



# 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

Ref no: NSEFI/TNERC/2024-25/0101 (R)

Date: 20.01.2025

To,

**The Commission Secretary,  
Telangana Electricity Regulatory Commission,  
Vidyut Niyamtran Bhavan, G.T.S. Colony, Kalyan Nagar,  
Hyderabad- 500045.**

**Subject:** Stakeholder's comments on proposal (by TGSPDCL & TGNPDCL) on Amendment of model Solar PPA

**Ref:** TSERC notice on OP 33 of 2024, D. No. 843

Respected Sir,

**Greetings from National Solar Energy Federation of India (NSEFI)!**

NSEFI is a non-profit organization with the objective of Renewable power development. It is an umbrella organization representing Renewable Energy companies active along the whole photovoltaic value chain: project developers, manufacturers, engineering companies, financing institutions and other stakeholders. The organization was founded in 2013 with the vision to promote renewable energy. Our members have executed Solar as well as Wind power projects across the country, under the State and Central Schemes across India.

**With reference to your notice cited at reference cited above wherein the comments have been invited on or before 20.01.2025 by 5:00 PM, we hereby submit our comments/ Suggestion on behalf of our members to the proposed amendment in model PPA by TGSPDCL & TGNPDCL as below:**

S. No.	Article	Existing	Amended	Remarks/Objections/Comments
1.	2.6	The Solar Power Developer is entitled to draw the power	The Solar Power Developer is entitled to draw the power from the DISCOM for its	Given fixed tariff for 25 years was calculated based on the existing PPA clause for adjusting all imports from delivered energy at quoted tariff.

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from the DISCOM for its auxiliary consumption, subject to limit as specified in Schedule-1. The energy supplied by the DISCOM to the Solar Power Developer through a bilateral arrangement, to maintain the Auxiliaries of the power plant in situations of non-generation of power, in any billing month shall be adjusted from the delivered energy, as indicated below:

**Net Energy = Delivered energy by the developer at interconnection point Energy drawl from DISCOM for auxiliaries.**

Provided that where there is NO Delivered Energy by the SPD at the Interconnection Point in any month, then Energy drawl from the DISCOM shall be billed at the applicable tariff of HT-1 category consumers. Provided further that the Solar plants during the plant shut down or non-generation

auxiliary consumption, subject to limit as specified in Schedule-1. The energy supplied by the DISCOM to the Solar Power Developer through a bilateral arrangement, to maintain the auxiliaries of the power plant in situations of non-generation of power, shall be adjusted as indicated below:

**Net Energy = Delivered energy by the project at interconnection point-Energy drawl from DISCOM for auxiliaries\***

\*Here, Energy drawl from DISCOM for Auxiliary consumption as specified in Schedule 1 of this Agreement.

Provided that where the consumption drawn from the DISCOM is over and above the auxiliary limit specified in Schedule 1 of this Agreement, such excess consumption shall be billed on KVAh basis at the applicable tariff of HT-1 category consumers as notified by the TGERC for the relevant financial year.

Provided further that during the plant shut down or non-generation periods, the project shall draw the energy from the DISCOM only for the essential loads not exceeding the auxiliary consumption limit as specified in Schedule 1 of this

Hence, demanding payments for imported energy on the basis HT-1 billing i.e on KVAh would lead to extra cost on the generator company as the same was not accounted for in the fixed PPA tariff.

The imported power is being utilized for the following reasons which are beyond the control of the generator:

1. The Auxiliary power is imported during night to meet our plant auxiliary loads like Keeping up SLDC communication, SCADA, plant protection system.
2. During Winter months the auxiliary consumption generally goes up due to low generation hours as the daytime is shorter than the night time.
3. The Power factor variations and reactive power are due to grid issues and not attributable to us and beyond our control.
4. Sometimes generators are compelled to import power during daytime due to problems from Grid and departmental restrictions beyond our control.
5. The generators are importing power only for lighting and for maintaining Auxiliary and Communication system to SLDC during night (and the ABT meters have been installed accordingly) and during plant shut down due to unavoidable faults by grid and grid induced breakdowns and force majeure condition beyond the generator's control.
6. SLDC has been asking to maintain communication on round the clock basis



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periods shall draw the energy from the DISCOM only for the essential loads not exceeding the auxiliary consumption.

Agreement.

Provided that where there is NO Delivery Energy by the SPD at the Interconnection Point in any month, then Energy drawl from the DISCOM shall be billed on KVAh basis at the applicable tariff of HT-1 category consumers as notified by the TGERC for the relevant financial year.

**As such the TGSPDCL proposal for penalizing us by imposing HT tariffs for grid induced issues of power factor and reactive power and KVAh based billing cannot be accepted.**

We have been successful and trying our best in limiting our consumption within the permissible limits as per PPA.

**It is therefore a humble request that the proposed amendment must not be made applicable for the existing PPAs.**

Thank you for your kind attention to this matter. We are sure that these feedback from our members would be invaluable in refining the model Solar PPA in the state, and ensuring they meet the sector's evolving needs.

With Best Regards,



**Subrahmanyam Pulipaka**  
Chief Executive Officer  
National Solar Energy Federation of India