



NATIONAL SOLAR ENERGY FEDERATION OF INDIA

Regd. No. 362 / IV of 8 May, 2013

भारतीय सौर ऊर्जा महासंघ

पंजीकरण नं 362 / IV - 8 मई, 2013

Pranav R Mehta
Chairman

Ref.:-NSEFI/GOG/2020-21/154

Date: 03.02.2020

To

Shri Saurabhbhai Patel
Hon'ble Energy Minister,
Government of Gujarat

Sub.: Suggestion on Solar Power Policy 2021 dated 29.12.2020.

Dear Sir,

National Solar Energy Federation of India (NSEFI) is a non-profit organization with the objective of solar power development. It is an umbrella organization representing solar energy companies active along the whole photovoltaic value chain: project developers, manufacturers, engineering companies, financing institutions and other stakeholders. NSEFI is founded in 2013 by solar energy industry leaders with the vision to promote solar energy, NSEFI is a public trust based in New Delhi.

The Government of India (GoI) has been striving towards providing clean, affordable and sustainable energy in the country. In this direction, the Government of India has setup the ambitious goal of developing 225 GW of Renewable power capacity by 2022 and 450 GW by 2030.

The Government of Gujarat is playing a key role in achieving GOI commitment by setting up a target of 30,000 MW of renewable energy generation by 2022. At present, the state has a total Solar power generation capacity of about 4000 MW.

We take this opportunity to appreciate and welcome the Government of Gujarat Solar Power Policy 2021, where the Capacity Restriction of 50% of Contracted Demand has been withdrawn. However to promote the adoption of Solar power in the state, on behalf of our members we would like to submit following suggestions to further boost and attract investment in the Solar Power sector.

1. Rationalization of Banking charges

Under current Solar Power Policy 2021, Banking charges at rate of Rs. 1.50/kwh of Banked power is levied over and above the Fixed charges as per Contracted/Sanctioned load and Open access charges and losses.

HT consumers are levied with Fixed charges costing more than Rs. 1.0/kwh and Transmission Charges of about Rs. 0.60/kwh.



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Burdening HT consumers with additional Banking charges makes Captive or Third party Solar power project unviable, as against 2% Banking charges levied in kind earlier.

Request

We request Government of Gujarat to continue with levy of Banking charges @ 2% of Banked energy in kind.

2. Requirement of 100% Equity of Consumers for Captive status

This definition in the Solar Policy is in contradiction with the Electricity Rule 2005, which restrict the minimum requirement of equity to 26% in the Power plant for the Captive status.

Request

We request Government of Gujarat to adopt the requirement under Central Governments, Electricity Rule, 2005 of 26% equity in the Power plant for Captive Status

3. Increase the Banking window from 7:00 Hrs - 18:00 Hrs to Annual Billing Cycle

Due to infirm nature of Solar power and Seasonal variation in generation, Banking should be allowed annually instead of 11 Hrs allowed in a day. Also many Industrial consumers have demand which is infirm in nature and varies through out the year depending on the consumption patter, Market condition, Seasonality etc.

Request

Allow annual Banking with the additional Banking charges

4. Clarification with regards to definition of Premise under Roof top net metering.

Further clarification is requested, wherein the premise owned by consumer, which is not under the same boundary wall but is nearby and which has been physically separated due to Road or physical obstructions.

Request

Allow the Solar power plant under Roof net metering at the premise of the Consumer which is not within the premise where connection is taken however can be connected through underground cables.

We would like to draw your attention towards recent order of Hon'ble APTEL dated 28.01.2021, wherein Tribunal has set aside the TNERC order withdrawing the Banking facility, levy of additional Banking charges, increase of Cross-subsidy charges, increase of Open access charges, imposition of other system charges. Hon'ble Tribunal in its order cited below in this regard.



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“We would not allow further ad hoc approach on the subject. We, thus, also direct that the State Commission shall not bring about changes in the rules for power banking (of the kind attempted through the non-speaking impugned decision) by any further order without undertaking a study based on requisite data properly gathered and analysed so as to draw informed conclusions about financial impact on various stakeholders. We are given to understand that there is sufficient time available for such study before the time for issuing fresh order on the subject for the next control period arrives. The work in this regard, thus, must begin forthwith and in right earnest. All stakeholders shall be duty-bound to cooperate for making the endeavour meaningful.”

In view of above we request Government of Gujarat to adopt rational approach instead of such Adhoc banking mechanism and issue suitable amendment/clarification on the above mentioned provisions of the Solar Policy, to not only promote the Solar power in the state but also reduction in the Electricity cost to Industries. This will not only further promote investment in the Manufacturing Industry, but generate employment in the state and revenue to exchequer in the form on Direct and Indirect tax's.

We look forward to your positive consideration in the matter.

Thanking You

With Best Regards,

**Pranav R Mehta
Chairman, NSEFI**

CC:

1. Chief Secretary, CM office, Govt. of Gujarat.
2. ACS, EPD, Govt. of Gujarat.
3. Hon'ble Chairman, GERC.