

CONSUMER UNITY & TRUST SOCIETY

A registered, recognised, non-partisan, non-profit and non-government organisation
pursuing social justice and economic equity within and across borders.

CUTS
International

Value For People

S44/1358

Date:07/09/2012

Mr.K.P.Bhar
Secretary
West Bengal Electricity Regulatory Commission
Poura Bhawan
Salt Lake

Sub: Comments on WBERC Draft Regulation titled "Draft West Bengal Electricity Regulatory Commission (Cogeneration and Generation of Electricity from Renewable Sources of Energy) Regulations, 2012 (For replacing existing Regulation)"

Reference: Your Notice No. WBERC/Regulation/34/10-11/0647

Dear Mr.Bhar,

Greetings from CUTS International!!

In response to the notice mentioned above, we are enclosing our comments on the Draft Regulation for your kind consideration and inclusion.

We have also consulted our district based Civil Society partners and the comments being submitted also has inputs from the following organisations:

1. Magra Women Development Centre, Magra, Hooghly
2. Alinan Ramkrishna Vivekananda Yuba Sangha, Alinan, East Midnapore
3. Kajla Jana Kalyan Samity, Kajla, East Midnapore
4. Sreema Mahila Samity, Duttaphulia, Nadia
5. Chapra SEWA, Chapra, Nadia
6. Haldibari Welfare Organisation, Haldibari, Cooch Behar
7. Dakshin Ramchnadrapur Vivekananda Seva Kendra, Cooch Behar
8. Agragati, Amta, Howrah
9. Purulia District Agragami Mahila O Sishu Mangal Samiti, Jargo, Purulia
10. Chanchal Jana Kalyan Samity, Chanchal, Malda
11. Chak Kumar Association for Social Services, Chak Kumar, West Midnapore
12. Ramkrishna Lok Seva Kendra, Gosaba, South 24 Parganas
13. Baikunthapur Tarun Sangha, Kultali, South 24 Parganas
14. Debnibas Sindhubla Nari Kalyan Samity, Namkhana, South 24 Parganas
15. MUKTI, Raidighi, South 24 Parganas

We hope that our comments and concerns that reflect those of the grassroots consumers will be favourable considered for inclusion.

With kind regards

Keya Ghosh

Keya Ghosh, Ph.D
Director
CUTS Calcutta Resource Centre



CUTS INTERNATIONAL AND PARTNERS:

Comments on WBERC Draft Regulation titled “Draft West Bengal Electricity Regulatory Commission (Cogeneration and Generation of Electricity from Renewable Sources of Energy) Regulations, 2012 (For replacing existing Regulation)”

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1. There is a lack of clarity on the nature of power purchase agreement between the utility and smaller entities (viz. government institution, individual household) who have installed grid connected solar rooftops on a voluntary basis.
2. With respect to clause 6.1.v.b
 - a) Commercial Institutions (with total installed capacity greater than 4KW) and individual households (with a total installed capacity greater than or equal to 2KW) should also be allowed to set up grid connected rooftop solar PV. So the minimum total installed capacity for availing grid connected rooftop solar PV by households needs to be lowered.
 - b) In case of billing for consumers who will be using grid connected solar PV, net metering based on “**net energy use**” is not the right way. Instead billing should be done based on “**net energy charges**” payable/receivable for different sources of electricity.
3. With respect to clause 7.4 - Cost for developing communication system between the grid substation and the generating station has to be shared between the developer and the appropriate government.
4. With respect to clause 11.2 - Minimum charge payable by the open access customer may be a minimum of Rs.200/- or actual unit expense whichever is lower.