

**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)

Tel. : (0260) 2640349
Cell : 076000758821, 07600673570
Email : sima_silvassa@yahoo.in
simasilvassa@gmail.com
Website : www.simadnh.org

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Vice-President

Sh. Ajit Deshpande

Vice-President

Sh. Atul Shah

Vice-President

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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', 2nd 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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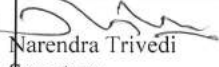
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So we request Hon'ble Commission to allow open access to such big consumers with condition that either they will surrender their power or they shall bare the loss, which may cause to DNHPDCL due to the adoption of open access.

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 result 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 in 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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