NORTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED
CORPORATE OFFICE: VIDYUTH BHAVAN: WARANGAL

The Hon'ble TGERC has invited comments/suggestions/objections from the stakeholders on the provisions of above draft Regulation 2025 on Rooftop Solar PV Grid Interactive Systems. In this regard, the TGNPDCL's comments on above revised draft Gazette Notification are hereunder submitted:

Clause	Draft Regulation proposed by Hon'ble TGERC	TGNPDCL's Comments	Justification
2.1 (n)	"Group Net Metering" or "GNM" means an arrangement whereby surplus electricity generated/injected from a Rooftop Solar PV System installed in the premises of prosumer/parent consumer is exported to the grid through Net Meter and the exported electricity is adjusted in more than one service connections of same category as that of parent consumer and located within the same distribution licensee's area of supply;	"Group Net Metering" or "GNM" means an arrangement whereby surplus electricity generated/injected from a Rooftop Solar PV System installed in the premises of prosumer/parent consumer is exported to the grid through Net Meter and the exported electricity is adjusted in more than one service connections **of that of parent consumer of same category** and located within the same distribution licensee's area of supply;	Phrasing of sentence modification is proposed for more clarity on the other service connections of parent consumer.

2.1 (w)	"Participating consumer" or "beneficiary" means pre-identified consumer, who has given an undertaking as per clause 6.2 of these regulations and who avails exported energy of a Grid Interactive Rooftop Solar PV system under a Virtual Net Metering arrangement;	"Participating consumer" or "beneficiary" means pre-identified consumer, who has given an undertaking as per **Annexure-8** of these regulations and who avails exported energy of a Grid Interactive Rooftop Solar PV system under a Virtual Net Metering arrangement;	As per the proposed regulation by the Hon'ble Commission, Undertaking is placed at Annexure-8 for participating consumer under VNM. Accordingly the said clause is proposed for modification.
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.	The eligible consumers of all categories may install the Rooftop Solar PV System under the Net Metering Arrangement up to **10 (Ten) kW capacity.** Provided that existing prosumers who are already availing the facility of Net Metering and have installed capacity above **10 (Ten)** kW shall continue to get the benefit of net metering facility under these Regulations.	In view of proposed Net billing arrangement by the Discom, it is requested limit maximum allowable capacity to install the Rooftop Solar PV System under the Net Metering Arrangement up to 10KW.
4.9	**New clause to be added**	The following may be added under clause 4.9 (i), (ii),(iii) Net metering shall not be allowed for temporary supply category.	In General temporary supply is for limited period i.e., upto project completion and after project completion regular supply will be extended under applicable category. The feasibility of RTS capacity is decided on the category of the consumer.
4.12	The eligible parent consumers/ prosumers under Group Net Metering	The eligible parent consumers/ prosumers and **participating**	Since the monthly bills of the participating consumers/participating connections are

	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. Provided that wheeling of energy shall be allowed from parent consumer/prosumer to the participating consumers in the manner and on payment of charges as specified in Clauses 4.16 and 4.17 of this regulation.	**connections/ participating consumers** 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. Provided that wheeling of energy shall be allowed from parent consumer/prosumer to the participating consumers/ **participating connections** in the manner and on payment of charges as specified in Clauses **4.15,** 4.16 and 4.17 of this regulation.	being adjusted with the units generated under Group Net Metering/Virtual Net Metering, the said connections/consumers shall not be allowed to avail the facility of open Access along with the parent consumers/prosumers. Further, wheeling charges & losses are also applicable to participating connections for wheeling of energy under Group Net metering.
4.14	In case a Rooftop Solar PV System whether self-owned or leased by a Third Party Owner, is installed on prosumer premises under Net Metering arrangement or Gross Metering Arrangement, as the case may be, prosumer shall be exempted from banking charges, wheeling charges, cross subsidy surcharge and additional surcharge.	In case a Rooftop Solar PV System whether self-owned or leased by a Third Party Owner, is installed on prosumer premises under Net Metering arrangement or Gross Metering Arrangement, as the case may be, prosumer shall be exempted from ~~**banking charges,**~~ wheeling charges, cross subsidy surcharge and additional surcharge. **However, Banking charges shall be applicable to the prosumers under Net Metering arrangement.**	It is proposed to impose banking charges under Net Metering arrangement as the energy generated by the prosumer at particular time period can be utilized at different time period which may be treated Banking of energy. The solar rooftop system owner export surplus power to the grid during sunlight period during day time and utilize grid power during non-solar hours. The grid essentially acts as a “virtual battery” and discom will incurred some additional cost

			for balancing and reliable power to accommodate to the above fluctuations. The Loss of revenue from the solar consumers who use the grid power less during sunny hours and more power in the non solar hours may cause increased cost to non solar consumers. Proposed Banking charges for solar rooftop net meter consumers are to compensate Distribution licensee cost, operational challenges associated with managing intermittent renewable energy inflows to the grid to address revenue loss and grid stability. Hence the proposal is justified.
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	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 cross subsidy surcharge and additional surcharge. Wheeling charges shall be applicable only on participating connections(s) as	It is proposed to impose banking charges under Net Metering arrangement as the energy generated by the prosumer at particular time period can be utilized at different time period which may be treated Banking of energy. The solar rooftop system owner export surplus power to the grid during sunlight period during day time and utilize grid power during non-solar hours. The grid essentially acts as a “virtual battery” and

	per the voltage level of the 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.	per the voltage level of the participating connection(s). **Banking charges** shall be applicable only on prosumer/parent consumer. 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 **connections**.	discom will incurred some additional cost for balancing and reliable power to accommodate to the above fluctuations. The Loss of revenue from the solar consumers who use the grid power less during sunny hours and more power in the non solar hours may cause increased cost to non solar consumers. Proposed Banking charges for solar rooftop net meter consumers are to compensate Distribution licensee cost, operational challenges associated with managing intermittent renewable energy inflows to the grid to address revenue loss and grid stability. Hence the proposal is justified. To maintain uniformity of nomenclature, it is proposed to replace word “participating consumers” with “participating **connections”**.
4.17	In case of Group Net Metering and Virtual Net Metering connections, voltage	In case of Group Net Metering and	The wheeling charges & losses are

	wise losses as determined under Wheeling Tariff Order of Commission in force shall be applicable on wheeled energy prior to crediting it into account of participating consumers. Wheeling charges, cross subsidy surcharge, additional surcharge (if applicable), as the case may be, shall be applicable on the participating consumers/connections as determined by the Commission from time to time.	Virtual Net Metering connections, voltage wise losses as determined under Wheeling Tariff Order of Commission in force shall be applicable on wheeled energy prior to crediting it into account of participating **connections**/ consumers. Wheeling charges, cross subsidy surcharge, additional surcharge (if applicable), as the case may be, shall be applicable on the participating consumers/connections as determined by the Commission from time to time.	applicable to participating connections/consumers for wheeling of energy under Group Net metering and Virtual Net Metering.
4.19	An eligible consumer/prosumer intending to install a Rooftop Solar PV System having the capacity in excess of 75 kW shall insure the Rooftop Solar PV system and obtain the certificate from the Chief Electrical Inspector to the Government (CEIG), who shall test and certify the safety and protection within Fifteen (15) working days from the date of receipt of the information. Provided that the Solar PV System having capacity up to 75 KW shall be inspected, tested and self-certified by the eligible consumer with regard to the safety and	An eligible consumer/prosumer intending to install a Rooftop Solar PV System having the capacity in excess of **56 kW** shall insure the Rooftop Solar PV system and obtain the certificate from the Chief Electrical Inspector to the Government (CEIG), who shall test and certify the safety and protection within Fifteen (15) working days from the date of receipt of the information. Provided that the Solar PV System having capacity up to **56 KW** shall be inspected, tested and self-certified by the eligible consumer	As per GTCS clause.No.3.5.4, wherever the total connected load of all such multiple connections exceeds 75 HP, the consumers must necessarily switch over to HT supply. Further, as per Tariff Order issued by the Hon'ble Commission also, consumers with contracted load up to 56KW/75HP are billed under LT and contracted load exceeds 56KW/75HP are billed under HT respectively. The connected load 75HP is equivalent to 56 KW. Hence in line with the GTCS, certificate from the Chief Electrical Inspector may be

	protection.	with regard to the safety and protection.	made mandatory for Solar Rooftop power plant of capacity in excess of 56 KW instead of 75KW.
4.20	An eligible consumer intending to install a Roof Top Solar PV system having capacity in excess of 75 kW can connect to 11 kV or 33 kV feeder of a Distribution Licensee from which the feeder of an eligible consumer is availing of supply of power.	An eligible consumer intending to install a Roof Top Solar PV system having capacity in excess of **56 KW** can connect to 11 kV or 33 kV feeder of a Distribution Licensee from which the feeder of an eligible consumer is availing of supply of power.	As per GTCS clause.No.3.5.4, wherever the total connected load of all such multiple connections exceeds 75 HP, the consumers must necessarily switch over to HT supply. Further, as per Tariff Order issued by the Hon'ble Commission also, consumers with contracted load up to 56KW/75HP are billed under LT and contracted load exceeds 56KW/75HP are billed under HT respectively. The connected load 75HP is equivalent to 56 KW.
4.21	**New clause to be added**	An eligible Consumer/Prosumer intending to install a Rooftop Solar PV System having the capacity 500 kW (0.5 MW) or above are required to obtain the unique registration number on e-portal https://egen.cea.gov.in and shall register with SLDC in compliance with CEA Regulations & Hon'ble TGERC Regulation.	All solar generators (including rooftop) of 0.5MW and above shall register in the CEA Registry before connectivity with the Grid as per CEA (Technical Standards for connectivity to the Grid) Regulations 2007 and amendments thereof and all Solar Generators shall register with SLDC as per TGERC Regulation No 1 of 2006.

<table>
<tr>
<td>6.1</td>
<td>The prosumer shall submit the application to connect its Rooftop Solar PV System to the distribution system of the Licensee for approval of net metering, gross metering, group net metering or virtual net metering connections in the specified form as per Annexure-2 to Annexure-5 appended with the Regulation along with processing fee as specified below at the concerned office of the Distribution Licensee.
<table>
<tr><th>System size</th><th>Applicable fee per connection</th></tr>
<tr><td>For all LT consumers</td><td>Rs.2,500</td></tr>
<tr><td>For all HT consumers</td><td>Rs.15,000</td></tr>
</table>
</td>
<td>The prosumer shall submit the application to connect its Rooftop Solar PV System to the distribution system of the Licensee for approval of net metering, gross metering, group net metering or virtual net metering connections in the specified form as per Annexure-2 to Annexure-5 appended with the Regulation along with processing fee as specified below at the concerned office of the Distribution Licensee.
<table>
<tr><th>System size</th><th>Applicable fee per connection</th></tr>
<tr><td>For all LT consumers less than 10 KW</td><td>Rs.2,500</td></tr>
<tr><td>For all LT consumers 10 KW and above</td><td>Rs.10,000</td></tr>
<tr><td>For all HT consumers</td><td>Rs. 20,000</td></tr>
</table>
</td>
<td>The existing Net meter application charges were communicated in Regulation 06 of 2016.

The processing fee in respect of LT services 10 KW and above & HT Services is proposed for modification duly considering inflation rates over the years.

However, the processing fee is not altered for LT Consumers below 10 KW so as to encourage registrations under PM Surya Ghar Scheme.

As per clause. No. 4.5.2 of Retailed Supply Tariff order FY.2025-26, Trivector meters shall be provided for all 10 kW and above load services.</td>
</tr>
<tr>
<td>6.2</td>
<td>In case of group net metering or virtual net metering arrangement an undertaking as per Annexure-6 or Annexun-8 respectively shall also has to be 8 furnished for all the participating consumers/connections of group net metering and virtual net metering.</td>
<td>In case of group net metering or virtual net metering arrangement an undertaking as per Annexure-6 or Annexun-8 respectively shall also has to be 8 furnished for all the participating connections/consumers of group net metering and virtual net</td>
<td>To maintain uniformity of nomenclature.</td>
</tr>
</table>

		metering.	
6.6 Para (1)	The Distribution Licensee shall assess the feasibility of interconnection point and the relevant distribution transformer capacity and/ or relevant 11 kV / 33 kV feeder capacity (in case of HT consumer) and communicate the same to the Eligible Consumer within Fifteen (15) working days from the receipt of proper application. The feasibility so communicated shall be valid for a period of four (4) months, unless extended by the Distribution Licensee for a reasonable cause. Any application not acted up by the Distribution Licensee as per sub para 6.4 of this regulation within Fifteen (15) working days from the date of receipt shall be deemed to have been approved.	The Distribution Licensee shall assess the feasibility of interconnection point and the relevant distribution transformer capacity and/ or relevant 11 kV / 33 kV feeder capacity (in case of HT consumer) and communicate the same to the Eligible Consumer within Fifteen (15) working days from the receipt of proper application. The feasibility so communicated shall be valid for a period of **four (4) months** and will not be further extended by the Distribution Licensee.	It is submitted that by reducing the feasibility validity period from 10 months to 4 months, the vendors will install the solar plants within 4 months instead of 10months, thereby ensuring greater consumer satisfaction and faster capacity addition of RE to grid.
6.6 Para (5)	Provided that the feasibility communicated by the Distribution Licensee shall not exceed a period of Ten (10) months including the extended time from the date of first feasibility communication.	**This para may be deleted**	Since it is proposed for reduction of validity period of the feasibility from 10 months to 4 months without any further extension by the Distribution Licensee.
7.1	The Distribution Licensee shall ensure that the inter-connection of the Rooftop Solar PV System with its Network conforms to the specifications, standards and other provisions specified by the Central Electricity Authority (CEA) in (Technical Standard for Connectivity of	The Distribution Licensee shall ensure that the inter-connection of the Rooftop Solar PV System with its Network conforms to the specifications, standards and other provisions specified by the Central Electricity Authority (CEA) in	AC capacity is limited to proposed solar contracted capacity with the Distribution Licensee while allowing 5% variation on DC side solar panels.

	the Distributed Generation Resources) Regulations, 2013, the CEA (Measures relating to Safety and Electric Supply), Regulations, 2010, the State Grid Code and their amendments thereof. Provided that a variation in the rated capacity of the system within a range of five percent (5%) shall be allowed:	(Technical Standard for Connectivity of the Distributed Generation Resources) Regulations, 2013, the CEA (Measures relating to Safety and Electric Supply), Regulations, 2010, the State Grid Code and their amendments thereof. Provided that a variation in the rated capacity of the system within a range of five percent (5%) shall be allowed only on PV Solar Panels Capacity. Further the **inverter capacity shall be limited to the approved capacity.**	
8.1.2	a. Quantum of electricity injected by Rooftop solar PV system in the grid in the billing period, showing opening and closing balance; b. Quantum of electricity supplied by the Distribution Licensee in the billing period, showing opening and closing balance; c. Quantum of Net billed electricity;	a. Quantum of electricity injected by Rooftop solar PV system in the grid in the billing period, showing **initial and final reading**; **b.** Quantum of electricity supplied by the Distribution Licensee in the billing period, showing **initial and final reading;** c. Quantum of Net billed electricity/ **net excess units to be settled**;	It is respectfully submitted that, as per the proposed regulation, there shall be no carried forward of solar energy units to the subsequent billing period, since the excess of quantum of units exported by the consumer is to be settled within the same billing period. In view of above, the information related to opening and closing balances of export & import energy of the consumer need not be reflect in the consumer's bill. It is further submitted that the quantum of net excess units, wherever the exported units exceed the import units during a given month, shall be duly shown in the bill for settlement.

		d. Banking charges in kind 8% on exported units.	**Since Banking charges are proposed to levied on the prosumers under Net Metering arrangement at Cl. 4.14, this item is included.**
8.1.2(e)	Units used by the Distribution Licensee for RPO compliance.	**Energy by a multiplier of 4 kilowatt hour per kilowatt per day (kWh/kW/day) for capacity of solar rooftop PV system shall be considered for RPO compliance of Distribution Licensee.**	As per Note 4 of Revised Draft Gazette Notification dated: 05.08.2025 on Renewable Consumption Obligation (RCO) under the Energy Conservation Act, 2001 permits to consider to convert reported capacity to renewable energy generation by considering a multiplier which is reproduced below: "Provided further that in case the designated consumer is unable to provide generation data against Distributed renewable energy installations, the reported capacity shall be converted into Distributed renewable energy generation in terms of energy by a multiplier of 4 kilowatt hour per kilowatt per day (kWh/kW/day)."
8.1.3(a)	If the quantum of electricity units exported exceeds the quantum imported during the 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	If the quantum of electricity units exported exceeds the quantum imported during the Billing Period, the excess quantum of electricity units shall be settled at the rate equal to the lowest tariff rate discovered in the	

	or as per the agreements viz., PPAs/PSAs/PUAs entered by TGDiscoms, 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 TGDiscoms 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 that the settlement rate as mentioned above shall be notified by the Commission from time to time every year.	solar bidding or as per the agreements viz., PPAs/PSAs/PUAs entered by TGDiscoms, 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 TGDiscoms 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 that the settlement rate as mentioned above shall be notified by the Commission from time to time every year. **Provided that if the quantum of electricity exported exceeds the quantum imported during the Billing Period, the eligible consumer shall get a monthly minimum bill.**	The minimum energy charges as per Retail supply Tariff Order for respective categories is aimed to recovery of certain portion of fixed charges of the Distribution licensees under tariff design.
8.1.3(b)	If the quantum of electricity units imported by the prosumer during any Billing Period exceeds the quantum of	If the quantum of electricity units imported by the prosumer during any Billing Period exceeds the quantum of	As per RST, the consumer Sub-Category/ Slab Structure (units) is decided based on total import consumption for billing but not

	electricity units exported, the Distribution Licensee shall raise its invoice for the electricity consumption after adjusting the credited units:	electricity units exported, the Distribution Licensee shall raise its invoice **for the net consumption with the applicable slab rate of total import consumption.**	net consumption after adjustment of exported units. The main purpose of availing RTS facility under Net metering is for self consumption. Hence surplus units consumed after netting off export shall only be considered/billed as per applicable slab rate of total consumption to avoid subsidized power to high consumption services. **Example**: In a billing month if the import consumption of the prosumer is 300 units and export consumption is 220units, the net consumption of 80 units shall be billed with Rs.7.70 per unit (LT-I(C): More than 200 units/month) instead of Rs.3.40 per unit (LT-I(B): More than 100 & up to 200 units/month).
	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	Provided that in case, where the prosumer is under **the ambit of Time of Day (ToD) Tariff**, 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	As per the present Retail Supply Tariff Order, the ToD Tariff is applicable to certain categories of HT categories only. It is further envisaged that the ToD Tariff may be extended to other categories of consumers including LT categories in the future.

	a billing period shall be accounted as if the excess exported electricity occurred during the off-peak time block:	consumption in any other time block in a billing period shall be accounted as if the excess exported electricity occurred during the off-peak time block:	
8.1.5	The Distribution Licensee in addition to consumer tariff shall be eligible to raise invoice for any other charges as allowed by the Commission and any tax/duty/cess imposed by the Government on the net billed units.	The Distribution Licensee in addition to consumer tariff shall be eligible to raise invoice for any other charges as allowed by the Commission and any tax/duty/cess imposed by the Government on the **Total import units by the prosumer.**	As per the Electricity Duty Act, Electricity Duty shall be lived on every unit of electrical energy consumed by the consumer. If the Electricity Duty is levied on net billed units instead of gross energy units, a portion of electrical energy actually consumed by the consumer will escape levy of electricity duty. Consequently, the State Government will incur loss of revenue. Thus, electricity duty on total energy consumed rather than net energy is very much justifiable.
8.2.1	The Distribution Licensee shall undertake meter reading of the Solar Generation Meter/Net Meter of parent consumer and the Consumer Meters for all participating connections, according to the regular billing period.	The Distribution Licensee shall undertake meter reading of the ~~**Solar Generation Meter/**~~Net Meter of parent consumer and the Consumer Meters for all participating connections, according to the regular billing period.	Since the regulation proposes net metering arrangement for parent consumer under Group Net Metering, the word "Solar Generation Meter" is deleted.
8.2.2	8.2.2. For each Billing Period, the Distribution Licensee shall make the following information available on its bills to the parent consumer and its	For each Billing Period, the Distribution Licensee shall make the following information available on its bills to the parent consumer and its	It is respectfully submitted that, as per the proposed regulation, there shall be no carried forward of solar energy units to the subsequent billing period, since the excess

	connections: a) Quantum of electricity injected by Rooftop solar PV system in the grid in the billing period, showing opening and closing balance in the parent consumer's bill; b) Quantum of energy deducted on account of losses from wheeled energy; c) Quantum of electricity adjusted out of total energy injected by the Rooftop solar PV system in the grid in the billing period as per priority and ratio declared by consumer in each participating connection's bill; d) Quantum of electricity supplied by the Distribution Licensee in the billing period, showing opening and closing balance for all the connections; e) Quantum of net billed electricity; and f) Units used by the Distribution Licensee for RPO compliance only in parent consumer's bill.	connections: a) Quantum of electricity injected by Rooftop solar PV system in the grid in the billing period, showing **initial and final reading** in the parent consumer's bill; b) **Quantum of electricity supplied by the Distribution Licensee in the billing period for the parent consumer, showing initial and final reading;** c) Quantum of energy deducted on account of losses from wheeled energy; d) Quantum of electricity adjusted out of total energy injected by the Rooftop solar PV system in the grid in the billing period as per priority and ratio declared by consumer in each participating connection's bill; e) Quantum of electricity supplied by the Distribution Licensee in the billing period, **showing initial and final reading** for all the connections; f) Quantum of net billed electricity/ **net excess units to be settled**; and g) Units used by the Distribution Licensee for RPO compliance only in	of quantum of units exported by the consumer is to be settled within the same billing period. In view of above, the information related to opening and closing balances of export & import energy of the consumer need not be reflect in the consumer's bill. It is further submitted that the quantum of net excess units, wherever the exported units exceed the import units during a given month, shall be duly shown in the bill for settlement.

		parent consumer's bill.	
8.2.3(a)	a) 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 to prosumer:	a) If the quantum of electricity units imported by the prosumer/**parent consumer** during any Billing Period exceeds the quantum of electricity units exported, the Distribution Licensee shall raise its invoice **for the net consumption with the applicable slab rate of total import consumption. In such case, no energy shall be adjusted to participating connections.**	As per RST, the consumer Sub-Category/ Slab Structure (units) is decided based on total import consumption for billing but not net consumption after adjustment of exported units. The primary objective of availing RTS facility under Net metering is for self consumption. Therefore, only the surplus units consumed after netting off export shall be considered and billed as per the applicable slab rate on the total consumption, so as to prevent subsidized power being extended to high consumption services. **Example**: In a billing month if the import consumption of the prosumer is 300 units and export consumption is 220units, the net consumption of 80 units shall be billed with Rs.7.70 per unit (LT-I(C): More than 200 units/month) instead of Rs.3.40 per unit (LT-I(B): More than 100 & up to 200 units/month).
8.2.3(b)	In case, where the parent consumer is under HT Category, the electricity consumption of the parent consumer in	In case, where the parent consumer is under **the ambit of Time of Day**	As per the present Retail Supply Tariff Order, the ToD Tariff is applicable to certain

	any time block (e.g., peak hours, off-peak hours, etc.) shall be first compensated with the electricity exported in the same time block in the same billing cycle of the consumer where the prosumer is located. Any cumulative excess export over and above the consumption in any other time block in a billing period shall be accounted as if the excess export occurred during the off-peak time block:	**(ToD) Tariff**, the electricity consumption of the parent consumer 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 in the same billing cycle of the consumer where the prosumer is located. Any cumulative excess export over and above the consumption in any other time block in a billing period shall be accounted as if the excess export occurred during the off-peak time block:	categories of HT categories only. It is further envisaged that the ToD Tariff may be extended to other categories of consumers including LT categories in the future.
8.2.3 (c) para (1)	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	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	As per the present Retail Supply Tariff Order, the ToD Tariff is applicable to certain categories of HT categories only. It is further envisaged that the ToD Tariff may be extended to other categories of consumers including LT categories in the future.

	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 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 **connections under the ambit of Time of Day (ToD) Tariff** and any time block for connections **under the Non-Time of Day (ToD) Tariff**.	
8.2.5	The Distribution Licensee shall prepare a net bill comprising of the amount payable by parent consumers/Participating connections as per Regulation 8.2 for each billing period: Provided that if the net bill amount for a billing period is payable by the parent consumer against own connection and other participating connections, then the same shall be paid by them within the due date of the bill.	The Distribution Licensee shall prepare a net bill comprising of the amount payable by parent consumers/Participating connections as per Regulation 8.2 for each billing period: Provided that if the net bill amount for a billing period is payable by the parent consumer against own connection and other participating connections, then the same shall be paid by **him** within the due date of the bill.	As per this proposed regulation, parent consumer and participating connections shall be situated in the same distribution licensee area i.e., they may be in different circles/divisions/ERO etc. across the DISCOM. As this clause proposes issue of consolidated bill to parent consumer under GNM, settlement of energy and net bill amount may be broadly affected if meter readings are taken at different dates during a billing period. In view of the above, Smart meters are proposed to all participating connections for remote data logging at the same time to enable to issue a consolidated bill at once. Hence this may be incorporated.

8.3.2	For each Billing Period, the Distribution Licensee shall make the following information available on its bill to the prosumer: a. Quantum of electricity generation recorded by the solar generation meter of the Rooftop solar PV system in the billing period, showing opening and closing balance; b. Quantum of electricity units consumed by the prosumer from licensee's system in the billing period, showing opening and closing balance; c. Credited amount towards payment of energy supplied to the distribution licensee, if any, in the billing period showing opening and closing balance; and d. Units from Solar generation used by the Distribution Licensee for RPO compliance.	For each Billing Period, the Distribution Licensee shall make the following information available on its bill to the prosumer: a. Quantum of electricity generation recorded by the solar generation meter of the Rooftop solar PV system in the billing period, showing **Initial and Final readings**; b. Quantum of electricity units consumed by the prosumer from licensee's system in the billing period, showing **Initial and Final readings**; c. Credited amount towards payment of energy supplied to the distribution licensee, if any, in the billing period ~~**showing opening and closing balance;**~~ and d. Units from Solar generation used by the Distribution Licensee for RPO compliance.	It is respectfully submitted that, as per the proposed regulation, there shall be no carried forward of solar energy units to the subsequent billing period, since the excess of quantum of units exported by the consumer is to be settled within the same billing period. In view of above, the information related to opening and closing balances of export & import energy of the consumer need not be reflect in the consumer's bill.
8.4.2	For each Billing Period, the Distribution Licensee shall make the following information available on its bill to the prosumer/parent consumer: a. Quantum of electricity generation recorded by the solar generation meter of	For each Billing Period, the Distribution Licensee shall make the following information available on its bill to the prosumer/parent consumer: a. Quantum of electricity generation recorded by the solar generation meter	It is respectfully submitted that, as per the proposed regulation, there shall be no carried forward of solar energy units to the subsequent billing period, since the excess of quantum of units exported by the consumer is to be settled within the same

	the Rooftop solar PV system in the billing period, showing opening and closing balance in the parent consumer bill; b. Quantum of electricity units consumed by the prosumer/consumer from licensee's system in the billing period, showing opening and closing balance; c. Amount of billing credit, if any, in the billing period, showing opening and closing balance; and .	of the Rooftop solar PV system in the billing period, **showing initial and final reading** in the parent consumer bill; b. Quantum of electricity units consumed by the prosumer/consumer from licensee's system in the billing period, **showing initial and final reading**; c. **This clause may be deleted.**	billing period. In view of above, the information related to opening and closing balances of export & import energy of the consumer need not be reflect in the consumer's bill. Since under VNM, the exported units from the rooftop PV system shall be adjusted to the participating connections only, and there is no provision to adjust to parent consumer. In such case, there is no question of arising amount of bill credit to the parent consumer under VNM.
8.4.3	For each Billing Period, the Distribution Licensee shall make the following information available on its bills to the participating consumers: a) Quantum of electricity generated by Rooftop solar PV system in the grid in the billing period, showing opening and closing balance in the parent consumer bill; b) Quantum of energy deducted on account of losses from wheeled energy; c) Quantum of net electricity allocated out of total energy injected by the Rooftop solar PV system in the grid in	For each Billing Period, the Distribution Licensee shall make the following information available on its bills to the participating consumers: **a) Quantum of gross electricity allocated out of the total energy injected by the Rooftop solar PV system in the grid in the billing period as per the priority and ratio declared by the parent consumer;** b) Quantum of energy deducted on account of losses from wheeled energy; **c) Quantum of net electricity allocated units duly deducting**	Since under VNM, the allocated units from the rooftop PV system shall be adjusted to the participating consumers' connections and bills will be issued to participating consumers only. Hence the quantum of electricity allocated to each participating consumer shall have to be displayed in the bill.

	the billing period as per priority and ratio declared by parent consumer in each participating consumer showing opening and closing balance; d) Quantum of electricity supplied by the Distribution Licensee in the billing period, showing opening and closing balance for each of the participating consumers; and e) Quantum of Net billed electricity:	**wheeling losses from the gross electricity allocated in the billing period;** d) Quantum of electricity supplied by the Distribution Licensee in the billing period, **showing initial and final reading** for each of the participating consumers; and e) Quantum of Net billed electricity// **net excess units to be settled**;	
8.4.4 (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.	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 consumers **under the ambit of Time of Day (ToD) Tariff** and any time block for consumers **under the Non-Time of Day (ToD) Tariff**.	As per the present Retail Supply Tariff Order, the ToD Tariff is applicable to certain categories of HT categories only. It is further envisaged that the ToD Tariff may be extended to other categories of consumers including LT categories in the future.

8.4.6 Para (1)	The Distribution Licensee shall prepare a net bill comprising of the amount payable by Distribution Licensee and amount payable by prosumer and participating consumers as per Clauses 8.4.2, 8.4.3 and 8.4.4 above for each billing period:	--	As per this proposed regulation, parent consumer and participating consumers shall be situated in the same distribution licensee area i.e., they may be in different circles/divisions/ERO etc. across the DISCOM. As this clause proposes issue of consolidated bill to parent consumer under VNM, settlement of energy and net bill amount may be broadly affected if meter readings are taken at different dates during a billing period. In view of the above, Smart meters are proposed to all participating consumers for remote data logging at the same time to enable to issue a consolidated bill at once. Hence this may be incorporated.
9.1	The quantum of electricity consumed by an Eligible Consumer from the Rooftop Solar PV System under Net Metering, Group Net Metering arrangement, Gross Metering and Virtual Net Metering Arrangement shall qualify towards compliance of Renewable Purchase Obligation (RPO) for the Distribution Licensee/Obligated Entity: Provided that in cases Solar Generation	Following clause may be added to Clause 9.1 **"Provided further that in case of non availability of generation meter, generation data against Distributed renewable energy installations under Net Metering and Group Net Metering arragnements, the reported capacity shall be converted**	As per Note 4 of Revised Draft Gazette Notification dated: 05.08.2025 on Renewable Consumption Obligation (RCO) under the Energy Conservation Act, 2001 permits to consider to convert reported capacity to renewable energy generation by considering a multiplier which is reproduced below: Provided further that in case the designated

	meter is installed as per provisions of CEA (Installation and Operation of Meters) Regulations,2006 as amended from time to time, and such meter is read by Distribution Licensee, the quantum of energy generated as a whole shall qualify towards compliance of RPO of Distribution Licensee/Obligated Entity.	**into Distributed renewable energy generation in terms of energy by a multiplier of 4 kilowatt hour per kilowatt per day (kWh/kW/day)."**	consumer is unable to provide generation data against Distributed renewable energy installations, the reported capacity shall be converted into Distributed renewable energy generation in terms of energy by a multiplier of 4 kilowatt hour per kilowatt per day (kWh/kW/day).
10.3	In case of switching over of existing retail consumers to Net Metering and Group Net Metering Arrangement, the existing meter in the premises of the prosumer shall be replaced by the bi-directional smart meter as per CEA (Installation and Operation of Meters) Regulations at the cost of the prosumer. Provided that in case of Gross Metering and Virtual Net Metering Arrangement, **the existing consumer meter in the premises of the parent/participating consumers shall be continued** for accounting and settlement of the units wheeled/ imported from the grid.	In case of switching over of existing retail consumers to Net Metering and Group Net Metering Arrangement, the existing meter in the premises of the prosumer shall be replaced by the bi-directional smart meter as per CEA (Installation and Operation of Meters) Regulations at the cost of the prosumer. Provided that in case of Gross Metering and Virtual Net Metering Arrangement, **the existing consumer meter in the premises of the parent/participating consumers shall be replaced with**	As per this proposed regulation, parent consumer/participating consumers/ connections shall be situated in the same distribution licensee area i.e., they may be in different circles/divisions/ERO etc. across the DISCOM. As this clause proposes issue of consolidated bill to parent consumer under VNM/GNM, settlement of energy and net bill amount may be broadly affected if meter readings are taken at different dates during a billing period. In view of the above, Smart meters are proposed to all participating consumers/ connections for remote data logging at the same time to enable to issue a consolidated bill at once. Hence this may be incorporated.

		Smart Meter at their cost for accounting and settlement of the units wheeled/ imported from the grid. **Provided that data communication charges in respect of bi-directional smart meter /smart meter under solar rooftop system is to be borne by the prosumer/parent consumer/ participating consumers/ connections, the same shall be recovered through monthly bills.**	For data communication, SIM card etc. are to be provided in the meter and the same is arranged by DISCOM. Since the payment to Telecom Providers is to be done on monthly basis, the same cost is to be recovered through respective solar rooftop consumers to avoid burden on the other non-solar consumers as the said cost of the smart net meter is being borne by the respective solar rooftop consumer.
Annexure-7 Illustration Group Net Metering	--	--	As per Cl. 8.2.3 (C) of this regulation, 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 priority and ratio provided in the GNM Agreement. In the illustration, the entire generation from the solar rooftop was allocated among the participating connections including parent consumer which is contrary to the above said clause. This may be clarified.

It is proposed to introduce "**Net Billing Arrangement"** in addition to the Net Metering, Group Net Metering, Gross Metering and Virtual Net Metering arrangement proposed by Hon'ble Commission in the draft regulation. The salient points on the proposed Net Billing Arrangement are prescribed hereunder for kind perusal and consideration:

- **Definition: "Net Billing"** means a single bi-directional energy meter used for net billing at the point of supply where the energy imported from the grid and energy exported from Grid-Interactive Rooftop Solar PV system of a prosumer and the energy imported and exported are valued at two different tariffs.

- **Max. Allowable Rooftop Solar PV Capacity:** The eligible consumer of all categories may install the Rooftop Solar PV System under the Net Billing Arrangement up to 500KW /0.5 MW capacity. However, the min. capacity proposed is 1 KW.

- The maximum Rooftop Solar PV capacity to be installed in any Eligible consumer's premises shall be as under:
    - For residential and Government Consumers: upto a maximum of 100% of consumer's sanctioned load.
    - For Industrial, Commercial and Other consumers: upto a maximum of 80% of sanctioned load/contracted demand of the consumer.
- In case a Rooftop Solar PV System under Net Billing Arrangement, prosumer shall be exempted from banking charges, wheeling charges, cross subsidy surcharge and additional surcharge.
- **Metering:** Under Net Billing Arrangement, bi-directional smart meter as per CEA (Installation and Operation of Meters) Regulations shall be installed at the cost of the prosumer.
- **Energy Accounting and Settlement:**
    - The Distribution Licensee shall undertake meter reading of the bi directional meter, for all prosumers, according to the regular billing period.
    - For each Billing Period, the Distribution Licensee shall make the following information available on its bill to the prosumer:
        a. Quantum of electricity injected by Rooftop solar PV system in the grid in the billing period, showing Initial and Final readings;
        b. Quantum of electricity units consumed by the prosumer from licensee's system in the billing period, showing Initial and Final readings;

c. Units from Solar generation used by the Distribution Licensee for RPO compliance.

- The Distribution Licensee shall purchase entire power injected from the Rooftop solar PV system 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 TGDiscoms, 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 TGDiscoms in the latest previous Financial Year shall be considered.
- The energy supplied by the Distribution Licensee during the billing period shall be billed as per the tariff schedule for respective category of consumer and the terms and conditions of the Retail Supply Tariff Order read with provisions under the Electricity Supply Code Regulation, as amended from time to time.
- The Distribution Licensee shall prepare a net bill comprising of the amount payable by Distribution Licensee and amount payable by prosumer for each billing period:

Justifications:

- Encourage the energy efficiency and self consumption: Net billing incentivize homeowner to consume more of their solar-generated electricity on site, as the compensation for exported energy is lower than the retail rate. This can lead to more efficient energy use and may encourage the adoption of energy storage solutions to maximize self consumption.
- Net billing compensates excess solar energy at a rate reflective of Power Purchase cost, ensuring Discom remains financially sustainable and non solar customers are not subsidizing solar customers.
- Net billing is a simpler mechanism of billing and easy to understand by the consumers.
- This balances the interests of consumers and the DISCOMs.