



SOLAR POWER DEVELOPERS ASSOCIATION

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SPDA/DG/2020/235

November 20, 2020

Subject: Implementation of Approved List of Models and Manufacturers Order reg. Solar Photovoltaic Modules.

Dear Shri Chaturvedi,

Greetings of the day from Solar Power Developers Association.

This is in reference to the the report finalized by the committee constituted by MNRE for recommending necessary measures for ensuring smooth implementation of ALMM (Approved list of module manufacturers). We have also provided our feedback and suggestions for consideration .

We are glad that the committee has taken cognizance of the critical issues and have addressed them through some vital measures like:

1. Exempting all the projects from ALMM that will have bids have concluded before the date of submission
2. Postponement of ALMM for cells

As per the guidelines, before inclusion in the ALMM list, a NISE team (National Institute of Solar Energy) was required to visit the manufacturers who had applied for the purpose. Of the total applications received for 34 Solar PV module application for 19,284 MW, NISE has already recommended a capacity of 2,070 MW and had given a timeline of November 15, 2020, for completion of the task for the rest 17,214 MW. Thus, the committee has recommended the ALMM for modules to be published on December 1, 2020.

While we had highlighted the issue in committee discussions, one of the critical aspects of the efficiency and rating of modules has been missed in the report. We want to bring to your kind notice that due to the absence of sufficient R&D of solar in India, the quality/efficiency of the imported modules is higher than those manufactured domestically.

Due to rapid changes in technology, the single modules with capacity up to the range of 500-600 Wp and efficiency levels of >21% and above are available in the international market and continue to increase. This has significant implications on capital cost as higher-rated modules result in major cost reduction in land and BoS.

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- Deputy National Security Advisor, Govt. of India • Defence Secretary, Govt. of India • Secretary Defence Production, Govt. of India
- Secretary Ministry of Health, Govt. of India • Director General, Sports Authority of India

In the last five years, a significant reduction in solar tariffs has resulted from increased efficiency and increased capacity ratings. Hence, it is incredibly critical from a developer's competitiveness perspective. It has become even more critical as we all know DISCOM's disinclination of solar power on higher tariffs. As you are aware, SECI is yet to finalise/ sign PSA to the tune of 16 GW capacity.

While accepting the Report MNRE may also consider the total capacity to be bidded out in next year and domestic module capacity available to meet the demand and process of the modules. It will be very difficult for Developers to bid for the project on the basis of proposed manufacturing capacity that is likely to be included in ALMM list in future.

Considering the above, we request that efficiency and module capacity rating be kept as one of the criteria for finalizing the list, and an undertaking to that effect may be taken from manufacturers that get included in ALMM.

With warm regards

Yours Sincerely,

**To,
Shri Indu Shekhar Chaturvedi
Secretary
Ministry of New and Renewable Energy
Government of India.**



Shekhar Dutt