



Annexure-I

Suggestions/Recommendations on the Electricity (Rights Of Consumer) (Amendment) Rules 2021

SPDA highly appreciates the initiative taken by the Ministry of Power towards the the development of Rooftop Solar Project and hereby requests to consider the below observations on the draft consumer rules amendment 2021.

1. Net Metering for RESCO Model

Globally net metering has become adaptive for the rooftop solar plants to harness the maximum energy, while in the absence, rooftop plants could not perform upto their rated capacity, resulting in wastage of green power and country resource. However, State like Gujarat has allowed net metering for RESCO model in the recent solar policy but transaction is being named as Third Party and imposing all the charges like Cross subsidy Surcharge and Additional surcharge which restrict the development of rooftop solar projects in the State as non-solar companies/individuals/MSME's/Government would not be engrossed to invest into the non-core business, therefore we would request Ministry of power to allow the solar power developer to install the Rooftop Solar Power Plant on the roof/premises of the consumers under RESCO model and should accord net metering approval for maximum utilization of resource without the imposition of all these charges.

No government shall impose any charges on the generation and consumption of the power in the same premises despite mode of investment whether it is captive or Resco.

2. Energy Accounting under Net Metering/Gross Metering

“(ia) Gross metering means a mechanism whereby the total solar energy generated from rooftop plants and energy consumed by the prosumer are accounted separately i.e Retail tariff for prosumers consumption and feed-in tariff for rooftop generation.”

Comments: The energy generated by the rooftop is consumed at the same location so the equal units of energy generated from the rooftop and energy consumed by the prosumer should be settled at the same retail tariff and export or excess energy shall be settled at the tariff determined by the Hon'ble Commission or Feed-in tariff.

As Solar being an intermittent power, therefore, the energy generated has to be utilized by the consumer/DISCOM on real-time basis, and thereafter if any unutilized energy remains in the system has to be settled with the energy consumption of the consumer on monthly/billing cycle.

The Banked Energy shall be permitted to be carry forwarded from month to month and the banked energy shall be utilized within the same financial year failing which the unutilized energy at the end of the financial year shall be purchased by the DISCOM at the tariff determined by the Commission.

3. Imposition of Cross-Subsidy and other OA Charges on Rooftop Solar Projects By some states

Some states are levying charges on the sale of power under the RESCO model. The rooftop solar power plants are installed on the roof of the consumer or within their premises and the power generated from such plants gets consumed within the same premises without interfering with the grid, therefore on sale of power under the RESCO model to such consumers should be exempted from the imposition of Cross Subsidy/Additional Surcharge/Wheeling or any other open access charges.



However, imposition of any such charges will diminish the development of rooftop solar energy in the state.

4. Net metering For Central Government /State Government Buildings

All government and central government organizations should get deemed approval for net metering despite the state regulations.

We sincerely hope our submission shall go favourably at your end and we shall be informed accordingly.

Anticipating your kind cooperation and assuring your best attention shall always remain.