

**SILVASSA**

Industries & Manufacturers Association  
Reg. No. 27/SIAMA /2011 Dt. 11-11-2011

Office No. 8, Danudyog Shopping Center,  
Opp. Hirvavan Garden,  
Piparia, Silvassa- 396 230.  
(U.T. of Dadra & Nagar Haveli)

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Email : [sime\\_silvassa@yahoo.in](mailto:sime_silvassa@yahoo.in)  
[simasilvassa@gmail.com](mailto:simasilvassa@gmail.com)  
Website : [www.simadnh.org](http://www.simadnh.org)

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**Vice-President**

Sh. Atul Shah

**Vice-President**

Sh. Sunil Ijari

**Vice-President**

Sh. Ajit Deshpande

**Hon. Secretary**

Sh. Narendra Trivedi

**Executive Secretary**

Sh. Ravi N. Pandey

**Joint. Secretary**

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Smt. Deepika Surma  
Smt. Pinki Khemnai

**Advisory Board Members**

Sh. Vinit Mundra  
Sh. Harshad Doshi  
Sh. Nitin Kopikar  
Sh. Pradeep Lele  
Sh. Nirmal Jain

Date : 19.02.2016

To,  
Hon'ble Chairman,  
Joint Electricity Regulatory Commission For The State Of Goa &  
Union Territories,  
'Vanijya Nikunj', 2<sup>nd</sup> Floor,  
Udyog Vihar, Phase V,  
Gurgaon, Haryana (122016).

**Camp-Silvassa (D&NH)**

Hon'ble Sir,

We are very much thankful to your honor, to allow us to submit our suggestion, views and objection in reply to ARR petition filed by DNHPDCL during this Public Hearing which is kept today in silvassa by the commission.

Our association SIMA would like to submit the power-point presentation on "**Impact on Open Access on Other Industries in Dadra & Nagar Haveli**". The copy of the presentation is enclosed herewith for your kind consideration.

Our Member industries have gone through the policy of open access and we appreciate that Central Government and Hon'ble Commission is now allowing open access to the bulk consumers to purchase their power requirement from open market.

In the policy of open access the main concern of our other industries is the financial burden which will be the passed on to other consumer as the licensee (DNHPDCL) will have to sale the unutilized power at lower rate in market than the purchase rate, and the loss shall be passed on to the other consumers.

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So we request Hon'ble Commission to allow open access to such big consumers with condition that either they will surrender their power or they shall bare the loss, which may cause to DNHPDCL due to the adoption of open access.

Hon'ble sir, we are sure that Hon'ble Commission shall take care of the other small consumers and ensure that the other small consumers are not burden due to the phenomena of open access.

Thanking you,  
With regards.

For Silvassa Industries & Manufacturers Association  
Narendra Trivedi  
Secretary

# **Impact of Open Access on other Industries in Dadra & Nagar Haveli**

## No. of LT, HT & EHT Industrial Consumers in DNH

Consumer Category	Voltage Level	No. of Consumer
		FY 2014-15
EHT	220 KV	2
HT	66 KV	30
	11 KV	824
LT	11 KV	2001

## **OPEN ACCESS CONSUMER**

- A person permitted to use intra-State transmission system or receive supply of electricity from a person other than the distribution licensee of his area of supply.
- Open access shall be allowed in the phase I to all consumers requiring a supply of electricity where the maximum power to be made available at any time exceeds 1 MW subject to the satisfaction of the conditions contained in the Act and these regulations.

# **Impact of Open Access Consumers On DNHPDCL**

- Daily Power scheduling by the DNHPDCL shall be disturbed as open access consumers procure power from outside and which will results into power surrendering by DNHPDCL which will lead to burden on other industries.

## **Impact of Open Access Consumers Or DNHPDCL Contd...**

- Approximately, 300 MW is targeted in open access for FY 2016-17.

This is more than 45% of the cumulative demand of the DNHPDCL.

- Open Access consumers have dual advantage of receiving power either from outside or from DNHPDCL as and when required. This results into unnecessary capacity blocking by DNHPDCL.

## **Impact of Open Access to EHT/HT Consumers on other Consumers**

- FPPCA burden of domestic consumers used to be taken up by industrial consumer. As FPPCA is not applicable on open access, the burden is spread to rest of the consumers. HENCE FPCCA SHOULD ALSO BE CHARGED TO OPEN ACCESS CONSUMERS



## **Impact of Open Access to EHT/HT Consumers on other Consumers Contd...**

- The DNHPDCL is regulated entity and make profits approved by Hon'ble JERC. Gap income, if any, needs to be recovered from existing consumer. This poses a risk being created by open access consumers to the other consumers.

## Prayers

- Open Access may be allowed in the U.T. Detailed study should be carried out for finding optimal value of open access to be granted by DNHPDCL.
- Open Access should not be allowed at the cost of additional burden on other consumers.
- Consumer tariff should not increase solely due to open access, rather it should be decreased.
- .



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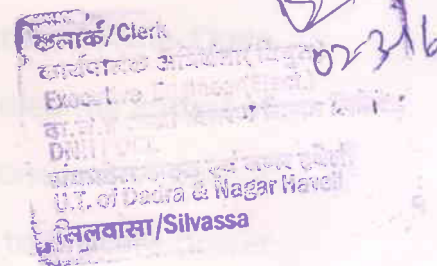
Sh. Nitin Kopikar

Sh. Pradeep Lele

Sh. Nirmal Jain

Date:- 02.03.2016

To,  
Shri Ashish Kundraji,  
Hon'ble Administrator,  
Daman & Diu and Dadra & Nagar Haveli,  
Silvassa.



**Sub: Representation of Industries Association on the issue  
of Open Access.**

Hon'ble Sir,

We appreciate the initiative of the Administration, to attract new investment in UT's of Daman & Diu and Dadra & Nagar Haveli, under the program of "Make in India" launched by Hon'ble Prime Minister, Shri Narendra Modiji.

Central Government is giving thrust to MSME's Sector considering the potential of huge job opportunities by this sector.

Recently many large units in Dadra & Nagar Haveli have planned and have applied to DNHPDCL, to allow them to buy their power requirement from open market through Open Access mechanism.

*Handwritten signature and date 02/03/15*  
P.A. to D.C.



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Sh. Pradeep Lele

Sh. Nirmal Jain

In principal, we do not have any objection to the Open Access Policy but our association have studied the impact of such Open Access, on other small consumers and it transpire that, by allowing such big units to procure power from Open Access, the other MSME's units, general public and other consumers will be burdened financially and existence of MSME's units functioning in Dadra & Nagar Haveli shall be at stake.

For this we have already submitted our representation, to Hon'ble Joint Electricity Regulatory Commission for the States of Goa & Union Territories on 19.02.2016 along with our power point presentation on "Impact of Open Access on other Industries in Dadra & Nagar Haveli". This representation is submitted to Honl. JERC and the copy of the said representation are attached herewith for your kind reference.

We would like to submit that, the big consumers are opting the procurement of power from Open Access to enhance their profit, while the small people are



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approaching your kind honor to ensure our existence.

Your goodself shall take appropriate decision and allow

Open Access to such big consumers with the condition

that either they will surrender their power permanently or

they shall bear the loss which may cause to DNHPDCL due

to the adoption of Open Access Mechanism otherwise, the

DNHPDCL shall have no option except to recover the loss

from other small consumer which shall adversely effect

the existence of MSME's units.

We are sure that your kind honor shall look into the matter  
and take the appropriate decision in the interest of MSME's  
and other small consumers.

Thanking you,

With regards,

**For Silvassa Industries & Manufacturers Association**

  
Sunil Ijari

Vice President





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**"Large Units are opting Open Access to enhance the profit and small MSME's are representing for their survival and existence".**

Copy to Hon Secretary Power DD & DNH.

Copy to Superintendent Engineer, DNHPDCL



Coordination Group of

**Silvassa Industries Association, Silvassa**

**DNH Industries Association, Silvassa**

**Silvassa Industries and Manufacturers Association, Silvassa**

Date 02.03.2016

To,

Hon'ble Administrator and Chairman,

DNH PDCL

Silvassa

Subject: Open access – Cross burden on other consumers.

Sir,

This has reference to the meeting of yesterday, i.e. 01.03.16, held in the chamber of Executive Engineer, DNH PDCL, regarding Open Access permission to certain consumers.

The data shown to the Associations, regarding fixed charges paid and recovered, though was not clear, but puts a burden of around Rs. 14 Crore on other consumers.

In this connection, the declared policy of Associations has been that, open access is a welcome phenomenon, as it provides opportunity to purchase cheapest available power

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Administrator, D.O. & DNH  
SILVASSA. - 396 230

*[Signature]* 03/03/2016

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Coordination Group of

**Silvassa Industries Association, Silvassa**



**DNH Industries Association, Silvassa**



**Silvassa Industries and Manufacturers Association, Silvassa**

to consumers, but at the same time, advantage of one consumer should not become disadvantage of other consumers.

In this connection, we submit:

- a. DNH PDCL should on war footing surrender 200 MW power, so that, fixed charge should be reduced. Right now, it is paying fixed charges at 1050 MW, while our regular consumption is less than 650 MW. Therefore, contract load of 850 MW should be a safe preposition. It will cut down fixed charge immediately.
- b. Saving (a) above, if, DNH PDCL still has to pay some charges or is forced to, buy some minimum quantity of power under various agreements and so purchased power is sold at loss in open market, such burden should be loaded only to concerned open access consumers proportionately and in no case to other consumers.
- c. DNH PDCL be directed to seek Hon'ble JERC's approval to allow it to charge additional cost from open access consumers.
- d. Any open access consumer, who wants to surrender the power, should not be insisted upon minimum charge for seven years. The provisions of supply code should be followed. The supply code provides, that, minimum demand charges



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should be insisted upon only two years, if they have not used power even for those two years. Those who have used power and paid bills for two years should not be asked for minimum charge.

- e. Till clarity is worked out, it is desirable to maintain status quo and in no case other consumers should be put to disadvantage because of open access facility provided to certain consumers.

An early action is requested.

Thanking you,

Yours faithfully,

For

**Silvassa Industries  
Association**

**Atul R Shah  
Secretary**

**DNH Industries  
Association**

**Dr. R Shelke  
General Secretary**

**Silvassa Industries and  
Manufacturers Association**

**Sunil Ijari  
Vice President**