

Before

UTTARAKHAND ELECTRICITY REGULATORY COMMISSION

Petition No.: 12 of 2020 (Suo-Motu)

In the matter of:

Deployment of customised Renewable Purchase Obligation Compliance System (RPOCS) Web Tool in Uttarakhand.

CORAM

Shri D.P. Gairola Member (Law)

Shri M.K. Jain Member (Technical)

Date of Order: June 19, 2020

This Order relates to the selection of Verification Agencies and their duties/functions to validate the information uploaded by the Obligated Entities on the Renewable Purchase Obligation Compliance System (RPOCS webtool).

1. Background

1.1 The Commission vide its Suo-moto Order dated 14.12.2018 defined the roles of different stakeholders of RPOCS webtool and assigned the functions/duties of the Verifying Agencies to verify the information uploaded by the Obligated entities on the RPOCS webtool alongwith the duties/functions of Implementation Agency and Obligated Entities. The Commission vide the said Order had appointed UPCL as Verifying Agency to assure legitimacy of the information uploaded on the webtool by Captive Users in the State of Uttarakhand as it has access to such consumers for their meter reading. Further, SLDC was assigned the duty to validate the information uploaded by distribution licensee, i.e. UPCL, and Open Access Consumers.

1.2 Subsequently, a meeting was conducted by UREDA on 22.01.2018 wherein UPCL accepted to become Verifying Agency for validation of information uploaded by the Open Access Consumers in the RPOCS webtool and expressed its inability to validate the data uploaded by the Captive Users as they have no authenticated source for validating the energy

consumption of the Captive User.

- 1.3 Further, during the process of development of the RPOCS webtool, the Commission sought comments from UPCL on the Beta version of RPOCS webtool prepared by M/s Idam Infrastructure Advisory Pvt. Ltd. In reply, UPCL vide its letter dated 23.05.2020 submitted that UREDA should be the Verifying Agency of the Captive Users and SLDC should verify the information uploaded by Open Access Consumers in the RPOCS webtool.

2. Commission's view and decision

- 2.1 The Commission conducted an online demonstration of customised RPOCS webtool developed by M/s Idam Infrastructure Advisory Pvt. Ltd. on 08.06.2020 wherein the Commission expressed its concern regarding ambiguity arising from the submissions of UPCL during the meeting held on 22.01.2018 at UREDA's office and letter dated 23.05.2020 regarding Verifying Agencies. Accordingly, the Commission convened a meeting with the officials of UPCL, SLDC and UREDA on 12.06.2020 at the Commissions' office to finalise the matter of Verifying Agency to authenticate the information uploaded by the Obligated Entities on the RPOCS webtool.
- 2.2 With regard to the Verifying Agency for the information uploaded by Captive Users, the Commission had assigned the duty to UPCL to verify the information uploaded by Captive Users in the State of Uttarakhand. However, during the meeting held on 12.06.2020, UPCL expressed its inability to verify the same as there are many Captive Users in the State of Uttarakhand and it does not have authenticated data for validation. In the matter, the Commission is of the view that all the captive consumers are grid connected and the energy supplied to such consumers is being billed by UPCL, it will be easier for UPCL to collect relevant information from such users to verify the information uploaded on the RPOCS webtool. Accordingly, UPCL may issue proper directions to its concerned officers and specify the procedures to collect the relevant information for verification purpose. Further, taking cognizance of the fact that there are numerous Captive Users in the State of Uttarakhand and it will be a tedious job for UPCL to collect and verify the data of each and every Captive user, the Commission in exercise of powers conferred under Regulation 51 of UERC (Tariff & Other Terms for Supply of Electricity from Renewable Energy Sources and non-fossil fuel based Co-generating Stations) Regulations, 2018 that

RPO shall be applicable on all captive users having contracted load of 75 kW/88 kVA and above. Accordingly, UPCL shall verify the information uploaded by the Captive Users on the RPOCS webtool having contracted load of 75 kW/88 kVA and above.

2.3 With respect to the Verifying Agency for the information uploaded by Open Access Consumers, the Commission had assigned the duty on SLDC to verify the information uploaded by Open Access Consumers on the RPOCS webtool. However, during the meeting held on 12.06.2020, SLDC submitted that it relies on power exchange data whereas UPCL has more information for validation purpose as compared to the SLDC. In the matter, the Commission is of the view that based on the information required for verification and validation of the information uploaded by the Open Access Consumers, SLDC and UPCL may form a procedure mutually for sharing of information/documents so that SLDC can validate the information uploaded by Open Access Consumers on the RPOCS webtool. Accordingly, SLDC shall verify the information uploaded by Open Access consumers on the RPOCS webtool.

2.4 Further, the Commission would like to reiterate the direction issued vide its Suo-moto Order dated 14.12.2018 that the respective Verifying Agency shall verify and validate the source of energy consumed, Contracts of Obligated Entities for procurement of energy, quantum of energy consumed and other documentary proof as and when uploaded by the Obligated Entities.

2.5 Further, with regard to the time frame, i.e. within 15 days on completion of the month, specified for Obligated Entities to upload the consumption details alongwith supporting documents, UPCL during the meeting dated 22.01.2019 held at UREDA's office requested the Commission to provide atleast 45 days for uploading monthly consumption details on the RPOCS webtool as it can be done only after receipt of bills of energy supplied to UPCL by various generators and Regional Energy Accounts from NRPC. Similarly, billing and accounting of the energy consumption data of Open Access Consumers also takes 45 days. Further, UPCL also requested the Commission that 15 days time be allowed for verification of data after uploading the same by the obligated entities.

In the matter, it is pertinent to mention that providing the time period of 60 days (45+15) for uploading and verification of the information shall defeat one of the purposes of development of the RPOCS webtool, i.e. availability of information for the Commission

and other Government Agencies within stipulated time frame as the validated information for a particular month will be available after completion of following two months.

However, it cannot be denied that SLDC and UPCL shall be required to collect information from the Open Access Consumers and Captive Users for validation of information. Therefore, the Commission is of the view to allow Verifying Agencies to validate the information uploaded by the Obligated Agencies within 15 days of submission of data.

Further, as far as UPCL's request to provide 45 days for uploading the information by Obligated Entities, the Commission partially accepts the request and allows the timeframe of 30 days to Obligated Entities to upload the information based on the available bills. Accordingly, the Obligated Entities shall upload the consumption details alongwith supporting documents for the month by the 30th of the following month.

3. In view of the above, Implementing Agency, Verifying Agencies and Obligated Entities are advised to ensure compliance of the same. Further, as discussed above all the verifying agencies are directed to prepare the procedures/information requirement required for validation of the information within 30 days of the date of the Order and submit the same to the Commission for information.

Ordered accordingly.

(M.K. Jain)
Member (Technical)

(D.P. Gairola)
Member (Law)