

UPC RENEWABLES INDIA PRIVATE LIMITED

To

September 5, 2025

The Secretary

Telangana Electricity Regulatory Commission

Sy.No.145-P, Vidyut Niyantran Bhavan

Kalyan Nagar, GTS Colony, Hyderabad

Respected sir,

Sub: Submission of Objections/Suggestions on TGERC Rooftop Solar PV Grid Interactive Systems, Regulation Draft, 2025.

Dear Sir/Ma'am

On behalf of UPC Renewables India Private Limited, a Renewable Energy Project Developer with a commissioned portfolio of more than 600 MWp and an additional 1 GW under execution across Madhya Pradesh, Gujarat, Rajasthan, Karnataka, Maharashtra, and Telangana.

UPC Renewables has been actively engaged in both Commercial & Industrial (C&I) segments as well as utility-scale government projects in multiple states. With our substantial presence and contribution to renewable energy deployment, we are deeply concerned that certain proposed clauses, as detailed below, would hinder renewable energy growth in Telangana and adversely impact both C&I consumers and developers.

We wish to place on record our objections and suggestions to the proposed amendment notified on 14th August 2025 with respect to Solar Rooftop Regulations.

Clause No.	Objections/Suggestions
4.11 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.	- The restriction on Net Metering/Gross Metering/Virtual Net Metering arrangements to avail Open Access deprives the designated consumers from demonstrating compliance with Renewable Purchase Obligation (RPO) targets. This limitation discourages investments in Telangana from high-demand industries, which otherwise could have contributed significantly to the state's clean energy transition. - The TGREDCO Clean & Green Energy Policy already restricts renewable energy open access capacity to the extent of the consumer's contract demand. In addition to this existing limitation, the proposed amendment further restricts consumers who
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.	

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	are availing or will be availed Net Metering / Gross Metering / Virtual Net Metering arrangements from accessing open access benefits, thereby permitting them to avail only one of the two options. As a consequence, Commercial & Industrial (C&I) consumers who have already invested in rooftop solar installations will be rendered ineligible to access renewable energy under the open access mechanism. This effectively prevents them from substituting a significant portion of their conventional grid power consumption with renewable energy. Such a restriction would: A) Limit their ability to meet sustainability and decarbonization commitments, B) Limit their options to procure affordable and competitive renewable power. C) Ultimately diminish the attractiveness of Telangana as a destination for large-scale industrial investment. • Telangana has set ambitious renewable energy deployment targets as part of its long-term energy mix strategy. However, Clause(s) could result in private developers and high-demand consumers holding back on developing captive renewable energy projects in the state. This will directly impact capacity addition, slow down project pipeline growth, and risk the state falling short of its renewable energy share in the overall generation mix, driving further concerns over backing the ambitious targets, 20,000 MW of renewable energy and storage by 2030, with aspirations to expand this to 40,000 MW by 2035 as per the commitment from Honorable Deputy Chief Minister. • Referring to few states who are allowing both Rooftop and Open Access Power ie., Andhra Pradesh, Maharashtra, Uttar Pradesh, Karnataka, Tamil Nadu etc.
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Thanks & Regards,
Dev Jalan
(Regulatory)