Venkat N.K.K,
Independent Member- CGRF (Rural)- **(TGSPDCL)**
General Secretary - Telangana State Solar Open Access DEVELOPERS' Association **(TSOADA)**
Member- Energy Committee- Federation of Chamber of Commerce of Telangana **(FTCCI)**

To,
Dated:05-09-2025

The Secretary,
Telangana Electricity Regulatory Commission (TGERC),
Vidyut Niyantran Bhavan, Sy.No.145-P, G.T.S. Colony, Kalyan Nagar, Hyderabad 500 045.
Email id: secy@tserc.gov.in

Dear Sir,

Sub:- Objections/Suggestions on the "Telangana Electricity Regulatory Commission (Rooftop Solar PV Grid Interactive Systems) Regulation, 2025- Reg.

****

Clause 2.1(n):

It is submitted that the definition of Group Net Metering arrangement may be suitably broadened to include participating service connections that holds at least 26% equity in parent consumer, in consonance with the provisions of the Electricity Rules, 2005 (Captive Rules). Restricting eligibility only to service connections directly belonging to the parent consumer would unduly limit the scope and utility of Group Net Metering.

Clauses 4.13 and 4.14:

There exists an apparent contradiction between these two provisions. While Clause 4.13 stipulates that third-party sales shall not be permitted under any of the four modes, Clause 4.14 allows ownership of rooftop systems by third parties. Such inconsistency may lead to interpretational ambiguity and implementation challenges. It is therefore humbly prayed that the Hon'ble Commission may kindly clarify the intent and applicability of these provisions.

Clauses 4.15 and 4.16:

It is most respectfully submitted that wheeling charges for Group Net Metering and Virtual Net Metering be prescribed in the denomination of Rs/kVA/hr, in alignment with the methodology followed for short-term open access transactions. The existing practice under long-term and medium-term arrangements—levying fixed charges (Rs/kVA/month) based on installed capacity—bears no correlation to the actual quantum of energy exported and, as such, does not reflect the true cost of wheeling.

Further, the present draft does not provide for carry-forward of unutilized energy to the subsequent month. In the absence of such a provision, it is respectfully urged that the Hon'ble Commission may adopt the Rs/kVA/hr denomination, as applied to short-term transactions, to ensure cost-reflective, equitable, and non-discriminatory treatment of distributed generation.

Thanks & Regards,

Venkat N.K.K,
B.E (Anna University), M.B.A (SPJAIN), L.L.B (Osmania University))

Email Id: venkat.snpm@gmail.com

Mob: +91-9666 22 99 75.