

**KERALA ELECTRICITY EMPLOYEES' CONFEDERATION
INTUC**



(Reg. No. 01-14/87 - Aff. 10485)

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No. KEEC/GL/2025/45

Thiruvananthapuram
16.07.2025

To

The Hon. Chairman
Kerala State Electricity Regulatory Commission
Vellayambalam
Thiruvananthapuram

Sir

Sub: Renewable Energy and related matters hearing note submitting reg.

Ref:

We encourage renewable energy and its implementation, it is for to meet our power requirements. Recently central government included hydro electricity also in the renewable energy group. There are many sources of hydroelectricity in Kerala. It is around 2500mw. It doesn't affect the environment. The Hon. Commission give more importance to hydroelectricity.

Solar energy is also another source of renewable energy. We have to utilize its maximum but it should not intrude the finance of State Electricity Board. The present rules and regulations in the solar power scheme causes loss around Rs.40 crores/month to KSEB. It is because of the wrong system of billing. The present method of billing adopted is net metering.

The solar prosumers has the full right to get the cost of power produced by them. Previously the cost of Electricity/unit was Rs.2.90 and now subsequently it is Rs.3.08. They have the right to get the above cost for the entire energy at the above rate. They have no other rights. The net metering method will allow them to use the energy at night, which was purchased by KSEB from power exchange at a cost of Rs.12 to 14. This is a huge loss to KSEB. This burden will Passover to the poor people in the state. During the last 9 years period, the electricity charge hiked three times. One of the main reason on the above is the system of billing, i.e. net metering. The total consumers of KSEB is 1.40 crores whereas the number of solar Prosumers is mere 2.05 lakhs. By giving illegal subsidy to minority 2.05 lakh Prosumers, the majority 1.40 crores power consumers/common people will suffer. If this method is continued, it will cause hurdle hardships to the poor people. The solar Prosumers shall be billed like any other consumer and the cost of power produced by the Prosumers to be released to them as per price agreed in the agreement. Passing any additional benefits to them will affect the finance of KSEB and through that, empty the packet of more than 98% common consumers. In this situation Hon.Commission may think about the prosumers, who can install solar on their house top, will not be poor or BPL. Minimum plinth area of their house will be 1000 sq.ft. The benefits of such people will become the burden of poor people. This is against Article 14 right to equality. This is against natural justice.

As per the norms and Electrical technical rules the solar plant capacity shall not excess more than half of the capacity of the transfer for a particular area. It is not maintained there may occur regular tripping, voltage fluctuation etc. It will convert the grid unstable. So we propose that the Hon. Commission may take action to keep the voltage stability between 240-252 V. now as per regulation it is 262 V.

It is not justifiable that-to allow all the existing prosumers to continue the present method net metering. The wrong decision of KSEB/Commission can correct any time. Now it is the time to make correction in the form of regulation. Encouragement of pumped storage vehicle to grid etc, can be considered without

more financial loss to KSEB. It is also requested that the commission may verify the status of Purappura Solar installed by KSEB from its own fund.

In this connection we, support the new regulation for changing the billing method and we propose,

1. Gross billing to Commercial/Industrial Prosumers
2. Net billing to domestic prosumers.

Thanking you,

Yours faithfully,



Sibykutty Francis
Working President
Kerala Electricity Employees
Confederation (INTUC)