

# BEFORE THE UTTAR PRADESH ELECTRICITY REGULATORY COMMISSION

Vidyut Niyamak Bhawan, Vibhuti Khand, Gomti Nagar, Lucknow-226010

## IN THE MATTER OF

**Comments and Suggestions on Determination of ARR and Tariff for FY 21 of the Control Period from FY21 to FY25, Annual Performance Review for FY 20 and True-up of FY 19 for Uttar Pradesh DISCOMs**

**ADDITIONAL SUBMISSION FROM PRAYAS (ENERGY GROUP), PUNE**

**16<sup>th</sup> October 2020**

DISCOMs in Uttar Pradesh filed petitions for true-up for FY 2018-19, annual performance review for FY 2019-20 and for determination of ARR and tariff for FY 2020-21 for the control period FY21 to FY25 before the UPERC in July, 2020. With reference to this, the Commission issued a public notice dated 07.08.2020 in the matter and virtual public hearings were held on 24.09.2020 and 28.09.2020.

Prayas (Energy Group) made a written submission with comments and suggestions and presented the same before the Commission on 28.09.2020.

During the public hearing, discussions were held regarding meterisation of various consumer categories and ensuring timely payments. We would like to make an additional submission regarding the said issue for the Commission's consideration.

As per UPPCL's "Statistics at a Glance-2018-19"<sup>1</sup> 54% of arrears are pending from government institutions such as public lighting, public waterworks, govt. tube well. The share of such arrears to total arrears was 51% in FY18<sup>2</sup> and the absolute quantum of arrears have grown by 18% in one year between FY18 and FY19.

Given this issue, the Commission can consider introducing "Virtual Net Metering" to the UPERC (Rooftop Solar PV Grid Interactive System Gross/Net Metering) Regulations, 2019 (RSPV Regulations, 2019). The introduction of the same in the regulations can promote virtual net metering mechanism such that captive consumers can obtain credits on their electricity bill for solar rooftop photo-voltaic systems that are installed off-site and shared among multiple users and thus circumvent the issue of limited rooftop space. Such a mechanism can help supply to public water works, government offices, departmental employees, urban and rural local bodies, public schools, and hospitals with power at fixed rates while aiding DISCOMs in meeting their RPO requirement. Additionally, this will also aide in improving collection efficiency of DISCOMs.

We hope this suggestion is considered by the UPERC.

Thanking You

Regards,  
Manabika Mandal  
Prayas (Energy Group)

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<sup>1</sup>UPPCL's "Statistics at a Glance-2018-19, pg. 138, table on "Category-wise Revenue Arrears : At the end of Year (2018-19)": <https://upenergy.in/site/writereaddata/siteContent/202006191615143301Statistics%20at%20a%20Glance%202018-19%20-19062020.pdf>

<sup>2</sup> UPPCL's "Statistics at a Glance-2017-18, pg. 112, table on "Category-wise Revenue Arrears : At the end of Year (2017-18)": <https://drive.google.com/file/d/1rAyGULxotAxXI0Y8jZHokfP9u0MFCvPK/view>