEDCL also suggested that OA consumers have to submit a Notarized Annexure containing summary/short details

of PPA with OA application. MSEDCL also requested that, OA consumer will have to apply simultaneously on the STU/Discom portal for LTOA/MTOA in case of nodal agency is STU and on SLDC/Discom for STOA in case of nodal agency is SLDC. The submission of OA application on Discom portal is only for billing purposes only.

- (ii) MSLDC stated that NLDC and MSLDC working on integration of STU/SLDC software with GOAR Portal till then the application to be processed with existing procedure and it is necessary to prepare interim procedure for processing of OA application. SLDC will prepare interim procedure for STOA applications.
- (iii) STU stated that till the development of software integration work of STU/MSLDC software with GOAR portal, OA consumers having PPA with Renewable/Non-Renewable generator can apply to OA portal developed by STU for availing LTOA/MTOA. STU agreed with SLDC for preparation of interim procedure for processing of OA application and will prepare interim procedure for MTOA/LTOA application.
- (iv) AEML-D and TPC-D have agreed with SLDC and STU for preparation of interim procedure for OA applications and also agreed with MSEDCL request for submission of Notarized Annexure containing summary/short details of PPA with OA application.
- (v) MSEDCL stated that in the case generators having connectivity EHV, MSEDCL will not going to issue GCN. In response to this SLDC stated that as per existing procedure and Govt guidelines as per annexure "G" of Hon'ble Maharashtra Ministry of Power Circular No. "शासन निर्णय क्रमांक: अपाऊ-2020/प्र.क्र.137 (अ)/ऊर्जा-7" dated 11.05.2022 wherein MSEDCL/Developer has been entrusted the responsibility of issuance the Generator Credit Note (GCN). In view of this, host distribution licensee (generator located under respective discom's area) shall issue the credit note to the generator irrespective of its connectivity. In case developer is issuing the GCN then respective host distribution licensee should certify that GCN.

Observation and recommendation:

- (i) All the participants of the meeting are in view that till the development of software integration work of STU/MSLDC software with GOAR portal, OA consumers having PPA with Renewable/Non-Renewable generator can apply to OA portal developed by STU available on Mahatransco website for availing LTOA/MTOA and for availing STOA, consumers can apply to SLDC existing OA Portal.
- (ii) MSEDCL will prepare draft of Annexure containing summary/short details of PPA and circulate it with all the participants for comments. After finalization of Annexure, it will be attached as annexure with interim procedure.
- (iii) MSLDC will prepare interim procedure for grant of STOA and STU will prepare interim procedure for LTOA/MTOA.

Agenda No. 2:

Implementation of Hon'ble APTEL Judgement dated 05th July 2024 in Appeal No.95 of 2024.

Regulatory provision: MERC TOA/DOA Regulations 2016.

Discussion:

STU states that, Hon'ble APTEL vide its order dated 05th July 2024 in Appeal No.95 of 2024 has set aside the Hon'ble MERC order dated 07th November 2023 in Case no.95 of 2023. The relevant ruling of Hon'ble APTEL order is as follows:

"22. In view of the aforesaid observations and findings, we, feel it appropriate to set aside the Impugned Order to the extent of calculation of Base TCR for the Appellant and remand the matter to Respondent No.1, MERC directing it to Calculate the base TCR afresh for Control period under consideration in the light of the observations recorded in the foregoing paragraphs."

SLDC states that, it is difficult to exclude the demand of POA consumers from the concerned distribution licensee. As the POA consumers are embedded in the distribution licensee area and Meter data of identified interface locations with Distribution Licensee is only available in DSM Module and separate meter data of POA consumers is not available in DSM Billing Module.



MSEDCL states that, they have 15 minutes time block demand data and they will provide it to SLDC for further calculations.

AEML-D and TPC-D states that they don't have 15 minutes time block demand data, hence they cannot provide the required data to SLDC for exclusion of POA demand from their CPD and NCPD demand.

In response to MSEDCL, SLDC requested MSEDCL to provide their data for further calculations.

The meeting was concluded with vote of thanks.

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  MAHATRANSCO Maharashtra State Electricity Transmission Co. Ltd.	<p>MAHARASHTRA STATE ELECTRICITY TRANSMISSION CO. LTD.</p> <p>CIN: U40109MH2005SGC153646</p> <p>Office of the Chief Engineer (STU)</p> <p>Address: 'Prakashganga', MSETCL, Plot no. C-19, E-Block, BKC, Bandra (E), Mumbai-400051</p> <p>Website: www.mahatransco.in</p> <p>Email Id: cestu@mahatransco.in Contact no: (O) 022-2659 5176</p>
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MSETCL/CO/STU-R&C/

No - 4096

Date: 6 MAY 2025

To,
The Secretary,
Maharashtra Electricity Regulatory Commission,
13th floor, Centre No.1, World Trade Centre,
Cuffe parade, Colaba,
Mumbai- 400005

Sub: Revised Minutes of 8th Distribution Open Access Monitoring & Review Committee meeting
held on 29.01.2025, 10.02.2025 & 20.02.2025
----Amendment in Point No.6 thereof.

Ref: MSETCL/CO/STU-R&C/ 2001 dtd 13.03.2025.

Dear Sirs,

With reference to the above subject, this office had issued MOM of 8th Distribution Open Access Monitoring & Review Committee meeting held on 29.01.2025 (Part-I), 10.02.2025 (Part-II) & 20.02.2025(Part-III) vide letter under reference. For more clarity, point no.6 of Part-III meeting held on 20.02.2025 is amended and the same is revised.

Revised Minutes of 8th Distribution Open Access Monitoring & Review Committee meeting is enclosed herewith.

Thanking you.

Encl: As above

Yours Faithfully,


(Poojush Sharma)
Chief Engineer (STU)

Sub: Minutes of 8th Distribution Open Access Monitoring & Review Committee meeting held on 29.01.2025, 10.02.2025 & 20.02.2025.

To,

- 1) The Director (Electrical Engineering),
MERC,13th Floor, Centre No.1, World Trade Centre, Cuffe Parade,
Colaba, Mumbai-400 005.
Email id: prafulla.varhade@merc.gov.in
- 2) The Deputy Director (Technical),
MERC,13th Floor, Centre No.1, World Trade Centre, Cuffe Parade,
Colaba, Mumbai-400 005.
Email id: popat.khandare@merc.gov.in
- 3) The Chief Engineer,
Maharashtra State Load Dispatch Centre,
Kalwa, Thane-Belapur Road, Airoli Navi- Mumbai-400 708.
Email id: cesldc@mahatransco.in
- 4) The Chief Engineer(Commercial),
Maharashtra State Electricity Distribution Co. Ltd,
5th floor Prakashgad, Plot No.G-19, Anant Kanekar Marg,
Bandra (East), Mumbai-400 051.
Email id: cecomm@mahadiscom.in , cecommho@mahadiscom.in
- 5) Assistant Vice President,
Adani Electricity Mumbai Ltd (Distribution Business),
CTS 407/A, (New), 408 (old) village,
7th floor, Eksar Devi Das lane,
Off SVP road, Borivali (west), Mumbai 400 103.
Email id: abaji.naralkar@adani.com
- 6) Group head Regulatory,
M/s. Tata Power Co. Ltd,
Backbay receiving Station, 148, Lt. Gen. J. Bhonsale Marg,
Nariman Point, Mumbai-400021.
Email id: hawwa@tatapower.com
- 7) The Deputy Chief Engineer (Power),
BEST,
1st Floor Multistoried Annexe Building, BEST Marg,
Colaba, Mumbai-400 001.
Email id: derc@bestundertaking.com

Sub: Minutes of 8th Distribution Open Access Monitoring & Review Committee meeting held on 29.01.2025, 10.02.2025 & 20.02.2025.

Minutes of meeting Part-I of 8th Distribution Open Access Monitoring & Review Committee held on dt. 29.01.2025 through VC.

Following members have attended the meeting:

Members	Designation and Organization
Shri Shashank Jewalikar	Executive Director, MSLDC
Shri. Peeyush Sharma	CE, STU
Shri. Girish Pantoji	CE(I/C), MSLDC
Shri Popat Khandare	Director (Tech), MERC
Shri. Pravin Y. Ganvir	Deputy Director (Tech), MERC
Smt Sharda Takpere	SE, STU-R&C
Shri. Vinay Singh	SE, Commercial, MSEDCL
Smt Hawwa Inamdar	Group head Regulatory, TPC-D
Shri Sanket Darekar	- TPC-D
Shri Digant Nayak	AEML-D
Shri. Nishant Godha	General Manager , ABT Cell, AEML-D
Shri. Ranjeet Sarvardekar	Head ABT Cell, AEML-D

STU welcomed all the Open Access Monitoring Committee Members and representatives of Distribution Licensees, BEST representative was not present in the VC meeting.

Agenda No. 1:

Finalisation of draft SOP for certification of Energy Injection Report for Renewable Generators in Maharashtra

The issuance of GCN/certification for power injected into the grid by distribution licensee particularly for EHV connected Open Access consumers and generators was discussed during the 6th distribution Open Access Monitoring & Review Committee meeting on 08.08.2024.

It was concluded that MSLDC to prepare a Standard Operating Procedure (SOP) for certifying the Energy Injection Report for Renewable Generators in Maharashtra. MSLDC has prepared and forwarded this draft procedure for comments/suggestions of Distribution Licensee(s) of the state on dated 18.10.2024.

However MSLDC has not received any feedback/comments from the distribution licensee. In view of above, MSLDC submits the draft procedure for the finalization, after dissuasion in DOA review committee. The final SOP shall be submitted to the Hon'ble MERC for approval. The draft SOP is attached for reference.

Regulatory provision:

1. MERC (DOA) (First Amendment) Regulation, Amendment in Regulation 16 of the Principal Regulations states that,
"16.3 Scheduling of renewable Energy generating plants identified as 'non-firm power' under the Commission's Regulations governing Renewable Energy Tariff shall be governed as per provisions of Maharashtra Electricity Regulatory Commission (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulations, 2018."
2. MERC Approved RE F&S Procedure (2nd Amendment) dated 15.01.2025.

Committee Discussion:

- MSLDC stated that they have not received any comments/suggestions on above draft SOP and therefore once again requested to share their views and comments on above issue.
- MSEDCL stated that, as per MERC Approved RE F&S Procedure (2nd Amendment) dated 15.01.2025, Regulation 5.6: The QCA shall be appointed by the Generators for the purposes specified in these Regulations.
- MSEDCL stated, as per regulation required 15 min time block data is available from QCA.
- QCA will provide the meter data and generator data while GCN from MSEDCL is not required.
- TPC-D stated that meter data submitted by QCA is not certified or authenticated.
- MSLDC stated that QCA is appointed only for scheduling, further stated that the generators are connected to different Distribution licensees and the meters are connected in group at interface feeder and the data retrieved will be for group meter, bifurcation of individual meter is difficult.
- MERC stated that since meters are fixed by MSEDCL, it is MSEDCL's responsibility to collect the data.
- MSEDCL suggested that the responsibility to be given to respective QCAs.
- MSEDCL stated that they themselves collect data from QCA and billing is done as per the data submitted by them, and the data submitted by QCA cannot be tampered or modified and further suggested that responsibility to be given to respective QCAs.
- TPC-D and AEML-D suggested that QCA is appointed by developer and cannot be verified or authenticated. Further, the data submitted by QCA and by scheduling (MSLDC) should not have any deviation. They also suggested that the same data should be approved by any competent authority.
- AEML-D questioned that if there is bifurcation in consumer through one generator, how can they get data for individual consumer.

Sub: Minutes of 8th Distribution Open Access Monitoring & Review Committee meeting held on 29.01.2025, 10.02.2025 & 20.02.2025.

- MSEDCL suggested that as per MERC order dated 19.09.2024 in case no. 12 of 2023 of Morris Energy Ltd, in case of group meter, Hon'ble commission has directed to adjust injection on proportionate basis.
- Further explained that individual meter to be provided to each generator for Open access and MSEDCL has created an online portal where data is filled by developer on percentage prorata basis. Such data is to be collected from developer and QCA.
- MSEDCL requested other Distribution licensees to implement and take data as per 15 min Time block data following regulation.
- MSLDC opined that the data can be collected from respective QCAs and if developer can provide the same data to other Distribution licensees as MSEDCL then other Distribution licensees may follow the same and the same may be decided by respective Distribution licensees.
- If other Distribution licensee wants time to develop same mechanism as MSEDCL, an interim arrangement to be suggested.

Committee Observation and recommendation:

- (i) Further to resolve this, MSLDC and MERC directed to submit the write up and comments by all Distribution licensees within a weeks' time with all their difficulties, pros and cons on above matter and MSEDCL to submit their current methodology and practice they follow and submit the same at the earliest.

Agenda No. 2:

There are about 1900 generators with different units in different PSS in the State. In accordance with the provisions of the MERC RE F&S Procedure dated 15.01.2025, MSLDC is collecting details of PPA & Open Access data from all the Distribution licensees & STU for scheduling activities. This activity is carried out on monthly basis. It is observed that some of the utilities are providing the open access information for the RE generators which are not commissioned. There are total 1300 No. of such transactions under STOA scheduled for the month of January-2025. Considering large quantum of RE transactions, it is not possible to verify each time to confirm whether generator is commissioned or not before enabling scheduling activities. This may lead to erroneous scheduling of such non-commissioned capacity. Further, if such generator is not commissioned, then, there will erroneous billing at Distribution Licensees side as well.

Regulatory provision:

MERC Approved RE F&S Procedure (2nd Amendment) dated 15.01.2025

Committee discussion:

AEML submission:

Stated that Open access is not granted if generator is not commissioned. However, sometimes generator assures that they will commission within time before start of Open access.

Committee Observation and recommendation:

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MSLDC requested to not submit such data. Further, recommended that in case a generator is commissioned after 27th of that month, Distribution licensees may submit the data for that particular generator later separately.

Agenda No. 3:

There is delay in giving consent by MSEDCL to OA consumer in case of LTOA/MTOA. As per the directives issued by Hon'ble MERC, MSLDC prepares a Common Registry having all the commercial details of each Wind & Solar Generator in the State. Further, as per the MERC RE F&S Procedure dated 19.12.2019 and its amendment dated 15.01.2025, all the Distribution licensees & STU are mandated to submit RE contract details to MSLDC by 27th day of each month by updating Common Registry for scheduling. Due to delay in receiving consent there is delay in granting open access to the consumers. Further, the consumers are requesting STU to grant open access for Backdated period.

Regulatory provision:

i. MERC Approved RE F&S Procedure (2nd Amendment) dated 15.01.2025

Committee discussion: STU requested MSEDCL to submit the consent on time. If delayed open access is granted by MSEDCL & STU, MSLDC may reject the applications.

Committee Observation and recommendation:

MERC and STU recommended to take action time in bound manner.

Conclusion: MSLDC and MERC directed to submit the write up and comments by all Distribution licensees within a weeks' time and arrange next meeting on 10.02.2025 to discuss on the comments submitted by Distribution Licensees.

The meeting was concluded with vote of thanks.

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Sub: Minutes of 8th Distribution Open Access Monitoring & Review Committee meeting held on 29.01.2025, 10.02.2025 & 20.02.2025.

Minutes of meeting Part-II of 8th Distribution Open Access Monitoring & Review Committee held on dt. 10.02.2025 through VC.

STU welcomed all the Open Access Monitoring Committee Members and representatives of Distribution Licensees.

Background:

MSLDC had prepared and forwarded the draft SOP for certification of Energy Injection Report for Renewable Generators in Maharashtra. CE (STU) and MSEDCL summarized the earlier meeting regarding the issuance of GCN/certification for power injected into the grid by distribution licensee particularly for EHV connected Open Access consumers and generators. Further it was directed to submit the write up and suggestions by all Distribution licensees. MSEDCL submitted their comments on 30.01.2025, STU requested TPC-D and AEML-D to submit their comments on the above matter. AEML-D and TPC-D submitted their comments on 06.02.2025 & 07.02.2025 respectively. The same is enclosed herewith. Accordingly the discussion was done as follows:

TPC-D submission and discussion:

- The Credit Notes were provided by MSEDCL in the past and requested that this practice should continue in the interest of the development of Renewable projects and generation in state.
- However, MSEDCL may charge a fee under the head “Schedule of Charges” for providing this service of taking the reading, checking the same and eventually releasing the Credit Note for the consumer or generator. Further such charges should be reasonable, but the same needs to be approved by the Hon’ble Commission
- TPC-D proposed that they prefer credit notes over QCA as it will be a challenge for the Distribution Licensee to deal with so many QCAs on monthly basis. This is in contrast to the Credit Notes which are issued by one Authority viz MSEDCL.

AEML-D submission and discussion:

- Till the establishment of specific procedures and the operationalization of the QCA's contract wise data submission as mandated under Regulation 11.4, the prevailing practice for providing Open Access credit by MSEDCL may continue as an interim measure. A clear timeline should be defined for transitioning from interim measures to the regulated framework for transaction wise actual generation data submission by QCA.

MSEDCL submission and discussion:

- MSEDCL stated that issuance of credit note is not as per any Regulation, as such MSEDCL shall not issue the same, however they will recover charges through issuance of demand note instead of credit notes.
- As per RE F&S regulation and procedure, they should be billed on 15 minute time block for Open access consumer instead of credit note.
- Meter data can be provided by developer for energy to be billed for Open access.
- Since MSEDCL is no more the nodal agency for RE connection.
- MSEDCL's explained their current methodology and mechanism for billing such that, for HV level, developer along with MSEDCL officials according to individual breakup of generator turbine and percentage sharing enters feeder meter data into MSEDCL system at circle level.
- MSEDCL suggested that to implement the same in other Distribution licensees, MSEDCL will share the raw file with respective Distribution licensees to avoid deviation in generation units and open access units. However data will be self -certified by each Distribution licensee.
- MSEDCL will also share the percentage sharing of data as per distribution licensees for 33kV connected generators.
- MSEDCL suggested that QCA has data for EHV level connected generators and QCA may provide the data to other Distribution licensees as well.
- MSEDCL suggested that other Distribution licensees may visit MSEDCL's office and they may help out other Distribution licensees to resolve and discuss other issues on data conversion, and meter data sharing.

STU:

- The data submitted by developer to MSEDCL's portal is not certified, the data submitted should be self-certified by each Distribution licensees in the interim methodology.

MSLDC:

- Currently QCA are not providing the data, developer is providing data in MSEDCL portal for billing & data submitted is not certified.
- MSEDCL may share the raw data with other Distribution licensees for HV level which are connected to MSEDCL.
- The implementation of SLDC web based system may take time, therefore an interim arrangement is to be made till then for provision of meter data.

Conclusion: It was concluded that distribution licensees will schedule a meeting together and decide on various factors of sharing of meter data, format conversion etc for the interim arrangement.

Sub: Minutes of 8th Distribution Open Access Monitoring & Review Committee meeting held on 29.01.2025, 10.02.2025 & 20.02.2025.

The meeting was concluded with vote of thanks.

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As per the discussion and conclusion in earlier meeting held on 10.02.2025, a meeting was conducted on 14.02.2025 between MSEDCL, AEML-D and TPC-D for discussing the issues on providing meter data of generators & other data modalities, MOM of the same is enclosed herewith.

As per the MOM dated 14.02.2025, it was decided to invite QCAs in next meeting which was scheduled on 20.02.2025 for further discussion. As discussed in the meeting held on 14 Feb 2025, MSEDCL should share details of Meter replacement with Distribution Licensees.

Minutes of meeting of 8th Distribution Open Access Monitoring & Review Committee Part-III held on dt. 20.02.2025 with QCAs through VC.

Following members have attended the meeting:

Members	Designation and Organization
Shri Shashank Jewalikar	Executive Director, MSLDC
Shri. Peeyush Sharma	CE, STU
Shri. Girish Pantoji	CE(I/C), MSLDC
Shri Popat Khandare	Director (Tech), MERC
Shri. Pravin Y. Ganvir	Deputy Director (Tech), MERC
Smt Sharda Takpere	SE, STU-R&C
Shri. Vinay Singh	SE, Commercial, M/s. MSEDCL
Smt Hawwa Inamdar	Group head Regulatory, TPC-D
Shri Digant Nayak	M/s. AEML-D
Shri. Ranjeet Sarvardekar	Head ABT Cell, M/s. AEML-D
Dhiren	M/s. Avaada (QCA)
Neel Paul	QCA
Shri Ujjwal Surana	M/s. Avaada (QCA)

Sub: Minutes of 8th Distribution Open Access Monitoring & Review Committee meeting held on 29.01.2025, 10.02.2025 & 20.02.2025.

Smt. Bhagyashree Mane	M/s. Vedanjay Power (QCA)
Shri. Sandeep Sahu	M/s. Manikaran (QCA)

STU welcomed all the Open Access Monitoring Committee Members, representatives of Distribution Licensees and QCAs from distribution licensees.

CE (STU) and MSEDCL summarized the earlier meeting regarding the challenges and responsibilities related to data sharing for energy accounting among utilities. Further it was decided to discuss and resolve the issue related with QCA.

Background: As per the MOM, held on 14.02.2025 with MSEDCL, AEML-D, TPC-D, it was decided as follows:

- QCA to provide 15 Minutes transaction wise meter data of generators connected to MSEDCL 33kV S/s to MSLDC and Distribution licensee in excel format till MSLDC web based system is made live.
- Data provided by QCA will be directly taken by Distribution licensee for billing purposes.
- QCA to provide 15 Minutes transaction wise meter data of generators connected to EHV S/s.
- All distribution licenses agreed that it is QCA's responsibility to provide schedule based and actual data in Excel format.

Discussion with QCAs:

1. Responsibilities of QCA:

Discussion: As per the Regulation RE F&S Regulation, QCAs to provide 15 Minutes contract/ transaction wise , meter data of generators connected to HV & EHV level S/s to MSLDC, Distribution licensees till MSLDC web based system is made live.

2. Details for Meter Reading :

Discussion: MSEDCL and other Distribution licensees will share the list of contracts and all the contract information, generator data and PSS information to QCAs for Joint meter Reading whose data is required for billing purposes. How TPCD will receive data of generators with Net installed capacity below 5MW (As these Generators are not covered under the ambit of RE F&S regulations).

3. Joint Meter reading by QCA & Distribution licensees and data sharing:

Discussion:

- The meter data will be taken by QCA in presence of MSEDCL representative who will also guide and assist QCAs for meter reading. The sealed installed meters are

unsealed by MSEDCL officials for downloading of meter data and again sealed by MSEDCL officials.

- The seal for EHV level meters will be unsealed by STU/MSETCL officials.
- The data will be shared in encrypted format (or Excel if Possible) by QCA. Since the MSEDCL official is available, the data will be shared with MSEDCL, however QCA needs to share the respective data to other respective Distribution Licensees.
- QCA will collect the meter data and submit the data in raw & excel format to Distribution licensees with name of PSS, information of contract and details as required by Distribution licensees.

4. Percentage allocation :

Discussion: In case generator is in contract with multiple Distribution licensees, the generator and QCA to communicate with each other and QCA will submit contract wise generation data to Distribution licensee as per percentage allocation. A procedure to be made for percentage allocation by QCA.

5. Data Format:

Discussion: Each Distribution licensees and QCAs should have Software for conversion of raw file into Excel format. QCA/MSEDCL will provide the details of the software required for distribution licensees to convert raw meter reading data into Excel format. QCAs shall submit data in Excel format (15 Minutes Data & Summary Data) along with the raw data to the Distribution licensees & Generator so as to audit and verify it. Format for sharing the data to be fixed. This shall include PSS name, Generation capacity connected to PSS, Type of RE (Solar/Wind), Commissioning date of RE plant, Voltage level at which PSS is connected to grid, Multiplying factor of meters, consumer number wise capacity of RE power availed by consumers of TPC-D/AEML-D through that PSS. Once the QCA gives contract-wise breakup, Distribution licensees should give the commercial settlement/ Energy adjustment to the respective beneficiaries/consumers of the generators whom QCAs are representing. QCA to share the make of meters and meter data conversion software's to TPC-D/AEML-D to enable them for conversion of raw data into usable form. Support to be extended by MSEDCL till receipt of meter data conversion software. , In case of any revision in the data shared earlier, QCA should share the revised details to all the Discoms with CC to MSLDC, STU through one common mail.

6. Implementation and Conclusion:

1. **For Generators of other distribution Licensees at EHV Level:** QCA will provide all pending meter data from August 2024 onwards to other distribution licensees. MSETCL staff will seal & unseal the interface meters while assisting the meter reading and collecting data along with QCA.
2. **For Generators of other distribution Licensees at HV Level:** MSEDCL will provide GCN for month of February and March 2025. The interim procedure will be implemented from 1st April 2025 onwards where QCA will provide meter data to other distribution licensees for HV level as well. MSEDCL staff will seal & unseal the meters while assist the meter reading and collecting data along with QCA.
3. Further, it was decided that AEML-D and TPC-D will develop the software for conversion of raw formats to excel formats by 1st April 2025. The Contact details (Email ID and mobile number) of each QCA to be shared with Distribution Licensee.

The meeting was concluded with vote of thanks.

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Minutes of Meeting Dt. 14.02.2025

Sub Matter: - Discussion on providing Meter Data of Generators to DISCOM's.

Ref: - VC on 8th Open Access Committee Meeting Dated 10.02.2025 (MON)

Date: - 14.02.2025 (FRI) 11:00Hrs, 5th Floor Commercial Section, Prakashgad.

Officers Present from other DISCOM

1. Mr. Ranjeet Savardekar	-	Head ABT	-	ADANI
2. Mr. Nishant Godha	-	Lead Open Access	-	ADANI
3. Mr. Utkarsha H. Kachare	-	Team Lead Billing	-	Tata Power
4. Mr. Mihir Kulkarni	-	Lead Engg. (Comm)	-	Tata Power
5. Miss. Hawwa Inamdar	-	Group Head	-	Tata Power
6. Mr. Dipali Dhumal	-	Lead Associates(Billing	-	Tata Power

Officers Present from MSEDCL

1. Mr. Vinay S. Singh (Superintending Engineer, Commercial)
2. Miss. Susan Advent (Add. Executive Engineer, Commercial)
3. Mr. Arvind L. Mahakalkar (Dy. Executive Engineer, Commercial)

With reference to the 8th Open Access Committee Meeting Dated 10.02.2025 (MON), a meeting was arranged for DISCOM's for discussion on providing meter data of Generator's at Commercial Section at Prakashgad, 5th Floor, Anant Kanekar Marg, Mumbai on 14.02.2025 @ 11:00 Hrs. Representatives from ADANI, Tata Power and MSEDCL agreed on following points: -

For Generator's connected at 33 KV S/S of MSEDCL

- Based on provisions of RE F&S Regulation, QCA to provide the 15 Minutes Transactions wise meter data of generator's connected to MSEDCL 33 KV S/S to MSLDC and DISCOM in excel format till SLDC Web Based System is made live. Detail Procedure and Formats for transaction wise Data submission by QCA to Discom can be finalized through discussion with all stakeholders. Data provided by QCA will be directly taken by Discom for Billing purposes. This will ensure data uniformity for DSM billing also.
- List of the Meter data provided shall be given mentioning the Generator Name & Turbine Location, Meter Serial No., Voltage, Multiplying factor etc.
- MSEDCL will share the list of contracts which are availing power from this generator which shall be confirmed by QCA.
- QCA will also inform about the Meter Change, in case of change in credit to be passed on to OA consumers,, Shut Down/Maintenance period if any for this generator during the month to the Distribution Licensees where Generator is embedded and where beneficiary is located & MSLDC.

For Generator's connected at EHV S/s

- QCA to provide 15 Minutes Transactions wise meter data of generator's connected to EHV S/S .
- List of the Meter data provided shall be given mentioning the Generator Name & Turbine Location, Meter Serial No., Voltage, Multiplying factor etc.

- (15)
- QCA will share the list of consumers which are availing power from this generator.
 - QCA will also inform about the Meter Change, in case of change in credit to be passed on to OA consumers, Shut Down/Maintenance period if any for this generator during the month to the Distribution Licensees where Generator is embedded and where beneficiary is located & MSLDC.
 - QCA shall be invited for the meeting scheduled on 17.02.2025.