

the solar power plant and would kill the ambitious targets of the Central Government and will inturn have a huge impact on the climate control.

AP DISCOMS are trying to create hurdles in all the possible ways to stop the setting up of solar energy system without having any awareness of the benefits of the distributed solar energy systems.

1. Breakeven period of Solar Power Plant

We wish you to inform you that subsidies for the solar power plant under Net Metering scheme are removed for the most of the consumers except for those who has consumption of less than 200 units.

Solar power project setup with bank finance with interest rate of 12%, will take atleast 10 to 12 years for the breakeven period. Any benefit from the solar power system can be realized only after 12 year.

Hence limited the SRT Period for 10 years, will be a big setback for the project and no one will be interested to setup the project.

The SRT Agreement should be continued for 25 years.

2. Disadvantages of Gross Metering

In Gross metering system , the DISCOMS will pay for the Net Exported units based on the Average pooled purchase cost (Rs. 3.75/Unit). The discoms are proposing that the "Difference of Pooled purchase cost and Balancing cost (Rs. 3.5/Unit) should be

paid for the Net Exported units"). so the net amount payable is Just Rs. 0.25 Paisa Per Unit.

Consider a domestic consumer who installs 1 KW Solar power system. The system generates 5 units per day. Assume that total consumption in the morning hours is 2 units per day. The Net exported units per day is 3 Units per day . Total exported units per month is 90 Units.

If the discoms pays Rs.22.5 (90 units X Rs 0.25/Unit) per month to the consumer, the break even period for the solar power system is more than 40 years.

In this kind of scenario it is big loss to the consumer and no one will setup the solar power system.

3. Net Metering system

As per the solar power 2019, the capacity of the solar power system that can be installed under Net Metering is limited to the contracted Demand of the consumer. So energy generated from the solar power system will be consumed from the premises owner itself. There is a very limited scope of the excess export from the Net Metering system

Example :

If a consumer a contracted MD of 300 KVA, Then only 300 KW Solar Power system can be installed in their premises. The energy generated from the solar power system will be just self sufficient and the percentage of energy exported to the grid are not even 1%.

In the Net Metering system, the energy generated from the solar power system can be adjusted in the current month billing only. Earlier the DISCOMS used to consider the

6 months settlement period and later changed it to 3 months settlement period and now it is just 1 month settlement period.

Net Metering system has created a excellent distributed generation system, where the utilized power from the system is exported to the grid. The exported energy is consumed by the DISCOMS and can be supplied to the other consumers and to other feeders.

Net Metering system reduces the burden on DISCOMS by creating local power generating system and distribute the excess generation effectively. This reduces the transmission and distribution losses facing by DISOCMS.

The main objective of promotion Net Metering system by Central Government is reduce the burden on DISCOMS for the power management.

DISCOMS are under wrong impression that, the solar developers are installing the systems as a business motive. This is absolutely incorrect. The system are installed for just for their self consumption only.

In the Petition filed by APSPDCL, in Lr. No. APSPDCL/CGM/IPC/GM/IPC/DEE-3/D.NO.52/20, dT. 10.02.2020 for seeking ammendemnts to modalities to the exsiting solar power policy 2019. Following information is mentioned in point no. 4

Month	Billed Demand/Consumption from Grid (Units)	SRP Generation (Units)	Net Energy (Rs)	Net Monthly Payment by DISCOM	Net Monthly Payment by SRP

	A	B	B-A=C	(Rs) C X APPC	
DEC	800	800	0	0	0
JAN	1000	1200	200	800	0
FEB	1200	1000	-200	0	1800
MAR	1300	1050	-250	0	2500

A) In the Month of December and January , There is absolutely no loss to the DISCOM.

B) In the months of Feb and March, it is projected that 20% excess energy is generated is there and there is loss DISCOM. But ideally, the net energy exported in most of the cases are not more than 2%, as Net Metering is limited to the contracted MD.

4. DISCOMS Concern in Managing the Grid with Capacity of 8515 MW Renewable energy.

DISCOMS are projecting that the managing the grid with capacity of 8515 MW is difficult.

We wish you to bring to your kind notice that with all the incentives for last 5 years only 110 MW of solar Net Metering system is introduced in entire andhra pradesh. DISCOMS are misleading APERC by projecting high figure of installed capacity.

Managing the distributed system of solar net metering is very easy and more even it is helpful to the DISCOMS.

More ever the excess energy exported by the solar power plants will be consumed in the near by places by other consumers in the locality or with in the feeder level for HT Consumers. This is more benefit to the DISCOMS than loss to the DISCOMS as DISCOMS no need to procure this additional energy from the other feeders. The solar energy systems erected under Net Metering scheme are distributed across cities, towns and villages. The excess energy generated from the system can be effectively utilized by DISCOMS.

DISCOMS are treating as the solar power plant under Net Metering mechanisms are business units or not treating them as self consumption units. The same mis-conception is projected to APERC.

5. Scenario in Other States

We wish to bring to your kind notice all the Indian states are promoting Net Metering in a big way. No state in India has removed Net metering policy.

Gross metering is a big failure and it is not useful for customers.

- A. Government of Karnataka has increased the subsidies for Net Metering in the notification dated 15.03.2020 to 40% for the domestic consumers.
- B. Maharastra ERC have rejected the proposal of DISCOMS For Removing the Net Metering
- C. Rajasthan and UP Governement have increased the max capacity of the Net Metering systems to 2 MW.

We pray to the Honourable Chairman, that Net Metering should be continued for the benefit of the consumers and for the benefit of the environment. The tenure of the agreement should for 25 years.

If Gross Metering is introduced, then no one will erect the solar power system and this will be a big set back by solar programme by central government and in the controlling the pollution.

If at all the DISCOMS are thinking that Paying APPC Price is burden to them, we request them to pay 50% of Pooled purchase cost as is the case with open access power generators. This will be equivalent to (Rs. 1.875 = 3.75X 50%). This will be more reasonable price for the excess energy produced from the net metering system.

We pray to the Honourable Chairman, that Net Metering should be continued for the benefit of the consumers and for the benefit of the environment.

~~** Email~~~~commn-secy@aperc.gov.in~~

Comments/Suggestions on proposed 'Amendment to Modalities (Guidelines) for implementing Solar Roof Top Policy, 2018'

From : ashwin@prayaspune.org

Wed, Mar 18, 2020 09:39 AM

Subject : Comments/Suggestions on proposed 'Amendment to Modalities (Guidelines) for implementing Solar Roof Top Policy, 2018'

 1 attachment

To : Commission Secretary <commn-secy@aperc.gov.in>

Cc : sreekumar@prayaspune.org

To,
The Secretary,
Andhra Pradesh Electricity Regulatory Commission
Hyderabad
18th March 2020

Dear Sir,

Please find attached, Prayas (Energy Group)'s submission on proposed 'Amendment to Modalities (Guidelines) for implementing Solar Roof Top Policy, 2018'.
Please consider our submission on record.

--
Kind Regards,
Ashwin Gambhir, Sreekumar Nhalur
Prayas Energy Group
<http://www.prayaspune.org/peg/>

 **Prayas Energy Group-Comments on APERC net-metering_18-3-2020.pdf**
787 KB



Prayas (Energy Group)

Prayas

Unit III A and B, Devgiri, Joshi Museum Lane, Kothrud Industrial Area, Kothrud, Pune - 411 038, India
Phone: +91-20-2542 0720, 6520 5726, Fax: 2543 9134; Website: www.prayaspune.org/peg

18th March, 2020

To,
Secretary, APERC,
Hyderabad.

Subject: Comments/Suggestions on proposed 'Amendment to Modalities (Guidelines) for implementing Solar Roof Top Policy, 2018'.

Dear Sir,

Please find enclosed comments/suggestions by Prayas (Energy Group) on the proposed amendments for implementing the solar rooftop policy 2018. We request the commission to take our submission on record.

Thanking you,

Ashwin Gambhir, Sreekumar Nhalur, Ann Josey
Prayas (Energy Group).

Comments/Suggestions on the proposed 'Amendment to Modalities (Guidelines) for implementing Solar Roof Top Policy, 2018', by Prayas (Energy Group), Pune.

Our detailed comments on some aspects of the proposed amendments are noted below.

1. Need to continue with consumer choice over availing net-metering or gross metering.

The AP Solar policy of 2018 (dated 3/1/2019) coupled with the 'Modalities (Guidelines) for implementing the Solar Roof Top (SRT) Policy, 2018' as approved by the APERC by its order on 25th May, 2019 clearly brings out that the choice of availing net-metering or gross metering lies solely with the consumer.

The amendment to the AP solar policy of 2018, dated 18/11/2019 notes in section 3 (ii) that, '*the applicable tariff for solar rooftop projects for either net-metering/gross metering shall not exceed "difference of pooled variable cost and balancing cost" or the applicable tariff at the time of CoD whichever is less*'.

It is clear that the choice of net-metering or gross metering for the consumer is retained in the November, 2019 amendment as well. Hence there appears to be no merit in the third prayer of the petitioners, namely for the Commission to take a decision on gross/net-metering.

Further APERC should determine the pooled variable cost and balancing cost every year. As suggested by the solar policy amendment, APERC should start the process of determining pooled variable cost and balancing cost for roof top solar, through a discussion paper followed by public consultations.

Hence the Commission's order, based on the policy amendment, should be limited to changing the buy back rate for gross metering or when there is excess generation over consumption in a billing cycle within net-metering, based on the determined pooled variable cost and balancing cost.

If the APERC notifies a new buy back rate for rooftop solar, this should only be applicable for new projects commissioned after the notification of this new rate. Older projects commissioned under erstwhile policies should continue to get the benefits under those policy and regulatory dispensations or else there would be many litigations and those projects run the risk of becoming stranded assets. Such a move would also ensure reduced risk to investors and increase the legitimacy of commitments provided in state government policies.

2. Need to continue with long term agreements.

In a similar vein, we feel that there is no need to shorten the agreement period to 10 years, especially when the original 2018 policy explicitly mentions that,

The applicable tariff for either of the cases shall be equal to the average pooled power purchase cost which will be determined by APERC for the year during which the project is synchronized with the grid and the applicable tariff at the time of CoD will be paid for 25 years, in case of projects executed under both net metering and gross metering basis. The

above tariffs shall be applicable for a period of 25 years for Eligible Developers who set up solar rooftop projects within the Operating Period of this policy.

As this aspect of the policy has not been amended, it is suggested that the Commission dismiss this prayer of the DISCOMs.

3. Need to support the growth of small scale distributed solar in the state.

Point 10 of the SPDCL petition and Point 15 of the EPDCL petition mention more than 8500 MW of wind and solar capacity in AP and the challenges of their grid integration. Since the challenges mentioned refer to large scale centralised renewables, it is not relevant for this petition on roof top solar.

As per the rooftop solar map of India by BridgetoIndia, AP has an installed capacity of 202 MW out of the total of 5252 MW in the country, as of September, 2019. Out of the 202 MW, nearly 85% is by Industrial and Commercial consumers. Thus, it only has a share of 3.8% of the total rooftop capacity in the country. At the state and national levels, efforts should be to promote distributed solar with enabling policies, regulations and incentives.

As of now, with such a small base, the impact of rooftop solar on the DISCOM finances will also be minimal. Disincentivizing rooftop solar will mean that the state will forgo the benefits in terms of new job creation (which is significantly higher for distributed rooftop solar as compared to large scale solar), tapping into newer pools of investments through consumers as well as the free RPO credit for obligated entities, i.e. the DISCOMs in whose area such projects will come up.

Another consideration is that industry and commercial consumers can take the captive option with or without storage, while scaling down their DISCOM connected load requirements if feasible. Retaining them as DISCOM consumers with a reasonable tariff plan is a better option.

* * * * *

23/3/2020

From: prsatya71@gmail.com 
Subject: Public hearing for Roof top Solar Project policy amendments proposed by APDISCOMs - regarding
Date: March 20, 2020 at 12:31 PM
To: Commission Secretary commn-secy@aperc.gov.in

Dear Sir,

This has reference to the Public hearing dated March 23, 2020 for the amendment of Solar Roof top Policy, proposed by APDISCOMS.

A brief introduction about myself, I am a 3 KWP Roof top project owner installed on the Terrace of my Home, under NCEF fund vide Letter # NREDCAP/OSD/NCEF/61A/2016 dated 31.8.2016.

The Solar roof top project located in my home in Narsapuram town, West Godavari district was commissioned in the year 2017 and has been operating successfully with 100% availability and zero maintenance till date. As on December 2019, the CF export amount accumulated to 29,453.33 Rupees.

I wish to bring forward to the honorable Commission that I am proud of my Green living initiative as it not only is covering my domestic Electricity needs but also eliminating the equivalent burning of fossil fuel, a major contributing factor to Global warming as well as Environmental pollution. While I am seriously considering adding some more Solar panels and top up 2 KW to my existing 3KW project, the news regarding proposal by APDISCOMS for amendments to existing net metering policies for Solar roof tops came as a rude shock to me.

With regard to the amendments proposed, I wish to inform the honorable Commission that this certainly is not encouraging. I clearly do not understand the basis on which these amendments were being proposed.

I therefore wish to bring forward my views to your kind attention as below:

23/3/2020

1. Based on my understanding on the role of APDISCOMs with regard to Solar roof top (SRT) projects, I am of the opinion that the amendments sought by APDISCOMS are of little or no relevance to their role, which is more of a Purchaser in the agreement. This is discouraging and detrimental to the interests of all SRT owners who have invested their Terrace space, paid the installation cost and are responsible for Power production, operation & Maintenance of the equipment.
2. I am also of the opinion that this is a clear disconnect between ADDISCOMs and the initiatives of Central Government towards Green living as well as Start ups.
3. In a tropical country like ours, Sunlight being an abundant source of energy can be an efficient replacement / alternative to fossil fuel which is expensive, perishable as well as a major contributor to Global warming and environmental pollution. Currently the world is moving towards purchasing Power plant equipment that is incorporating advanced lean fuel combustion systems with low NO x emissions, in spite of their higher investment, operating & maintenance costs. It goes without saying that SRT projects are clean, green, efficient and safe to operate.

Under the above, I humbly appeal to the Honorable Commission for their kind consideration with regard to above submission and to continue the prevailing policies for the promotion of Solar Roof top Projects.

Sincerely,

Prabhakara Raju B V S.

Contact # 7893991991, Alternate Phone # 9542021731

APEPDCL Service # : 1533583100021712

UID: 25914336

Aadhar # 4821 2170 4736

Residence Address:

H No. 4-1/1-4/1, Sundaravaari Street,

Ward # 6, Narsapuram, West Godavari district.

Andhra Pradesh - 534275

Attachments:

1. NREDCAP agreement copy.

2. Electricity Bills reflecting CF export amount



2_Electricity bills_21712.pdf 6_NREDCAP_agreement.py.pdf

From: thimmanna_m@rediffmail.com
Subject: Comments on amendments to modalities for implementing SRP 2018
Date: March 23, 2020 at 11:27 AM
To: Commission Secretary commn-secy@aperc.gov.in

23/3/2020

To, The Secretary, A.P. Electricity Regulatory Commission, 4 th Floor, Singareni Bhavan, Red Hills, Lakdi ka pool, Hyderabad – 500 004	From, M. Thimma Reddy, Convenor, People's Monitoring Group on Electricity Regulation, 139, Kakatiya Nagar, Hyderabad – 500 008
--	--

Date: 23-03-2020

Respected Sir,

Sub: - Comments on Amendment to Modalities (Guidelines) for implementing Solar Rooftop Policy, 2018.

Ref: - O.P. No: 8 of 2020, Public Notice dated 09-03-2020

1.1 The proposed amendments to the modalities for implementing the Solar Roof Top Policy, 2018 is aimed at reducing the “financial burden which is resulting out of the Solar Rooftop power generation.” This is a part of APDISCOMs’ scheme/approach to discourage/bring down renewable energy (RE) generation, which is evident from their ARR and tariff proposal filings for FY 2020-21, which no doubt is misplaced and needs to be set aside. At present surplus power injected in to the grid from rooftop solar power plants is being paid at average pooled power purchase cost. An examination of power purchase costs from different sources show that the average pooled power purchase cost is high due to high cost of power procured from coal based thermal power plants and cost of RE power is lower than coal based thermal power plants. Table 27 (p.97) of the APERC’s Retail Supply tariff Order for FY 2020-21 provides an overall picture of power procurement cost in Andhra Pradesh (AP). While average power purchase cost is Rs. 4.68 per unit average cost of NCE is Rs. 4.58 per unit. If biomass power is excluded from NCE average cost of NCE will be even lower. At the same time average cost of APGENCO thermal total is Rs. 4.83 per unit. Cost of power from NTPPS V Stage and SDSTPP II is Rs. 4.94 per unit, that of SDSTPP I is Rs. 5.11 per unit and that of RTPP Stage IV is Rs. 5.46 per unit. What is more intriguing is that cost of thermal power blended with solar power in order to bring down cost of solar power under JNNNSM is higher (Rs. 5.62 and Rs. 4.73 per unit) than average cost of NCE. It is also well known that new solar and wind power units are producing power at about Rs. 2.50 per unit. Cost of solar and wind power is half of the power generated from new coal based thermal power plants. As is evident from the above Table of APERC Order average pooled power purchase cost can be considerably reduced by encouraging RE, particularly solar and wind power units and discouraging new coal based thermal power plants.

2.1 As a part of the present amendment proposals APDISCOMs want the Commission to permit only Gross metering and do away with Net metering. This goes against the GoAP’s new policy which left the choice to the consumers.

2.2 APDISCOMs allege that the present net metering and payment to solar power at average pooled power purchase cost is leading to unnecessary enrichment of solar rooftop developers. Under net metering consumers will be paying to the DISCOMs for the power that they take from the DISCOMs according to the relevant slab. In case there was such unnecessary enrichment as contended by APDISCOMs there would have been

3/6/2020

rusn for installation of solar rooftop units. Until now total solar rooftop capacity in AP is only about 200 MW and this constitutes less than 4 percent of solar roof top capacity in the country. The amendments proposed by APDISCOMs will totally discourage electricity consumers in the state from adopting solar rooftop systems.

3.1 APDISCOMs also want to limit the SRT Agreement period to 10 years instead of 25 years. There is no sanction for this under the present Solar Rooftop policy of GoAP. Also, there is no precedent for this in the country. The recent tenders for solar power floated by the states of Gujarat and Kerala mentioned that PPA will be for a period of 25 years.

4.1 Following the new GoAP policy on rooftop solar power plants APDISCOMs want “the applicable tariff for solar rooftop projects for either net-metering/gross metering shall not exceed “difference of pooled variable cost and balancing cost” or the applicable tariff at the time of CoD whichever is less”

APDISCOMs also proposed, “... It is advisable to pay to SRP consumers at reasonable price supported by cost plus calculations and should not unnecessarily enrich the SRP consumers at the cost of DISCOM consumers” (Para 6, APSPDCL petition).

“... Here, in cases of SRP plants, the tariff is not fixed on scientific basis and not supported by any logic or reason.” (Para 8, APSPDCL petition).

“... a Generic tariff may be fixed based on the costs involved instead of making payment based on Average Pooled Power Purchase cost...” (Para 11, APSPDCL petition).

4.2 Under the present conditions Average Pooled Power Purchase cost may not be an ideal index to set tariff for rooftop solar power units. This applies to linking it to average pooled variable cost also. Fluctuations in variable charges (prices of coal and natural gas) do not provide a stable environment for setting up SRP units. The formula for setting SRP tariff proposed in the GoAP GO and proposed by APDISCOMs in their petitions is loaded against SRP units and in favour of thermal power plants, going against the spirit of promoting renewable energy units even when techno-economic conditions favour RE sources like solar power units. Under this formula SRP units will be allowed only if its cost is much less than the variable cost of thermal power units, let alone total cost of thermal power units.

4.3 Going by the power purchase cost allowed by the APERC for the FY 2020-21 (Table 27 of the Tariff Order) average pooled variable cost comes to Rs. 3.15 per unit.

APDISCOMs in their ARR and tariff proposals for FY 2020-21 stated balancing cost of RE units as Rs. 0.53 per unit. According to this tariff for SRP units has to be set at Rs. 2.62 per unit. On March 18, 2020 Gujarat’s DISCOM – GUVNL – conducted bids for solar power and successful bids were in the range of Rs. 2.61 to Rs. 2.64 per unit. While this price may be economical for large scale solar units it may not be economical for small scale units like SRP. As such solar tariff emerging out of the above formula may not be economical and attractive for SRPs. There is need for developing an alternative formula or method for setting tariffs for SRPs.

4.4.1 As mentioned above APDISCOMs also proposed reasonable price supported by cost plus calculations and a Generic tariff based on the costs involved. In the past the Commission fixed feed in tariff (FIT) for solar units based on cost plus principle. But because of issues related to access to reliable data in the past FIT also faced criticism. Tariff for SRP may be linked to the latest tariff discovered in auction for solar units. As small developers and households do not have the capacity to compete with the price set by large developers they may be given an incentive over and above the price discovered

in the auction for large scale solar units. The GERC order in case no 1802 of 2019 has approved the mechanism of applicable tariff for purchase of power under the Government of Gujarat Policy for development of Small Scale Distributed Solar Projects – 2019. This is 20 paise/kWh higher than the tariff discovered through competitive bidding for large projects. This is likely to interest small investors who are unable to participate in the large tenders. But the issue is whether the Rs.0.2/kWh higher rate would be viable for these small projects like SRPs has to be examined.

4.4.2 Experience in Maharashtra suggests that the discovered prices for the solar feeder initiative is between Rs 3.1-3.3/kWh. Other states like Rajasthan and Haryana have also set the ceiling rate at Rs 3.11-3.14/kWh. The tariff for SRP units needs to be set in such a way that it is economical and attractive to SRP consumers and at the same time will not burden other DISCOM consumers.

5.1 The GoI has set the target of 100 GW of solar power by 2022. Out of this 40% i.e., 40 GW has to come from solar rooftop units. 2700 MW of solar power is available in AP during 2020-21. Following the all India target for solar rooftop units there should have been 1,800 MW solar rooftop units in AP. But present total capacity under solar rooftop units in AP is about 200 MW only. AP has achieved only 11% of the target. Solar rooftop units should have been the most preferred mode for promotion of solar power units. Solar power units need four times more land than thermal power plants. By promoting solar rooftop plants need for this land can be obviated. As power is generated at the point of consumption under SRP, T&D losses will be minimised. In spite of these advantages progress in SRP installation in AP is not encouraging. This trend in AP in particular and in the country in general goes against the global trend. SRP systems account for 70 per cent of total solar power capacity in Germany, 57 per cent in Australia, 50 per cent in Brazil, and 36 per cent in USA.

5.2 Renewable Power Purchase Obligations (RPPO) was introduced to promote renewable power in the context of climate change and global warming and at a time when cost of renewable power was high compared to conventional, thermal power sources. When cost of renewable sources, particularly solar and wind, is coming down the opportunity needs to be utilised with vigour. Instead, APDISCOMs prefer to jettison the opportunity. APDISCOMs stance is akin to throwing baby out along with bath water. Hope better sense will prevail with APDISCOMs and request the Commission not to give consent to the present petitions of APDISCOMs.

We request the Commission to take our above submission on record.

Thanking you.

Yours sincerely,

M. Thimma Reddy.

Email**commn-secy@aperc.gov.in****solar net metering**~~6/19/2020
Jas~~

From : cexide@gmail.com
Subject : solar net metering
To : Commission Secretary <commn-secy@aperc.gov.in>

Thu, Mar 19, 2020 09:40 AM

**Respected Sir,**

In response to the Public Notice dated 09.03.2020 of the Hon'ble APERC on the proposed Amendments to Modalities (Guidelines) for implementing Solar Rooftop Policy,2018,

1. **Surprisingly, APDISCOMs have proposed additional amendments to the policy guidelines over and above the amendments notified by GoAP vide GO Ms No 35 dated 18.11.2019, which will virtually kill the program.** This is entirely contrary to the Phase-II guidelines of MNRE wherein the DISCOMs are given responsibility of large scale promotion of the SRT projects.
2. The following are the additional amendments proposed by the DISCOMs contrary to the Government Orders, which are to be summarily rejected by the Hon'ble Commission,
3. To limit the SRT Agreement period to 10 years instead of 25 years.
4. Allowing only Gross metering and applicable tariff for both Net metering and Gross metering shall not exceed difference of pooled variable cost and balancing cost(or) applicable tariff at the time of COD ,whichever is less.
5. We wish to express our deep concern with the proposal for above amendments and no one will be interested to setup the solar power plant if the proposal is considered and would ultimately kill the program. Further, MNRE has issued the Phase-II program guidelines to implement the program by DISCOMs. Instead of proposing the various measures for promotion , DISCOMs have proposed retarding guidelines to demote the program which are contrary to the MNRE guidelines and depriving the benefit to the General Public.

6. The proposals of the DISCOMs are detrimental to the interests of the Public and not their interest as indicated in their petition.]

7. We wish to submit that subsidies for the solar power plant under Net Metering scheme are removed except to the domestic consumers. Hence, Solar Roof Top projects setup with bank finance with interest rate of 12%, will take at least 10 to 12 years to achieve breakeven. Thus, any benefit from the solar roof top power system can be realized only after 12 years and limiting of the SRT agreement period for 10 years, will be a big setback and no one will show interest to setup the projects. Hence, the SRT Agreement should be continued for 25 years as per the existing policy.

8. In Gross metering system, DISCOMS will pay for the Net Exported units based on the Average Pooled Purchase cost (Rs.3.75/Unit). The DISCOMs have proposed that the "Difference of Pooled Purchase Cost and Balancing Cost (Rs. 3.50/Unit) should be paid for the Net Exported units". So, the net amount payable is just Rs. 0.25 Paisa Per Unit. Considering a domestic consumer who installs 1 KWp Solar power system, the system generates 5 units per day. Assuming that total consumption in the morning hours is 2 units per day, the Net exported units per day is 3 Units per day. Total exported units per month is 90 Units. If the DISCOM pays Rs.22.50 (90 units X Rs 0.25/Unit) per month to the consumer, the break-even period for the solar power system is more than 40 years.

In this kind of scenario, it is big loss to the consumer and no one will setup the solar Roof Top power system.

We pray to the Honourable Commission to continue the prevailing guidelines for promotion of Net Metering for the benefit of the consumers and for the benefit of the environment.

Thanking you

Email**commn-secy@aperc.gov.in****solar net metering**~~6/18/2020
10:03~~

From : sasolarsystems@gmail.com
Subject : solar net metering
To : Commission Secretary <commn-secy@aperc.gov.in>

Thu, Mar 19, 2020 09:36 AM

**Respected Sir,**

In response to the Public Notice dated 09.03.2020 of the Hon'ble APERC on the proposed Amendments to Modalities (Guidelines) for implementing Solar Rooftop Policy,2018, we submit hereunder our representation for kind consideration the recent solar policy got released few months back and again discoms are proposing the amendments which are literally killing solar industry .

1. We wish to bring to the kind notice of the Hon'ble Commission that all the States are promoting Net Metering in a big way. No state in India has removed Net metering policy.

Gross metering is a big failure and it is not useful for customers.

19/03

- Government of Karnataka has increased the subsidies for Net Metering in the notification dated 15.03.2020 to the extent of 40% for the domestic consumers.
- Maharashtra ERC has rejected the proposal of DISCOMS for Removing the Net Metering
- Rajasthan and UP Governments have increased the max capacity of the Net Metering systems to 2 MWp at single location.
- UP Government is extending State Subsidy of Rs.15,000 to Rs.30,000 for domestic consumers.
- Gujarat Government has allotted addition fund in the budget for FY 2020-21 to promote Group Captive Solar Roof top installations in domestic sector. More than 400 MW Solar Roof Top projects have already been implemented in the State.
- Goa Government is extending 20% State Subsidy.

*6/20
19/3/2020*