

DECEMBER 2021

**SUBMISSION ON CHANGES PROPOSED TO
CENTRAL ELECTRICITY AUTHORITY
(FURNISHING OF STATISTICS, RETURNS AND
INFORMATION) REGULATIONS, 2007**

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SUBMITTED TO

CENTRAL ELECTRICITY AUTHORITY


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The Central Electricity Authority (CEA) has invited comments/suggestions on changes proposed to Central Electricity Authority (Furnishing of Statistics, Returns and Information) Regulations, 2007. The present submission is in response to the notice published on CEA's website. We request the Authority to accept this submission on record.

GENERAL COMMENTS

It is hereby submitted that the proposed amendment provides for the deletion of formats that provide crucial information on coal linkage and receipts, generation loss due to fuel unavailability, fuel composition data, pump set energisation, rural household electrification, Power and Distribution Transformer failure, financial data for generation and transmission companies etc. which is not available elsewhere in such a detailed manner. The proposal does not accompany any Statement of Reasons or Explanatory Memorandum to provide a rationale behind the deletion of these formats or assess if this information shall be available through other agencies or in other reports by CEA.

The data captured through these formats constitute a very important repository to assess the performance and state of the infrastructure of the power sector. These data also constitute an important role in monitoring the country's socio-economic progress and form a vital input to the policymaking of energy and environmental issues. The availability of information ensures transparency and accountability of some magnitude in the sector. We would also like to highlight that the authority is the only institution empowered under Section 74 and Section 177 (2)(f) of the Electricity Act to collect data at the national level from all licensees.

Hence, we submit that the rationale for these proposed changes should be clearly stated and published again with a renewed deadline for public consultation through a separate notification. The SOR shall clearly state whether the authority intends to capture this data in other reports or through other agencies and mechanisms to address the sector's lack of reliable, consolidated data. We also request the authority to ensure timely reporting by the entities as mandated under these regulations. We further submit the authority shall take all measures to ensure public access to this crucial data necessary for monitoring and evaluating the efficiency and performance of the sector.

SECTION-WISE COMMENTS

The following table details our submission for the sections proposed for deletion:

Format No	Description of the format	Our Submission
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30	Daily data regarding loss of generation on account of shortage of coal, gas and un requisitioned liquid fired capacity	The daily loss of generation due to fuel shortage is an important parameter in assessing the impact of coal receipts less than coal linkages. The parameter assists the Generators in asserting their right under the fuel supply agreement and clarifies accountability. The data is not being collected or compiled at the national level by any other agency, and therefore it should be kept as it is.
39	Report of Monthly Average Ash percentage	<p>The third-party monitoring of the ash percentage by weight in the power plants forms an important input to audit the quality and cost of coal used. The fly ash of the combustion is also dependent on the ash content of the coal, which shall have a severe impact on the communities surrounding the power plants and the local environment. The reporting of ash percentage shall ensure transparency in washing practices and the quality of used fuel.</p> <p>Hence, we submit the third-party monitoring of ash percentage at each of the power plants should be shared with the authority as per the existing practice, and the proposed deletion of this format should be dropped.</p>
40	Report of Quarterly/Annual Average Ash Percentage (by weight) in coal received	As stated in the above point, the quarterly and annual monitoring of the ash percentage is important for assessing the quality of coal used in the power plants. Hence, we submit the proposed deletion of this format should be dropped.
45	Fuel-Oil Data	This format enables monitoring of plants using oil as a fuel and is important to ensure quality and consistent availability of fuel and efficiency in plant operation. Hence, we submit the proposed deletion of this format should be dropped.

46	Status of Progress of Villages Electrification and Irrigation Pump sets Energisation	<p>This format captures monthly progress of State-wise details of electrification of the inhabited villages, tribal villages, Harijan basties, hamlets, rural households, kutir Jyoti programme and pump sets. As per the Saubhagya portal data, there has been 100% electrification at the national level. But it has to be noted that it comes with a caveat that 100% of the 'willing households' are electrified. Multiple ground investigations report that thousands if not lakhs are left out of the electrification drive.</p> <p>For electrification of irrigation pump sets, not all 100% of farmers have received their electricity connections. Multiple news reports quoting different state governments data indicate a pendency in issuing electricity connections for irrigation running into lakhs. In this context, the proposal to remove monthly collection of such important data completely blinds the policymaking process. Hence, we submit the authority shall continue to mandate the Discoms to submit the data as per the formats. The formats can be suitably amended to remove redundant information such as villages electrified etc. if required.</p>
47	District wise status of progress of village electrification and energisation of Pump sets	<p>This format captures District-wise details of the number of BPL households electrified and pump sets energised in a month. Considering the issues raised in point 46, we submit the authority shall drop the proposed deletion of this format. We further submit that the authority shall make suitable modifications to this existing format to capture the district-wise status of ongoing interventions for pump set energisation through PM-KUSUM and other schemes.</p>

50	Villages electrified in various population groups, and the population covered as on	This format classifies the villages into different population sizes and captures their electrification status monthly. While the government of India declared that 100% of the villages in the country are electrified, multiple investigations have reported that many households continue to be in the dark. Hence, we submit not to delete this format but modify it to reflect the household level electrification status of the census villages. We further submit to make suitable modifications to the existing formats to also capture month-wise disconnections across the villages under the Discoms/SEBs
52	Details of Failure of Distribution & Power Transformers in the Month--- Year 20--	The circle wise failure data of different Distribution and Power transformers of the Discoms is one of the important indicators of the operational performance of the Discoms. It also reflects the quality of service being provided to the end consumers. Currently, this format only captures the number and percentage of failure across different capacities. We submit the authority shall not delete this format and request to classify different failure reasons into controllable and uncontrollable factors and modify the formats to capture the failure rate of different capacities across these factors.
55	Financial Turn Around of Power Distribution for the Financial Year--	The details of the expenses and revenue under major heads of the Discoms are captured in this format. These data points are important aspects to be monitored to ensure the financial turnaround of the distribution. By ensuring the data is reported annually to the authority, this format provides timely monitoring of the progress of the financial turnaround of the distribution. Hence, we submit the authority shall not delete this format as proposed.

57	Fuel Data of Fossil Fuel Based Thermal Power Stations for the month-----20----	This format captures Power plant wise monthly data on GCV, Chemical composition, Unburnt Combustibles, bottom ash and fly ash. It also captures Quarterly data on percentages of carbon, hydrogen, nitrogen, sulphur, oxygen and GCV, along with monthly data on bottom ash and fly ash. These data points are critical to assess the impact of these power plants on the environment and provide the necessary information to devise mechanisms to ensure environmental compliance. Lack of this data seriously affects environmental monitoring and creates a vacuum for academic discourse and climate change policymaking. Hence, we submit the authority shall not delete this format.
61	Monthly Peak Hours Generation Data by Coal/Lignite Based or Combined Cycle Gas Turbine (CCGT) Power Stations	This format captures the monthly data on plant wise energy generated during the morning and evening peak hours (4 hrs each) for summer and winter. This demonstrates the peaking capabilities of the plant and can provide crucial insights to market players. Hence, we submit the authority shall not delete this format.
62	Generating Company Data for Financial Study	This format captures detailed data on different technical and financial details related to the operation of Generation Companies. This data at the national level is not collected/consolidated elsewhere. This consolidated data at the national level is instrumental in close monitoring of the performance of different power plants, including benchmarking their costs. Hence, we request the authority not to delete this format.

63	Transmission Company Data for Financial Study	This format captures detailed data on different technical and financial details related to the operation of Transmission companies. This data at the national level is not collected/consolidated elsewhere. This consolidated data at the national level is instrumental in close monitoring of the performance of different transmission licensees, including benchmarking their costs. Hence, we request the authority not to delete this format.
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The following table details our submission for the sections proposed for modification:

Format No	Description of the format	Our Submission
21	Annual data of HV/EHV industry having electricity demand of 1 MW or above	We accept the modification to the current formats, which captures data of industries/CPP up to 0.5 MW. We further submit the authority to continue monitoring details such as YoY changes of different loads, peak demand on-grid/captive & consumption; Details of the produce/production of industries, Consumption Intensity, Captive Generation; Energy Conservation etc. We further suggest the authority include the daily peak demand of these entities in modifying this format. This includes daily peak demand, the block at which the peak is recorded each month.
49	District-Wise Monthly Progress of Energisation of Irrigation Pump sets	We accept the modification to the current formats, updating them to reflect the separate details of irrigation pump sets energisation with grid supply and off-grid supply. We further submit to capture the star ratings of the energised pump sets and consolidate the same accordingly.

51	Metering Status for the Month----- ----year-----	We accept the modification to the current formats, updating them to reflect detailed rural and urban data. We appreciate the authority for extending the monitoring to metering status to voltages above 11kV and bringing a separate section on monitoring AMR status.
53	Reliability Index at Customer Level for the Month----- ,year-----	We accept the modification to the current formats, updating them to reflect detailed rural and urban data on consumer-level reliability indices. We further submit the authority to define a uniform methodology (calculation formula) for computation of the indices for distribution licensees and not leave it to SERCs as stated in the draft proposal.
54	Reliability Indices (11KV Feeders) for the Month---- ,Year-----	We accept the modification to the current formats, updating them to reflect detailed rural and urban data on consumer-level reliability indices. We further submit the authority to define a uniform methodology (calculation formula) for computation of the indices for distribution licensees and not leave it to SERCs as stated in the draft proposal.