

CHAPTER – 3

PUBLIC CONSULTATION

SUGGESTIONS / OBJECTIONS & REPLIES

3.1 As per the provisions of Section 64 of the Electricity Act, 2003, the Commission has undertaken the process of public consultation, inviting suggestions / views / objections from the interested stakeholders and the general public on the application filed by KPTCL for Annual Performance Review (APR) for FY19, approval of revised ARR and re-determination of Transmission Tariff for FY21. In the written submissions filed as well as during the public hearing, the stakeholders and the public have raised several objections/ made suggestions, on the KPTCL's Tariff Application dated 27.11.2019. The names of the persons who filed written objections are given below:

3.2 List of Objectors who have filed written objections:

| Sl. No. | Application No. | Name & Address of Objectors |
|---------|-----------------|---|
| 1 | KA-01 | The Director Finance, BESCO, KR Circle, Bengaluru |
| 2 | KA-02 | The Superintending Engineer (Elec.), Commercial, MESCOM |

The Commission has also received objections from GESCOM on KPTCL's Petition for APR for FY19, approval of ARR and re-determination of transmission charges for FY21 after the due date.

The objections/suggestions mainly pertain to:

- a. Implementation of Intra State ABT;
- b. Transmission losses;
- c. Transmission system availability;
- d. O&M expenses; and
- e. Certain specific requests.

The summary of the objections, the KPTCL's reply and the Commission's view are annexed as Appendix-1, to this Order.

The Commission held a Public Hearing on 10.02.2020. During the Public hearing the MD, KPTCL made a brief presentation highlighting the status of implementation of the Commission's directives and the brief facts of submissions made by KPTCL in its Petition for APR of FY19, approval of ARR and re-determination of transmission tariff for FY21.

3.3 The following persons made oral submissions during the Public Hearing, held on 10.02.2020.

| Sl. No. | Name & Address of Objectors |
|---------|--|
| 1 | Shri. Mallappa Gowda, KASSIA |
| 2 | Shri. G.N. Krishnappa, Electrical Contractor |

The summary of the points raised during the Public Hearing are as follows:

- 1) The existing transmission losses as submitted by the KPTCL for FY19 are less than the loss target approved by the Commission. The transmission losses can further be reduced by completing pending works and charging the Stations on time.
- 2) Problems at 220kV Brindavan Station, Antharasanahalli, Byadarahalli are yet to be addressed.
- 3) Link line works between Machenahalli to Byadarahalli to reduce load shedding is pending due to RoW issues in Machenahalli Industrial area.
- 4) Infrastructure for additional load demand by the consumer should be provided by the KPTCL/ESCOMs.
- 5) Reduction in Time of the Day (ToD) hours to increase the industrial demand.
- 6) Mandur station works have been completed 10 years back but the station is not commissioned yet.

KPTCL's Response:

KPTCL in its reply to the objections, stated the following:

- 1) Testing of 220kV Brindavan Sub-Station (SS) near Peenya is going on and the SS is expected to get commissioned by March, 2020.

- 2) Contract for establishment of the link between Machenahalli to Byadarahalli has been awarded and the contract period is nine months.
- 3) KPTCL submitted that study needs to be conducted on case to case basis for provision of Infrastructure facility for additional load demand by the consumers.
- 4) The contractor has abandoned the completion works of Mandur Station resulting in delay in commissioning of the project. KPTCL has revived the project and the project is expected to get completed within six months.

That the other issues not covered earlier would be looked into and remedial action taken.

Commission's Views:

The Commission directed KPTCL to:

1. Look into the unresolved non-tariff issues and attend to them on priority.
2. Energy audit should be done properly by conducting joint meter reading by the KPTCL and ESCOMs.
3. Prudence check of projects with cost over-runs due to delay in completion of the project should be conducted. Further, effective contract management should be done to avoid cost over-runs, by periodically reviewing the work done by the contractors;
4. As regards quality of service, KPTCL should develop a software to conduct data analysis of the number and duration of outages.
5. Backing down of RE generation for want of evacuation facility needs to be analysed, monitored and addressed without further loss of time.
6. Inspection manuals should be followed for periodical maintenance of stations/transformers and the details should be posted on the website.
7. Duty registers should be properly maintained and updated by the employees to improve/monitor the efficiency.
8. Workshops on the Regulations issued by the Commission, should be conducted on a regular basis.