SOLAR POWER DEVELOPERS ASSOCIATION

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SPDA/DG/2020/246 **December 22, 2020**

Sub: Request for amendment in streamlining the procedure for approval of BoM and issuance of CCDCs for Solar Projects.

1. **Our representation letter no. SPDA/DG/2020/143 dated 11.06.2020 regarding the request for approval of Project Bills of Material (BOM) for initial setting of Solar Power plant.**
2. **Our representation letter no. SPDA/PG/2020/204 dated 28.09.2020 regarding the request for amendment in the procedure for approval of BOM and issuance of CCDCs for Solar Projects in terms of submission of land documents at BoM approval stage**

Dear Shri Chaturvedi,

Greetings from Solar Power Developers Association.

This is regarding the monthly meeting held under the Chairmanship of Secretary; MNRE on 10thDecember 2020. One of the issues discussed included the challenges faced by Solar Power Developers regarding the procedure for approval of BoM. It may be noted that presently for issuance of Concessional Customs Duty Certificates(CCDCs), SPDs must submit land documents at the BOM approval stage.

According to the current process, developers must upload various documents on the MNRE portal for approval of Total Bill of Materials (BoM) to obtain Customs Duty Exemption Certificatedespite the fact only a few items like modules and inverters are typically imported.

We wish to highlight that getting BoM approval from MNRE has become a cumbersome processhighlighted by SPDA earlier and in the representation letters to your kind office dated 11.06.2020 and 28.09.2020. (Enclosed for your reference)

We have outlined,fewbottlenecks that need amendments andprovisions for streamlining the entire process,whichis mentioned below:

1. Amendment in Requirement of Land documents

Approval of BoM for CCDC requires 100% of land in terms of lease deed/sale deed. In this regard, the Ministry of Power (MoP) in its fourth amendment to *"Guidelines for Tariff Based Competitive Bidding Process for Procurement of Power from Grid-connected Solar PV Power Projects, 2017"*dated 22.10.2019 has allowed them to submit the documents for sale/lease agreement for 100% of the required land on or before the scheduled date of commissioning.

The CCDC issuance process takes time, and having 100% land upfront for a big-ticket size project is very difficult. Hence, we propose a staggered approval of the BOM corresponding to the land documents produced. Accordingly, the final BoM and the land requirement can bereconciled at the time of project commissioning.

Furthermore, currently,the land requirement is calculated @ 4 acres per MW for BoM approval. However,with the advancement of technology inSolar Modules, the land requirement has reduced substantially. Thus, instead of computing land requirement @ 4 Acre / MW, MNRE should accept the estimate based on the plant layout & design provided by Solar Power Developer.

Request:

- MNRE must review the dependency onland documents for application of CCD certificate. As land is a significantrequirement for CCDC application, it becomes a bottleneck for Developers. The land withcomplete documentationrequires time, but the material like Inverter, Tracker, etc., are needed to be imported at the early stage of the project. Hence, land documentation becomes a source of delay.
- Further, CCDC must be issued on submission documents for partial land,which can be amended to submit balance land documents. Therefore, CCDC may be givenbased onan undertaking from SPD wherein the absence of land to the extent project is not commissioned as per BOM submitted; the benefits could be withdrawn to the proportion of capacity not commissioned.

2. Streamlining document uploading process on the MNRE portal:

MNRE Portal currently allows a file size of 4 MB for uploading the documents.For the large capacity of projects, the land requirement is enormous, and with large project sizes, the size of documentation increases substantially. To limit the size to 4 MB, files are compressed, which impacts the quality of resolution.Further, since there is no means of physical copy acceptance by MNRE of such documents.

While applying for a certificate, Engineering, Procurement, and Construction (EPC) Agreement, the maximum size of the file uploaded is limited to 2 MB. In this regard, it is requested to increase the capacity of such storage to at least 100 MB for land documents in the interest of compliance and saving effort at both ends.

As per the current practice, queries are sent on a piece-meal basis, which is time-consuming and leads to unnecessary delay.

Request:

For expeditious approval, we propose streamlining the documentation process so that,

- All the queries about the BOM approval should be consolidated and sent collectively
- Documents such as Cable Calculation Sheet, Grid connectivity approval, etc., are not relevant to the issuance of Customs Duty Exemption and should be minimized and eliminated to prevent delay while seeking departmental approval.

3. Quantity tracker

As per the industry practice and design criteria, the Module Mounting structure's weight for a fixed-tilt structure is approx. 23 - 28 MT/MWdc, and for the single-axis tracker system,it is 42-50 MT/MWdc (with 460 Wp module). The tracker's weight is more than a fixed-tilt structure, as the tracker is subjected to static, dynamic, and torsional forces while the fixed-tilt structure is only subjected to static force. Solar trackers are now widely utilised as it results in an increased generation.

Request:

- To review the existing norms of the allowable solar tracking system to determine the quantity of steel required. Since the tracker is a movable part, various factors determine the tracker's design and selection, i.e., Aero Elasticity, Wind Tunnel study, and torsional force impact, which are to be determined and thus, such additional component ultimately increases the weight of the tracker. Generally, all major suppliers design the structure at a maximum of 47m/s wind speed, which can sustain all weather conditions for atleast 25 years of life. Considering the same, this would have required ~ 45 MT Steel per MW of installation. For illustration purposes, please find the detailed working for Tracker Quantity Breakup with required MT of Steel as Annexure-1 attached separately for your reference.

4. **Amendment in the requirement of Grid Connectivity approval for Distributed Solar generation projects**

At present, there is no requirement for Grid connectivity approval for the distributed solar projects where the plant is proposed to be installed within the premises and proposed to be connected to an internal distribution system for 100% consumption within the premises. For such cases, the only intimation to the Discoms is sufficient

Request:

Hence, instead of grid connectivity approval,we request MNRE to

- Exemptgroup captive and rooftop solar projects from grid connectivity approval for
- Accept the intimation document to the concerned state utility for setting up the project for group captive and Rooftop projects

Considering the above, we request you to form a committee to deliberate on the matter abovein finding a way forwardto resolve bottlenecks.

We look forward to your kind support in the matter.

Thanking you.

With warm regards

Yours Sincerely,

To,
Shri Indu Shekhar Chaturvedi
Secretary
Ministry of New and Renewable Energy
CGO Complex, Lodhi Road
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Shekhar Dutt