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SPDA/DG/2021/289

March19, 2021

Sub: Request for mandating manufacturing higher efficiencyPV modules in India

Dear Dr Mishra,

Greetings from Solar Power Developers Association.

At the outset, SPDA welcomes the Government's decision to impose BCD on imported Solar Cells and Modules. This is a path-breaking initiative in strengthening the manufacturing sector and achieving 'Atma-Nirbhar Bharat's goals. We feel that India has all the capabilities needed to emerge as the next manufacturing hub.

In hindsight, the envisaged policy shall discourage imports of PV module, boost domestic manufacturing, and spur job creation. However, the Indian Government needs to have a stable long-term strategy and provide a balanced framework. The Government should boost domestic production and provide opportunities for Indian companies to compete in the global market. The International Solar Alliance's existence, primarily due to India's efforts in coordination with France, offers a ready-made market of 1 TeraWatts capacity across more than 120 nations. Thus, to be competitive and relevant in these markets, Indian manufacturers must beat par with other global suppliers.

As per the MNRE vide order for the Approved Models and Manufacturers of Solar PV Modules (requirement for Compulsory Registration) Order, 2019 issued on 10<sup>th</sup> March 2021 (please see Annexure I). The ALMM list comprises Multi crystalline manufacturers with a capacity range of 40 Wp to 360 Wp, a fast becoming obsolete technology.

The global market is transitioning towards increasing bifacial modules with monocrystalline PV technology of power output generation ranging from 500-600 Wp.With rapid solar technology innovation, Indian firms are struggling to keep pace with the global constant manufacturing capacity upgrades, especially with China. Hence, the innovative ecosystem needs to be built into the policy design framework by creating a roadmap for reducing the entry barrier ofbetter technology PV modules from laboratory to fabrication. The Government can ensure this by mandating cutting-edge and latest technologies for manufacturing in India and only including those in the ALMM list that are globally competitive.

## Request:

An enlightened, patient, long-term view is required to ensure manufacturers do not cave into short-term returns but invest in advanced technologies and put necessary capital in R&D for sustainable competitive advantage. Hence, we request the Government of India toinclude better technology PV modules with higher power output from an export-oriented perspective, and we must disincentivizethe usage of obsolete technologies.

We look forward to your kind support in the matter.

Thanking you

Will warm regers

Yours Sincerely,

Shekhar Dutt

To,
Dr. P.K. Mishra
Principal Secretary to Hon'ble PM
Prime Minister Office
Govt. of India
South Block
New Delhi