

Date: 05.09.2025

To,

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

**SUB- COMMENTS AND SUGGESTIONS IN THE MATTER OF DRAFT ROOFTOP
SOLAR PV GRID INTERACTIVE SYSTEMS REGULATION, 2025.**

Respected Sir,

We, Manikaran Power Limited ("MPL"), are a Category 1 trading licensee under Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of trading licensee and other related matters) Regulations, 2020.

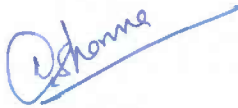
This is in reference to the Public Notice in the matter of Draft Rooftop Solar PV Grid Interactive Systems Regulation, 2025, Comments/ Suggestions on the draft regulation has been sought from the stakeholders.

In view of the same, we hereby submit our comments and suggestions on the proposed draft regulation(s).

We humbly request you to consider our comments and suggestions while finalizing the said amendments.

Thanking you,

For and behalf of Manikaran Power Limited,



Authorized Signatory



MANIKARAN POWER LIMITED

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MPL's comments and suggestions on Telangana Electricity Regulatory Commission (Rooftop Solar PV Grid Interactive Systems) Regulation, 2025.

Reg.	Proposed Amendment Regulation	MPL's Comments/ Suggestions/Objections
		Prayer: We respectfully submit the prayer to the Hon'ble Commission to introduce Scope of BTM Projects: Kindly include behind-the-meter (BTM) solar rooftop PV systems (e.g., captive consumption projects, hybrid projects with storage), with the condition that there shall be no export of electricity to the grid and that the consumer shall meet all the technical standards as decided by the Commission. Further, such BTM projects will require prior approval from the distribution licensee. The minimum capacity of such projects will be 1 kW but shall not exceed 1 MW or contract demand/sanctioned load of the consumer whichever is lesser.
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. Provided that existing prosumers who are already availing the facility of Net Metering and have installed capacity above 500 (Five Hundred) kW shall continue to get the benefit of net metering facility under these Regulations.	Suggestion: In the draft regulation, the Net Metering capacity limit for Rooftop Solar PV Systems has been restricted to 500 kW. However, in the earlier framework, Net Metering was permitted up to 1 MW. We request the Commission to kindly retain the earlier provision of allowing Net Metering up to 1 MW capacity, in line with previous regulations, to ensure continuity and encourage higher adoption of rooftop solar by large consumers.
4.8	The minimum size of the Rooftop Solar PV System that can be set up under Net Metering and Gross Metering arrangement would be 1 (one) kW. The minimum size of the Rooftop Solar PV System that can be set up under Group Net Metering and Virtual Net Metering arrangement would be 10 (Ten) kW. The minimum load of the prosumer/participating consumer/participating connection for setting up Net Metering, Group Net Metering, Gross Metering and Virtual Net Metering arrangement shall be 1 (one) kW.	Clarification: Minimum size for Net Metering / Gross Metering: 1 kW Minimum size for (GNM) /(VNM): 10 kW Minimum load requirement for all arrangements: 1 kW However, the regulation does not clearly mention the maximum capacity limit for GNM and VNM. Since the Net Metering cap is proposed at 500 kW (earlier 1 MW), it is unclear whether this same upper limit will also apply to GNM and VNM arrangements, or whether a separate capping will be prescribed.



		We request the Hon'ble Commission to kindly clarify the maximum permissible capacity under GNM and VNM, and if not specified separately, confirm whether the 500 kW limit (as for Net Metering) will be applicable.
4.9 (ii)	Group Net Metering: a) For residential and Government Consumers: shall not exceed the sum of Contracted Demands or Contracted loads or sanctioned loads of the parent consumer and the participating connections, put together. b) For Industrial, Commercial and Other consumers: up to a maximum of 80% of the sum of Contracted Demands or Contracted loads or sanctioned loads of the parent consumer and the participating connections, put together. Provided that in case of reduction in contracted capacity of parent/participating connection due to deration loads and if the contracted capacity of all the parent and participating consumers is less than the sanctioned solar rooftop capacity, the excess power injected proportionate to the reduction in capacity shall be treated as inadvertent power.	Clarification Required: Kindly clarify how the provision relating to reduction of contracted demand will be applied in the case of Group Net Metering (GNM) consumers. Specifically, when the contracted demand of the parent and/or participating consumers is reduced (derated). How the excess solar injection be calculated proportionate to the reduction capacity and later apportioned among the participating connections? Suggestion as an example: Say for industrial parent consumer with 4 participating consumers with total sanctioned load of 700 kW has installed SRTPV with sanctioned capacity of 500 kW. Now if the sanctioned load of the parent/participating connections reduces by 100, now Sanctioned load is the 600 KW & Maximum Solar Rooftop Capacity allowed as 80% of Sanctioned Load which comes to 480KW. If there is any excess injection above 480KW, then it should be treated as Inadvertent Power.
4.9 (iii)	Virtual Net Metering: a) For residential and Government Consumers: shall not exceed the sum of Contracted Demands or Contracted loads or sanctioned loads of the participating consumers, put together. b) For Industrial, Commercial and Other consumers: upto a maximum of 80% of the sum of Contracted Demands or Contracted loads or sanctioned loads of the participating consumers, put together. Provided that in case of reduction in contracted capacity of parent/participating consumer due to deration loads and if the contracted capacity of all the parent and participating consumers is less than the sanctioned solar rooftop capacity, the excess power injected proportionate to the reduction in capacity shall be treated as inadvertent power.	Clarification Required: Kindly clarify how the provision relating to reduction of contracted demand will be applied in the case of Virtual Net Metering (VNM) consumers. Specifically, when the contracted demand of the parent and/or participating consumers is reduced (derated), please clarify the treatment of excess solar injection be calculated and apportioned among the participating connections. Suggestion as an example: Say for industrial parent consumer with 4 participating consumers with total sanctioned load of 700 kW has installed SRTPV with sanctioned capacity of 500 kW. Now if the sanctioned load of the parent/participating connections reduces by 100, now Sanctioned load is the 600 KW & Maximum Solar Rooftop Capacity allowed as 80% of Sanctioned



		Load which comes to 480KW, if there is any excess injection above 480KW, then it should be treated as Inadvertent Power.
4.15	In case a Rooftop Solar PV System whether self-owned or leased by a Third Party Owner, is installed on prosumer premises under Group Net Metering arrangement, prosumer/ parent consumer and participating connection(s) shall be exempted from banking charges, cross subsidy surcharge and additional surcharge. Wheeling charges shall be applicable only on participating connections(s) as per the voltage level of the participating connection(s). Wheeling losses shall be applicable only on participating connection(s). Provided that the lower voltage level between the parent consumer's connection point and the participating consumers' connection points shall be considered as wheeling loss which is applicable for participating consumers	Prayer: We request the Hon'ble Commission to kindly exempt participating connections under Group Net Metering (GNM) from wheeling charges also and apply only wheeling losses.
4.16	In case a Rooftop Solar PV System whether self-owned or leased by a Third-Party Owner, is installed on prosumer premises under Virtual Net Metering, participating consumer(s) shall be exempted from banking charges. Cross subsidy surcharge and additional surcharge shall be applicable only on participating consumer(s) as per the provisions of TGERC Terms and Conditions of Open Access, Regulation 2024. Wheeling charges shall be applicable only on participating consumer(s) as per voltage level of the participating consumer(s). Wheeling losses shall be applicable only on participating consumer(s). Provided that the lower voltage level between the parent consumer's connection point and the participating consumers' connection points shall be considered as wheeling loss which is applicable for participating consumers.	Suggestion: It is further requested that the Commission may kindly consider exempting participating consumer(s) under Virtual Net metering (VNM) from wheeling charges, cross subsidy surcharge and additional surcharge in such cases to promote the green energy in the state. Rationale behind the suggestion: Levying cross subsidy surcharge, additional surcharge and wheeling charges on participating consumers under VNM is similar to like availing power under third party open access arrangement which will not benefit the participating consumers a great deal given the existing open access charges in the state and may likely discourage VNM installation.
8.1.3 (b)	If the quantum of electricity units imported by the prosumer during any Billing Period exceeds the quantum of electricity units exported, the Distribution Licensee shall raise its invoice for the electricity consumption after adjusting the credited units: Provided that in case, where the prosumer is under HT category, the electricity consumption in any time block (e.g., peak hours, off-peak hours, etc.) shall be first compensated with the electricity exported in the same time block. Any cumulative excess exported electricity over and above the consumption in any other time block in a billing	Suggestion: We respectfully submit the following modification for consideration: Time block wise adjustment – Consumption in each time block should netted off with Time block wise generation after accounting the wheeling loss Monthly settlement of surplus – Any excess generation left unadjusted across all time blocks in a billing month should be settled at the latest SECI discovered tariff



	period shall be accounted as if the excess exported electricity occurred during the off-peak time block: Provided further that the imported units under clause 8.1.3 (b), shall satisfy the minimum charges based on consumption, of the Retail Supply Tariff order for the respective category of consumer, else charges determined for minimum charges based on consumption, in Retail Supply Tariff order shall be applicable.	(Rs./kWh), and the corresponding monetary value should be credited/adjusted in the consumer's final monthly bill. Illustration: Suppose in a day, 32 time blocks have solar generation. If each block has 100 kWh of excess generation, the total monthly excess = 96000 kWh. If the latest SECI rate = ₹2/kWh, then the consumer should be credited ₹192000, adjusted in the monthly bill.
8.2.3 (c)	If the quantum of electricity units exported exceeds the consumption of the parent consumer during the Billing Period, the excess quantum of electricity units exported to grid shall be considered for adjustment against consumption of participating connections of same parent consumer in the same billing period: Provided that the electricity consumption of the participating connections shall first be adjusted with the electricity exported by the Rooftop solar PV system in the same billing period of the participating connections in the priority and ratio provided in the GNM Agreement. Any surplus generation/ export over consumption in a billing period shall be accounted in the same billing period as if the surplus generation /energy export has occurred during the off-peak time block for HT connections and any time block for LT connections. Provided further that in case the quantum of electricity units exported and allocated to the participating connection(s) exceeds the quantum imported by the participating connection(s) during the same Billing Period the excess quantum of electricity units shall be settled at the rate equal to the lowest tariff rate discovered in the solar bidding or as per the agreements viz., PPAs/PSAs/PUAs entered by TGDIs, as the case may be, in the preceding Financial Year. In case no rate is discovered in the preceding financial year, the lowest tariff rate discovered or as per the agreements viz., PPAs/PSAs/PUAs entered by TGDIs in the latest previous Financial Year shall be considered. The amount so arrived shall be either adjusted in the next month electricity bill or deposited in the bank account of the eligible consumer/prosumer furnished to the licensee at the time of filing of the application.; Provided also that the net imported units/consumption of parent and participating connections shall satisfy the Minimum Charges based on Consumption, of the Retail Supply Tariff order for the respective category of consumer, else charges determined for minimum energy charges	Clarification Required/Suggestion: Any surplus generation after block-wise/connection-wise adjustment should be aggregated monthly and settled at the discovered tariff (not to be considered as excess generation during "off-peak" hours), We respectfully submit the following modification for consideration: • Time block wise adjustment – Consumption in each time block should netted off with Time block wise generation after accounting the wheeling loss • Monthly settlement of surplus – Any excess generation left unadjusted across all time blocks in a billing month should be settled at the latest SECI discovered tariff (Rs./kWh), and the corresponding monetary value should be credited/adjusted in the consumer's final monthly bill



	criteria or Minimum Charges based on Consumption, as the case may be, in Retail Supply Tariff order shall be applicable	
8.4.4	The energy exported by the Rooftop solar PV system under VNM arrangement shall be offset against the energy consumption of the participating consumers from the Distribution Licensee in the following manner: a) The electricity consumption of each participating consumer shall be first adjusted with the electricity exported by the Rooftop solar PV system in the same billing period of the participating consumer in the priority and ratio provided in the VNM Agreement. Any surplus generation/ export over consumption in a billing period shall be accounted in the same billing period as if the surplus generation/energy export has occurred during the off-peak time block for HT consumers and any time block for LT consumers. b) If the quantum of electricity units exported and allocated to the participating consumer exceeds the quantum imported by the participating consumer during the same Billing Period, such excess quantum of electricity units shall be settled at the rate equal to the lowest tariff rate discovered in the solar bidding or as per the agreements viz., PPAs/PSAs/PUAs entered by TGDIs, as the case may be, in the preceding Financial Year. In case no rate is discovered in the preceding financial year, the lowest tariff rate discovered or as per the agreements viz., PPAs/PSAs/PUAs entered by TGDIs in the latest previous Financial Year shall be considered. The amount so arrived shall be either adjusted in the next month electricity bill or deposited in the bank account of the eligible consumer/prosumer furnished to the licensee at the time of filing of the application.; Provided further that the imported units under Clauses 8.4.2, 8.4.3 and 8.4.4 shall satisfy the Minimum Charges based on Consumption, of the Retail Supply Tariff order for the respective category of consumer, else charges determined for minimum energy charges criteria or Minimum Charges based on consumption, as the case may be, in Retail Supply Tariff order shall be applicable. c) If the quantum of electricity units imported by the participating consumer during any Billing Period exceeds the quantum of electricity units wheeled from Solar Generator, the Distribution Licensee shall raise its invoice for the electricity	Suggestion: Any surplus generation after time block-wise/connection-wise adjustment should be aggregated monthly and settled at the discovered tariff (not to be considered as excess generation during "off-peak" hours), and adjusted in the monthly bill of participating consumers



	consumption after adjusting the credited units to participating consumer; d) The parent consumer shall have the option to change the share of credit of electricity from Rooftop solar PV system among its participating consumers and also addition or deletion of participating consumers under intimation to existing and added participating consumers indicated under the group net metering agreement once in the financial year with advance notice of 1 month.	
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For and behalf of Manikaran Power Limited,



Authorized Signatory

