### Comments on the CII proposal for eliminating Load Shedding in Pune Urban Circles

#### Prayas Energy Group

Prayas Submission to MERC on CII proposal

# Load Shedding – Impact of MERC Order

- Present Load shedding
  - 1 or 2 hours per day (540 MWh) in Pune City
  - 6 to 8 hours per day in rural areas
- However, consumers of the same category in rural and urban area pay the same tariff
- Large no. of HT industries excluded from LS
- It is only because Pune is an urban area with better revenue, load shedding hours are minimum with no load shedding during evening peak

### CII Proposal

- Welcome initiative
  - Consumer initiative
  - Principle of higher cost for better service being considered

# CII proposal :Operational Issues

• Variable (Fuel) charge

Detailed cost audit is essential

- Reliability
  - Continuous availability of 90-100 MW should be ensured
- Administrative issues and costs
  - Appropriate metering arrangements
  - Setting up of a mini-Load Dispatch Centre

### Tariff Impact

CII proposal	MSEB Response
About 37 p/kWh	About 42 p/kWh

#### (For daily LS of 540 MWh)

- Some gaps in both calculations
  - Industries willing to pay such surcharge?
  - Should poor / small consumers pay such surcharge?
  - What will be costs of operationalisation and monitoring?
- Considering these factors, the real tariff hike would be about 60 p/kWh or 20 %!
- $\rightarrow$  A very high cost proposal

### Concerns

- Increasing urban rural and industrial non industrial differences
- Need to strike a balance between equity and economic efficiency
- Need to explore alternative approaches

### Alternative Approaches ...1

- Other possibilities of generation e.g. Converting Uran to liquid fuel
  - $1/6^{th}$  of the annual cost of this scheme (25 Cr)
  - Addition of 450 MW with much lower cost of generation
- Buying peaking power from a Trader
  CII could facilitate this transaction

## Alternative Approaches ...2

- Present Scheme = Incentivising load withdrawal at Rs 10.18/kWh
  - Why should other big consumers (malls, hoardings, multiplexes etc) be excluded ?
  - They could possibly be incentivised at a lower rate!
- Management of reliability may be dealt at the micro level
  - Those who cannot afford load shedding of even 0.5 1 hr, may switch to inverters / DG sets – why to force increased cost & reliability on all?

### Important issues that need urgent action

- Long term demand forecast
- Capacity addition plan and associated PPAs
- Reduction of T & D losses (e.g.zone-wise public hearing?)

### Prayers

- Need to revisit the load shedding protocol
- Need to reduce urban rural differences
- Current proposal very high cost and hence should not be considered for eliminating load shedding in Pune
- Initiate urgent action on important issues (e.g. demand forecast, capacity addition plan and PPAs)