

March 2021

SUBMISSION ON DRAFT RERC (METERING) PRACTICE DIRECTIONS 2021

Submitted to Rajasthan Electricity Regulatory Commission

Rajasthan Electricity Regulatory Commission (RERC) has repealed 'RERC (metering) Regulations 2007' to avoid conflict with the 'Central Electricity Authority (Installation and Operation of meters) Regulations, 2006'. Post repeal, all issues related to metering shall be guided by the CEA regulations. The CEA regulations have certain clauses where the state electricity regulatory commissions are supposed to issue directions. Therefore, draft RERC (metering) Practice Directions 2021 are issued, and suggestions are invited.

The present submission is in response to the draft practice directions published on the commission's website. We request the Commission to accept this submission on record.

GENERAL COMMENTS

- The CEA metering regulations are comprehensive regulations that cover all aspects of metering for consumers. However, there are certain provisions in the CEA regulations which are critical for consumers and witness frequent noncompliance. It would be prudent to include a few of the CEA regulations' provisions in the state's regulatory framework. This would lead to the incorporation of these provisions in TCOS/Guides issued by the licensee and wider dissemination within its employees and consumers. A few of these provisions are enlisted below:

- a. CEA Regulations Clause 7 (2) (a): The consumer meter shall be installed by the licensee either at the consumer premises or outside the consumer premises:

Provided that where the licensee installs the consumer meter outside the premises of the consumer then the licensee on a request from consumer shall provide real time display unit at the premises of the consumer for his information to indicate the electricity consumed by the consumer:

- b. CEA Regulations Clause 13
 1. The supplier or buyer in whose premises the interface meters are installed shall be responsible for their safety.
 2. The consumer shall, as far as circumstances permit, take precautions for the safety of the consumer meter installed in his premises belonging to the licensee.
 3. Licensee shall be responsible for the safety of the consumer meter located outside the premises of the consumer and the consumer shall be responsible for the safety of the real time display unit installed by the licensee in consumer premises.
- c. CEA Regulations Clause 18 (2) Consumer meters

The testing of consumer meters shall be done at site at least **once in five years**. The licensee may instead of testing the meter at site can remove the meter and replace

the same by a tested meter duly tested in an accredited test laboratory. In addition, meters installed in the circuit shall be tested if study of consumption pattern changes drastically from the similar months or season of the previous years or if there is consumer's complaint pertaining to a meter.

- As per CEA Regulations Clause 14 (2) (a) the Appropriate Regulatory Commission shall **specify a suitable time frame for ensuring electronic meter reading** of all consumer meters by the licensees. The commission has not set any time frame for ensuring electronic meter reading of all consumer meters in this order, and the same needs to be incorporated. We propose one year from the notification of these practice directions for the implementation of electronic reading of consumer meters.

SECTION-WISE COMMENTS

Section - A (1) (a) (ii) Location Of Interface Meters For OA Consumers

Our Comments

The commission has proposed that main, check, and standby meters shall be installed at the premises of the OA Consumers who do not have a dedicated feeder from the Sub-station of the Transmission/ Distribution licensee.

We submit that having all three meters inside the consumer's premises defeats the purpose of having three meters for redundancy, and therefore, the standby meter can be installed at another end of the service line, i.e., Pole or Distribution/Power Transformer.

Section - A (1) (a) (iii) Location Of Interface Meters For Mini Hydel Stations

Our Comments

The commission has proposed that main and check meters shall be provided at energy transfer points, preferably at the generating station outgoing feeders for mini hydel stations.

We submit that the location of meters shall be as per CEA regulations, i.e., Main meter and Check meter on all outgoing feeders and Standby meter on the HV side of transformers (Generator/Auxiliary).

Section - D (1) Quality Assurance Of Meters

Our Comments

It has been proposed that the licensee shall prepare a Quality Assurance plan/programme for meter, starting from receipt, storage in-house testing (if any), installation, periodic

testing lab and site testing procedure, removal/replacement, and disposal of meters, including selling practices and submit to the commission.

We propose to mandate the distribution licensee to submit the Quality Assurance plan/programme to the Commission for approval within three months of notification of this order and the same shall be made available on the licensee's website.

2. Review Of Practice Directions

Our Comments

The metering committee from the erstwhile 'Rajasthan Electricity Regulatory Commission (metering) Regulations 2007' has been retained for review of metering issues under the chairmanship of RVPN. It is submitted that the distribution licensees may be mandated to form subcommittees to monitor compliance of regulations pertaining to metering and make appropriate recommendations to the metering committee chaired by RVPN.