

Rajasthan Electricity Regulatory Commission

Petition No. RERC-1793/20

Petition filed under Section 20 of RERC (connectivity and Net Metering for rooftop and small solar grid interactive systems) Regulations, 2015 read with Section 66, 86(1)(k) and 181 of the Electricity Act, 2003 seeking necessary amendments in said Regulations.

Coram:

Shri Shreemat Pandey, Chairman
Shri S.C. Dinkar, Member
Shri Prithvi Raj, Member

Petitioners : 1. Jaipur Vidyut Vitran Nigam Ltd.
2. Ajmer Vidyut Vitran Nigam Ltd.
3. Jodhpur Vidyut Vitran Nigam Ltd.

Date of hearing : 22.10.2020 and 27.10.2020.

Present : Sh. Sandeep Pathak, Advocate for Petitioners

Order Date: 07.12.2020

ORDER

1. Petitioners, Jaipur Vidyut Vitran Nigam Ltd., Ajmer Vidyut Vitran Nigam Ltd. and Jodhpur Vidyut Vitran Nigam Ltd. (collectively called 'Discoms') have filed this petition on 11.08.2020 under Regulation 20 of RERC (Connectivity and Net Metering for Rooftop and Small Solar Grid Interactive Systems) Regulations, 2015 (RERC Net Metering Regulations, 2015) read with Section 66, 86(1)(k) and 181 of the Electricity Act, 2003 seeking amendments in said RERC Net Metering Regulations, 2015.

2. The matter was finally heard on 27.10.2020. Sh. Sandeep Pathak, Advocate appeared for Petitioners and made submissions as under:
 - 2.1. RERC Net Metering Regulations, 2015 are framed to regulate various aspects regarding setting up of a rooftop solar plant or a small solar system for self-consumption, procedure, rights and duties of the consumers to avail net metering facility from the Petitioners for such installations.
 - 2.2. Petitioners, to resolve the operational and functional difficulties to all stakeholders, prayed for following amendments in the RERC Net Metering Regulations, 2015.
 - 1) Capping on distribution transformer capacity (upto 50%) for solar consumers who install their own distribution transformer
 - a) Regulation 5 of RERC Net Metering Regulations, 2015 provides that the total cumulative capacity of rooftop solar installations allowed in a particular distribution transformer should not exceed 30% of the capacity of the DTR capacity. Further, Commission vide order dated 05.03.2020, increased the capping limit of 30% to 50%.
 - b) Regulation 5 is applicable to those consumers who are connected to distribution transformers owned by the Discoms. This clause does not specify the applicability of the capping for HT consumers who have set-up their own distribution transformer.
 - c) The capping on the cumulative capacity of solar installations in particular is essential to ensure that the distribution transformer of the Discoms may not be overloaded and quality of supply can be maintained for consumers who are connected to the same distribution transformer, apart from those using solar rooftop installations.
 - d) Therefore, for HT consumers who set-up their own distribution transformers,

capping of 50% becomes irrelevant. Infact, for such consumers as per Regulation 6(2) of RERC Net Metering Regulations, 2015, maximum Rooftop PV Solar Power Plant capacity should not be more than 80% of the sanctioned connected load/contract demand.

- e) In light of the above facts, Petitioners prayed to make the following amendment in Regulation 5 (1) of RERC Net Metering Regulations 2015:

"5. Connectivity of Roof Top PV Solar Power Plants

(1) The cumulative capacity to be allowed at a particular distribution transformer shall not exceed 50% of the capacity of the distribution transformer:

Provided that in case of HT consumers where the Distribution transformer has been installed by the consumer itself, the 50% capping shall not be applicable. The total allowable solar installation capacity for such consumers shall be as per regulation 6 (2) of these regulations"

- 2) Application fees for consumers connected at 132 kV level and above
- a) RERC Net Metering Regulations, 2015 not prescribed the application fees for net metering connection at 132 kV level and above.
- b) Therefore, Commission may make necessary amendments in RERC Net Metering Regulations, 2015 and prescribe application fees at 132 kV level and above.
- 3) Solarisation of street lights in village and Gram Panchayats of Rajasthan under Shyama Prasad Mukherjee Rural Urban Mission Scheme (SPMRM)
- a) Government of India has launched the Shayam Prasad Mukherjee Rural Urban Mission (SPMRM) on 21.02.2016 with the vision of development of a cluster of villages that preserve and nurture the essence of rural community life with focus on equity and inclusiveness without compromising with the facilities perceived to be essentially urban in

nature.

- b) As per the requests of the Panchayati Raj and Rural Development Department, Government of Rajasthan, it is requested to make necessary amendments in RERC Net Metering Regulations, 2015 so as to give effect to the decision for inclusion of street lights to be solaried under the Shayam Prasad Mukherjee Rural Urban Mission.
- 4) Facility of Banking and payment of surplus energy by Discoms under Net Metering Regulations to be extended to Government establishments like offices, schools, colleges, hospitals and its other buildings.
- a) Rajasthan Solar Energy Policy, 2019, provides that the benefits under Net Metering scheme as applicable to domestic consumers, such as banking facility and payment of surplus energy by Discoms, will also be applicable to Government offices, Government schools, Government colleges, Government hospitals and any other Government buildings notified by State Government under the Net Metering scheme. The Commission, vide its order dated 05.03.2020, has taken due cognizance of the matter and directed the Discoms to implement the same.
- b) Therefore, Commission may make suitable amendments to the RERC Net Metering Regulations, 2015 so as to include the provision for banking and payment of excess energy injected for solar installations in Government offices, Government schools, Government colleges, Government hospitals and any other Government buildings notified by State Government under the Net Metering scheme. It may be considered that the settlement of excess energy and banking should be directed to be as per Regulation 10 (3) of RERC Net Metering Regulations, 2015.
- 5) Tariff for sale of the power generated from the solar rooftop systems and supplying power to the Discoms under Gross Metering scheme

- a) The Commission, vide order dated 05.03.2020, has directed the Discoms to explore the feasibility of Gross Metering arrangement for consumers having solar rooftop systems. Petitioners are aware of the fact that with the increase in solar rooftop capacity year by year, it is the appropriate time to explore the option of providing connections to consumers with Solar Rooftop Systems with Gross Metering facility.
- b) Energy injected by such consumers shall contribute to RPO compliance of Discoms and at the same time would lead to better forecasting of cost of intermittent solar energy.
- c) One of the key parameters of gross metering is energy accounting and settlement of energy injected into the grid by such consumers. This shall have significant financial implication on Discoms, since the penetration of rooftop solar systems has been on rise in Rajasthan. The Discoms would pay such consumers as per tariffs as determined by the Commission.
- d) In this regard, Petitioners after exploring the prevailing practice of energy accounting and settlement pertaining to Gross Metering facilities in other States of the country like Uttar Pradesh, Delhi and Andhra Pradesh proposed that the settlement of energy injected into the grid by consumers opting for Gross Metering should be done at the end of the same month and the tariff payable by Discoms for such energy should be equal to Average Power Purchase Cost (APPC) of power procured in the previous financial year in the power procurement portfolio of Discoms.
- 6) Connectivity level of rooftop solar systems with the grid.
 - a) Presently Regulation 9(2) of RERC Net Metering Regulations 2015 provides that the connectivity level at which the rooftop PV Solar power plants shall be connected with the grid. But Petitioners face difficulties in their operations while implementation of the said Regulations, therefore, for

better clarification for the connectivity level of such consumers, the following clause may kindly be added in Regulation 9(2).

“For HT (11 kV and above): Consumers may install and connect Renewable Energy Generating System at their LT Bus Bar System:

Provided that, in such cases, the Net Meter shall be installed on the HT side of the Consumer’s Transformer.”

7) Metering arrangement for consumers not opting for Net Metering arrangement

a) At present, the Net Metering Regulations, 2015 do not cover consumers who install solar PV systems in their premises but do not opt for Net Metering arrangement with Discoms. Such consumers do not install solar meters with due intimation to the Discoms for which the Discoms is unable to ensure that the necessary technical standards are meet or not. Such meters may have negative repercussions for the grid as the meters are not verified for their technical standards.

b) Referring to the Maharashtra Electricity Regulatory Commission (Grid Interactive Rooftop Renewable Energy Generating Systems) Regulations, 2019, following clause is proposed to be added to the RERC Net Metering Regulations.

“Grid Connected Renewable Energy Generating Systems connected behind the Consumer’s meter, and not opting for Net Metering Arrangement shall be allowed only after prior intimation to the respective Distribution Licensee.

Provided that the Consumer shall be responsible for ensuring that all necessary safeguarding measures as specified by Central Electricity Authority (CEA) are taken.

Provided also that in case the consumer installs Renewable Energy Generating Systems with an energy meter without prior intimation to the respective Distribution Licensee, then the total additional liabilities shall be levied at the rate of fixed charges for one month, applicable as per the tariff order of Discoms for the relevant consumer category”

2.3. In light of above submissions, it is prayed to admit and approve the petition to make appropriate amendments, addition and changes in RERC (Connectivity and Net Metering for Rooftop and Small Solar Grid Interactive Systems) Regulations, 2015.

Commission's view

3. Commission has considered all the submissions made on behalf of the Petitioners.
4. Commission observes that the Petitioners have requested to initiate the proceedings to amend the RERC (Connectivity and Net Metering for Rooftop and Small Solar Grid Interactive Systems) Regulations, 2015 based on facts submitted in the petition.
5. Commission, at this juncture, deems it appropriate that proposal of amendment in RERC Net Metering Regulations, 2015 shall be considered as and when it initiates amendment in said Regulations after following the prescribed procedure.
6. Accordingly, Commission has noted the suggestions of the Petitioner regarding amendment in RERC Net Metering Regulations, 2015. As and when Commission initiates the process for amendment in the matter, it would treat the proposal of Petitioners as a suggestion/input. However, Petitioner should also give more inputs when Commission invites comments/suggestions on the draft amendment in RERC (Connectivity and Net Metering for Rooftop and Small Solar Grid Interactive Systems) Regulations, 2015.
7. The petition stands disposed of accordingly

(Prithvi Raj)
Member

(S.C. Dinkar)
Member

(Shreemat Pandey)
Chairman