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Appeal Petition No. P/052/2026
(Present A. Chandrakumaran Nair)
Dated: 24-11-2026

Appellant : Sri. S. Chandrasekharan Pillai,
Kanakamangalam, Panavely P.O,
Kottarakkara, Kollam (dt)- 691532

Respondent : The Assistant Executive Engineer,
Electrical Sub Division, KSE Board Ltd,
Ayoor, Kollam (Dt).

ORDER

Background of the case

The appellant Sri. Chandrasekharan Pillai is a domestic consumer of the Licensee KSEBL under their Electrical Section, Valakom. The consumer no is 1145921004338 and this an LT 3 phase connection under the tariff LT 1 with connected load 7.82kW. The Appellant had installed a roof top solar with capacity 3 kWp which is connected to the grid of the Licensee. As per the agreement executed with the Licensee by the consumer, the excess energy produced by the solar plant is exported to the grid. Then the prosumer draw power from the grid which is considered as the Import power. The difference of export & import is banked as per the agreement. After installation of the solar plant, the consumption was nil and licensee had billed only for the fixed charges. There was excess energy every month which was banked in his account. But the bill for month of April was very high amounting to Rs. 3,407/-. The appellant disputed this bill and approached the section office of the Licensee, to resolve the grievance. As the Grievances was not reddressed by the Licensee, the Appellant had filed the petition to CGRF (Southern Region, Kottarakkara) vide petition no. OP/09/26-27. The CGRF had issued order on 27/07/2026 after hearing the parties. Aggrieved by the order of CGRF, the Appellant had filed this Appeal Petition against the Order of CGRF.

Arguments of the Appellant

My consumer No 1145921004338 LT-1 3Phase under Electrical Section Valakom, Kottarakkara Divison. I had installed On grid roof top solar system of 3KW during MAY-2025. Till MAY 2026 (consumed for APRIL 26) Bills for a minimum amount. But for the May 2026 it was for Rs.3407/-. Then I

submitted a complaint on 14-05-2026 to the Electrical Section Valakom regarding mismatch in the Generation & export of solar production under acknowledgement. Very bad to say till date they were not replied for it. I understood, they were waiting for disconnection date and pressurize me to remit the amount. At the far end of the month, i.e., 23-05-2026 I had filed the complaint with the CGRF, Kottarakkara and requested for a stay as they told remitted 50 percent of the bill deferred the invoice, the matter was informed to the available person at the section office. Even after, 4 times from KSEB Valakom telephoned and threatened being disconnection. Finally I contacted CGRF & AE, Valakom to stop the harassment.

The hearing against my complaint was held at Kottarakkara on 14-07-2026, Chair person Smt. Laila N.G., Members Smt. Sajina.T & Ligin K.G were present. Another member Advocate C.K. Harikumar is not present, however seems to be signed in the order. Majority of the members are KSEB employees. Myself in person & my helper Mr. Philip attended. On behalf of the KSEB Mr. BIJU.B., AE, Valakom and Mr Santhosh Kumar Senior Superintend were present. During the hearing I have expressed my concern. Generation during the month is 418 units as per solar meter and export recorded only 205 units which is not reliable. In the previous months average transmission loss is only less than 10 units (subsequent billing also very meager). If the unaccounted 213 units to be considered I will be out of TOD billing. My consumption statement for the last two years given, nowhere else, monthly consumption not exceeded 300 units, and average only less than 200 to 250 units. But particular this month shows 540 units is suspicious. Myself and my wife only staying at the house. My wife having allergic to Air conditioner and maximum use of AC is only one hour that is also after 10pm. There was an excess of 61 units for the month of April 2026 not Banked for the year 2026-27 being Financial Year 2025-26 closed on 31-03-2026. House was locked due to my hospitalisation for 8 days from 01-04-2026 to 08-04-2026. During the course of hearing itself I could understood that the Chairperson is prejudiced and is in favour of KSEB. In the order she Based only the written statement given by the KSEB and not recorded and neglected all my arguments and requests.

There finding was my house fitted with 3 Air Conditioners, Three water heaters. My replay, True it is fitted, but using while children are coming once in a while and water heater use is only at the time of rainy season, being Solar water heater is fitted since 2012 onwards. I am not using Iron Box, or Hot plate for cooking. Input connection of the Solar Inverter is connected to the outward cutout of the KSEB supply, hence I could use directly the Solar energy generated for my domestic purpose and balance only exported to the grid. For my doubts technical answer nobody given. I am not using the hybrid inverter, no storage whether I could use the solar energy while external power was disconnected nobody answered. If it is not connected to the meter how the export units were calculated by the Net meter. If I can use, whether there is a duplication of consumption reading may be happened, and I have to pay the energy generated from the solar plant also. All the above Technical doubts, even the Deputy Chief Engineer could not give an answer, and I requested the Chair person to obtain an expert opinion, which was not considered.

I am presenting this complaint not because of the mere money matter, already paid the 60 percent of the demand. KSEB is charging at their own will and wish, and threatens the disconnection. Normal people may not go behind the complaint because of the prolonged procedures and of the "DAMOCLES SWORD" of disconnection. May I submit the following prayers for your perusal and kind consideration. Please issue orders to the KSEB, that to make into account of 213 units generated but not recorded in the exports. The matters in favour of KSEB they are taking the average clause with interest charged on the consumer. Rules are not one way and it may be applicable to consumer side also. The same I requested to the CGRF which is not considered and not recorded. Financial Year 2025-26 closing on 31-03-2026 and as on date the disputed 61 units banked were not in the picture and the reading done on 4th May, 2026 is not Included. Moreover the Invoice given to me shows a credit of 1571 units. Boards argument that it is already included in the scheduled payment could not to be written back is the violation of common rules of Financial accounting, Audit & Provisioning. If so reading should be taken at the last working day of the Financial Year. Please issue orders to add back the 61 units to current banked units. So far I am not received the above mentioned payment being customers money is also valuable, Please issue orders to pay the amount to my account with 18% Interest from 01-04-2026 without further delay.

While at the time of the argument Chairperson, admitted that, no reply of the complaint is a serious mistake from the part of the KSEB and not mentioned the same in the order and conveniently omitted. Please issue an order for an internal enquiry. Because I got it acknowledged they admitted that they received the complaint. I request you to issue orders to defer the balance payment till the final orders. Since I am suffering from ill health very difficult to travel to Ernakulam and request you to list the hearing near to Kottarakkara. Hereby I humbly request and pray to consider the above facts and issue a favourable order.

Arguments of the Respondent

The Appellant Sri. S. Chandrasekharan Pillai is an LT-1, 3 Phase domestic consumer with Consumer No. 1145921004338 under Electrical Section, Valakom, having a sanctioned connected load of 7820 Watts. The prosumer has installed a grid-connected Solar Roof-Top Generation Plant having a capacity of 3 KWP in his premises under the private model scheme, making him eligible to use 100% of the solar energy generated from the plant. Since the prosumer installed a grid-connected solar generation system and executed an agreement with KSEBL, metering, billing, banking of excess energy generated, and adjustment from banked units are strictly governed by the provisions contained in the Kerala State Electricity Regulatory Commission (Renewable Energy and Net Metering) Regulations, 2020 (as amended from time to time). As per the regulations, when the prosumer uses excess energy from the grid, the bill for such excess consumption is raised at the prevailing tariff, and the prosumer is legally liable to remit the bill amount.

In line with Regulation 16 of the KSERC Net Metering Regulations, 2020, a net meter is installed by KSEBL and a solar generation meter (renewable energy meter) is installed at the cost of the prosumer. Meter readings of both meters are recorded regularly every month, and bills are generated in accordance with the prevailing Tariff Order (effective from 05.12.2024 to 31.03.2027).

SOLAR GENERATION METER READINGS

Date of Meter Reading	Time Zone	Initial Reading	Final Reading	Net Generation
01.01.2026	Normal	2793	3323	530
	Peak	4	4	0
	Off Peak	0	0	0
01.02.2026	Normal	3323	3830	507
	Peak	4	4	0
	Off Peak	0	0	0
01.03.2026	Normal	3830	4288	458
	Peak	4	5	1
	Off Peak	0	0	0
01.04.2026	Normal	4288	4864	576
	Peak	5	6	1
	Off Peak	0	0	0
01.05.2026	Normal	4864	5282	418
	Peak	6	6	0
	Off Peak	0	0	0

As per the readings recorded on 01.05.2026 (for consumption during April 2026), the cumulative solar generation was 418 units. The cumulative import from the grid was 540 units (227 Normal + 132 Peak + 181 Off-Peak), and the cumulative export to the grid was 205 units. Sub-Regulation 3(ii) of Regulation 21 of KSERC Net Metering Regulations, 2020 mandates that when grid supply exceeds injected energy, a bill shall be raised for the net electricity consumption at the prevailing tariff. Since the gross import (540 units) exceeded the threshold of 250 units per month, ToD (Time of Day) billing structure became applicable as per General Condition (10) of the KSERC Tariff Order. After adjusting exported 205 units, the net import of 335 units was billed under ToD tariff, amounting to Rs. 3,407/-.

The Appellant contends that consuming 213 units directly from solar generation is not possible and claims the discrepancy is erroneous. This contention is factually incorrect and technically baseless. The outgoing terminals from the solar inverter are directly connected to the outgoing

terminals of the isolator unit at the premises. Therefore, solar energy generated during daytime is consumed directly by the connected appliances in the house first, and only the remaining surplus energy gets exported to the grid through the net meter. Out of 418 units generated, 213 units were utilized directly in the premises, and 205 units were exported to the grid.

Sub-Regulation (5) of Regulation 21 of the Net Metering Regulations specifies that net banked electricity balance at the end of a settlement period shall be paid to the prosumer at the approved Average Power Purchase Cost (APPC). The banked quantum up to the previous settlement year (2025-26) was finalized as of 31.03.2026 and set aside for financial settlement. As per rules, no carry-forward or adjustment from the previous year's banked energy is permissible into the new financial year (ie from 01.04.2026 onwards. Upon receiving the complainant's petition on 14 May 2026, the Senior Superintendent of Electrical Section, Valakom, contacted the petitioner via phone and thoroughly explained the technical features, net metering rules, and ToD billing procedures applicable to solar prosumers. However, the petitioner refused to accept the clarification.

The Appellant had filed a complaint before the Consumer Grievance Redressal Forum (Southern Region), Kottarakkara, registered as OP No. 09/2026-27. The Hon'ble CGRF conducted a detailed hearing on 14-07-2026 in the presence of both the petitioner and the respondent officials. After thoroughly examining the meter readings, ToD tariff conditions, KSERC Net Metering Regulations 2020, and arguments raised by both sides, the Hon'ble Forum arrived at the finding that the electricity bill for Rs. 3,407/- issued for May 2026 (for consumption in April 2026) is mathematically verified, legally sustainable, and strictly in accordance with regulations. Consequently, the Hon'ble CGRF passed the Final Order on 27th July 2026 dismissing the petition as devoid of merits.

In light of the facts and circumstances stated above, it is most respectfully prayed that the Hon'ble Ombudsman may be pleased to; dismiss the Appeal Petition filed by Sri. S. Chandrasekharan Pillai. Uphold the decision/order passed by CGRF, Southern Region, Kottarakkara in OP No. 09/2026-27 dated 27-07-2026. Direct the Apellant to remit the billed amount of Rs.3,407/- along with applicable surcharge/interest. KSEBL has taken all possible steps for rectifying his grievance as alleged in the petition. All the facts stated above are true and correct to the best of my knowledge, information and belief. Therefore, it is respectfully prayed that the Hon'ble Court may be pleased to dismiss the petition.

Counter arguments of the appellant

April reading for the May-26 Bill was taken on 04-05-26, there is a four days difference of reading. Myself and my wife alone are staying in the house. Our children are abroad and usually their visit during the July, August September months. I am attached a summary of my consumption, import and export of units before and after installation of the solar plant. Before installation my average consumption was between 200 to 250 units per month. After

installation in the same usage pattern the consumption shows on higher side. During the disputed month it shows 540 units. Out of it 8 days house was locked due to my hospitalization from 1 April to 8th April.

During the disputed month generation in the solar plant was 418 units and recorded the export only 205 units with a vide difference of 213 units which caused TOD billing. The consumption and the export seem to be suspicious. Written complaint given to the section on 14-05-26 itself with acknowledgement to the Section Office, Valakom. Not replied till 27-05-26 and hence I filed the complaint before south zone CGRF, Kottarakkara. And their order was partial and purely based on the written statement submitted by Asst. Ex. Engineer, and ignored all my arguments.

In the reply of the Section Office they says they answered my complaint is absolutely wrong. Every day I will call to the land line number of the section office the girl in the reception ask me the purpose, consumer number, mobile number and reply call back, which will not happend. It was a routine practice and on 25th (nearing the disconnection date) I asked strictly I want to talk the concerned person then only Mr. Santhosh Kumar was ready to talk to me. He explained about the Solar system and how it working and stated I can use from the system and balance only exported. Also he told the billing system is centralized and he couldn't do anything. Then only I approached learned CGRF 50% remitted and obtained stay.

Next day after filing the complaint from the Section calling me and threatening me remit the amount or face disconnection. It continued three days and finally I personally contacted Asst. Ex. Engineer and stopped it. In their reply point 6 is baseless and meaningless with the on grid and off grid systems no difference. If so I have to be clarified the following points raised by me. Input connection of the Solar Inverter is connected to the outward cutout of the KSEB supply, hence I could use directly the Solar energy generated for my domestic purpose and balance only exported to the grid. For my doubts technical answer nobody given. I am not using the hybrid inverter, no storage whether I could use the solar energy while external power was disconnected - nobody answered. If it is not connected to the meter how the export units were calculated by the Net meter. If I can use, whether there is a duplication of consumption reading may be happened, and I have to pay the energy generated from the solar plant also. All the above Technical doubts, even the Deputy Chief Engineer could not give an answer, and I requested the Chair person to obtain an expert opinion, which was not considered. Banked units are accounted financial year wise and balance as on 31-03-2026 only to be reserved for payment. Here the reading was taken on 04-05-26 and in the statement says as on 31-03-26 already transferred has no logic and 65 units to be considered. This principal is followed in all the financial transactions in uniformly in India and Internationally. Average billing is not one-way and not only beneficial for the KSEB and it is also applicable for the benefits of the consumer.

Considering the above facts issue a favorable order to me with a cost of Rs.5000/- and another Rs. 10000/- for mental agony.

Analysis and findings

The hearing of the appeal petition was conducted on 29/10/2026 at 10:30 am in the KSEB IB, Paruthippara, Thiruvananthapuram (dt). The hearing was attended by the appellant Sri. S. Chandrasekharan Pillai and the respondent Sri. Biju B, Assistant Engineer (I/C), Electrical Sub Division, KSE Board Ltd, Ayoor, Kollam (Dt) and Sri. Santhoshkumar G, Senior Superintendent, Electrical Section, Valakom.

The Appellant had availed domestic connection from the Licensee under the tariff LT 1 with connected load 7.82kW. The roof top, grid connected solar plant of capacity 3 kW has been installed and then appellant had become the prosumer. The bimonthly reading and billing has been changed to monthly reading and billing. The generated energy by the solar plant was excess of his consumption and balance was banked in his account. The bimonthly bill for him as very minimum and less than Rs.300/-. The consumption of April - 2026, for which reading taken on May-2026 shows very high and accordingly bill for Rs. 3,407/- was issued to the Appellant. Since the installation of solar plant, the import of energy from the grid was less than the export. But for the month of April - 2026 the import is higher than the export and the total was also abnormally high. The total energy generated in the month of 04/2026 is 418 units. The total import was 540 units and the export was 205. Then the consumption from the solar during the day time was 418-205=213 units.

Then the total consumption was 540+213=753 units. The Appellant dispute about this consumption. The appellant's house was in locked condition for 8 days as he was hospitalized and he was taking rest in the home for the remaining days. Husband and wife only residing in the house and their children are elsewhere. There are three a/c units connected for the home. The temperature in April month was very high and hence the running time a/c units would have been increased. The a/c units would have been used during the day time also. This would have been one of the reason for the high consumption of April month.

The distribution system of their connection is fitted with an ELCB and it was functioning. The ELCB had not tripped at any time and hence the chances of earth leakage is to be ruled out. There is no construction/ Fabrication work took place during this period. Then the consumption due to additional external load is also to be ruled out.

The Appellant has not disputed about the accuracy of the meter. He is in agreement with the previous readings as well as the readings after May-2026. As there is no doubt about the accuracy of the meter, the need of meter testing does not arise.

The readings of the import export meter submitted by the respondent since 05/2025 to 10/2026 have been examined. The readings/consumption for the month April was very high and all other months the export is higher than the import and in other few months also the import is slightly lighter than the export.

The Appellant raised a technical question. The Plant is a grid connected solar plant and inverter is grid interactive inverter. This inverter is not hybrid inverter. Then the solar energy generated totally would have transferred to the Grid, and consumer couldn't use from the generated energy. Here the generation for the month was 415 units, but the exported power is only 205 units. This means that 213 units from the solar plant have been used by the consumer during day time. The output voltage of the Grid interactive solar inverter is normally set slightly higher than the Grid voltage. Accordingly, the day time load if solar generation is available will be used for the solar generation.

Then another apprehension of the appellant is that the total banked energy available in his credit on 31/03/2026 was 1571 units. The payment for this banked energy was not released by the Licensee. Then why the excess consumption of April - 2026 is not adjusted from the banked energy. The banking and release of payment for the banked energy, etc were governed by the regulations issued by KSERC. The KSERC (Renewable Energy & Net metering) Regulation - 2020; Clause 20(1) states about banking facility.

20. Banking facility for prosumers.-

> ***(1)*** *In case the energy injected by the prosumer from his renewable energy system exceeds the energy consumed by him from the distribution licensee during the billing period, such excess energy is allowed to be banked with the distribution licensee and to be carried forward to the subsequent billing periods of the settlement period.*

And Clause 2(1) (bk) states about the settlement period.

Settlement Period: *" For the purpose of these regulation is the period from the first day of April in a Gregorian Calendar Year to the thirty first day of the March in the next Calendar Year."*

The Clause 21 of the regulation 2020 clearly describes about the net metering, energy accounting, Banking and settlement

21. Net metering, Energy Accounting, Banking and Settlement.-

> ***(1)*** *The distribution licensee shall take the meter reading of the 'renewable energy system' regularly for each 'billing period' and record the readings of both the renewable energy meter and the net meter.*
>
> ***(2)*** *For each billing period, the distribution licensee shall make the following information available in its bill to the prosumer:*
>
> > ***(i)*** *Time period wise (normal hours, peak hours and off-peak hours) Renewable energy generation recorded in the energy meter for the prosumer with connected load above 20 kW, and total generation from the RE system for the prosumers with connected load 'of and below 20kW'.*
> >
> > ***(ii)*** *Time period wise electricity consumption of the prosumer with connected load above 20 kW, and total consumption in the case of the*

prosumer with connected less than 20 kW.

(iii) *Net billed electricity, if any, for which payment is to be made by the prosumer;*

(iv) *Excess energy brought forward from the last billing period;*

(v) *Excess energy carried forward to the next billing period.*

(3) *The energy accounting, banking and settlement of energy generated, drawn and injected by a prosumer with connected load of and below 20 kW shall be done as below;*

(i) *The distribution licensee, during a billing period shall extend the facility to the prosumer having connected load of and below 20 kW under net metering arrangements, to draw back from the grid, the electricity injected during a time block at a different time period without any restriction.*

(ii) *In case the electricity supplied by the distribution licensee during any billing period exceeds the electricity injected in to the grid by the prosumer from his renewable energy system, the distribution licensee shall raise a bill for the net electricity consumption at the prevailing tariff, after adjusting any excess electricity banked from the previous billing period;*

(iii) *In case the electricity injected by the prosumer's renewable energy system exceeds the electricity consumed from the distribution licensee during the billing period, such excess energy shall be allowed to be banked and be carried forward to the next billing period as specified under Regulation 20(1) above.*

(5) *The licensee shall pay to the prosumer for the net electricity balance in his account at the end of the settlement period, at the Average Power Purchase Cost (APPC) approved by the Commission; Provided that, in case of delay in payment of the net amount due to the prosumer beyond 30 days from the settlement date, the licensee shall pay interest to the prosumer at the FBIL rate +200 base points prevailing on 1st April of the settlement year.*

The settlement period is from 1st April to 31st March of next year. The total banked energy at the end of March every year would be considered for releasing the payment. The Licensee have to release the payment within 30 days from the settlement date failing which the prosumer is eligible to get the interest as per the regulation. As the banked energy available on 31/03/2026 has been accounted for the payment, the banked energy in his credit on April - 2026 has become zero. As such the adjustment for the previous financial year banked energy is not permitted as per the regulation.

On examining the readings taken by the Licensee there is no anomality noticed. No doubt about the accuracy of meter. Then it is to be concluded the consumption recorded by the meter was the actual consumption. The Licensee has to raise the bill strictly as per the KSERC regulation - 2020, and this payment is to be made by the Appellant.

Decision

On verifying the documents submitted and hearing both the petitioner and respondent and also from the analysis as mentioned above, the following decision are hereby taken.

1. The Licensee shall examine the bill strictly as per the regulation - 2020, and revise the same if needed within a period one week of receipt of this Order.
2. The Appellant is liable to pay the amount as per bill raised by the Licensee according to the decision (1) above within 10 days from.
3. the date of receipt of bill.
4. The Licensee shall not charge any interest/surcharge for the delay in making this payment.
5. No other costs ordered.

ELECTRICITY OMBUDSMAN

No. P/052/2026/ dated: 24.11.2026

Delivered to:

1. Sri. S. Chandrasekharan Pillai, Kanakamangalam, Panavely P.O, Kottarakkara, Kollam (dt)- 691532
2. The Assistant Executive Engineer, Electrical Sub Division, KSE Board Ltd, Ayoor, Kollam (Dt).

Copy to:

1. The Secretary, Kerala State Electricity Regulatory Commission, KPFC Bhavanam, Vellayambalam, Thiruvananthapuram-10.
2. The Secretary, KSE Board Limited, Vydhyuthi bhavanam, Pattom, Thiruvananthapuram-4.
3. The Chairperson, Consumer Grievance Redressal Forum, Vydhyuthi Bhavanam, KSEBL, Kottarakkara-691506.