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To
The Secretary,
Telangana Electricity Regulatory Commission,
Vidyut Niyantran Bhavan, Sy.No.145-P, GTS Colony,
Kalyan Nagar, Hyderabad – 500045

Subject: Submission of Comments/suggestions/objections on the Draft TGERC (Rooftop Solar PV Grid Interactive Systems) Regulation, 2025.

Respected Sir,

We thank the Hon'ble Commission for providing the opportunity to submit comments and suggestions on the Draft Telangana Electricity Regulatory Commission (Rooftop Solar PV Grid Interactive Systems) Regulation, 2025 notified on 14.08.2025.

After careful examination of the draft provisions, we are hereby submitting our comments/objections and suggestions in the prescribed tabular format. The same is enclosed herewith for the kind consideration of the Hon'ble Commission.

We respectfully request that our views may kindly be considered while finalizing the final Regulation, as these will promote higher renewable energy adoption in the State.

Yours faithfully,

FOURTH PARTNER ENERGY PVT. LTD.

(**Paila. Venkata Ramana**)

From :
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Partnering for Sustainable Change

Comments/Objections/Suggestions on Draft TGERC (Rooftop Solar PV Grid-Interactive Systems) Regulation, 2025

Sl. No.	Clause	Existing Clause in Draft Regulation	Views / Suggestions	Justification
1	4.2, 4.3, 4.5	**Clause 4.2:** "The eligible consumers of all categories may install the Rooftop Solar PV System under the Net Metering Arrangement up to 500(Five Hundred) kW capacity…" **Clause 4.3:** "The eligible consumers of all categories may install the Rooftop Solar PV System under Group Net Metering Arrangement for less than 100 (One Hundred) kW capacity. **4.4.** The eligible consumer of all categories may install the Rooftop Solar PV System under the Gross Metering Arrangement up to 1 (one) MW capacity. **Clause 4.5:** The eligible consumer of all categories may install the Rooftop Solar PV System under the Virtual Net Metering Arrangement for less than 100 (One Hundred) kW capacity.	Request to incorporate Net Billing as a third option along with Net Metering and Gross Metering up to CMD / SD For Industrial, Commercial and Other consumers.	The Net Billing provisions defined and mandated under the *Electricity (Rights of Consumers) Rules, 2020* have been completely omitted in the draft regulations. In order to align with the central rules and to provide prosumers with flexibility, we request the Hon'ble Commission to incorporate *Net Billing* as a third option in addition to *Net Metering* and *Gross Metering*.
2	4.2	"The eligible consumers of all categories may install the Rooftop Solar PV System under the Net Metering Arrangement up to 500(Five Hundred) kW capacity…"	Enhancement of Net Metering capacity to 1 MWp as followed by the current policy (regulation no:06 of 2016).	As per Section 86(1)(e) of the *Electricity Act, 2003*, one of the key functions of the State Commissions is the promotion of renewable energy. In this context, relaxing the capacity will encourage higher rooftop adoption & adding more green footprints and reducing the utilization of Fossil fuel consumption in state Energy conservation.
3	4.3 & 4.5	**Clause 4.3:** "The eligible consumers of all categories may install the Rooftop Solar PV System under Group Net Metering Arrangement for less than 100 (One Hundred) kW capacity. **Clause 4.5:** The eligible consumer of all categories may install the Rooftop Solar PV System under the Virtual Net Metering Arrangement for less than 100 (One Hundred) kW capacity.	Enhancement of GNM and VNM capacity limits to 1 MWp / up to CMD / SD For Industrial, Commercial and Other consumers. And, Request to permit In House Captive Rooftop Solar Plants for self-consumption.	The current 100 kWp restriction is too low and discourages collective adoption by housing societies, institutions, and commercial establishments. Increasing to 1 MWp will support scaling up more renewable adoption.

4	4(4.9) (i)b	For Industrial, Commercial and Other consumers: upto a maximum of 80% of sanctioned load/contracted demand of the consumer	For Industrial, Commercial and Other consumers: up to a maximum of 100% of sanctioned load/contracted demand should be in equivalent kW instead of kWp	The maximum Rooftop Solar PV capacity under Net Metering, Gross Metering, and Behind-the-Meter installations at any eligible consumer's premises should be allowed up to 100% of sanctioned load/contracted demand in equivalent kW (instead of kWp). This will maximize rooftop potential and support higher renewable adoption.
5	4.11 & 4.12	The eligible consumers having Net Metering Arrangement or Gross Metering Arrangement under these regulations shall not be entitled to avail the facility of Open Access under TGERC Terms and Conditions of Open Access, Regulation 2024 and subsequent amendments from time to time. **Clause 4.12:** The eligible parent consumers/ prosumers under Group Net Metering and Virtual Net Metering Arrangements under these regulations shall also not be entitled to avail the facility of Open Access under TGERC Terms and Conditions of Open Access, Regulation 2024 and subsequent amendments from time to time:	Request to permit Open Access for consumers having Net Metering, Gross Metering, Captive Rooftop Solar Plants for self-consumption.	Restricting Open Access for the consumers having Net Metering Arrangement or Gross Metering Arrangement reduces renewable adoption. Allowing them flexibility will support GoI's 2030 target of 50% non-fossil capacity and accelerate rooftop solar penetration in the state.
6	2.1.ai	"Settlement Period" "means the period of one billing month at the end of which Net Metering, Group Net Metering, Gross Metering and Virtual Net Metering arrangement's settlement of the net credited units, between the Distribution Licensee and the prosumer takes place;	We request to retain the energy settlement as per the current policy (regulation no:06 of 2016).	Switching from the current half-yearly or annual settlement to monthly adjustments would negatively impact financial viability, particularly for seasonal industries and other similar consumers.