

M.P.No. 32 of 2020

As per the direction of the Hon'ble TNERC on 17.11.2020 in M.P.No.32 of 2020 for processing of applications for installation of additional capacity by changing over from Net meter scheme to Net Feed-in scheme the comments of stakeholders are invited on or before 04.12.2020 in M.P.No.32 of 2020 to the Chief Engineer/ Commercial, 2nd floor, Western wing, NPKRR Malligai, 144 Anna salai, Chennai- 600 002 (email id:cecoml@tnebnet.org).

Sd/-

Chief Engineer/Commercial.

**BEFORE THE HONOURABLE TAMILNADU ELECTRICITY REGULATORY
COMMISSION, CHENNAI**

M.P. No. 32 of 2020

In the matter of Solar Net Meter services under Tamil Nadu Solar Policy-2012 -
Processing of applications for installation of additional capacity by
changing over from Net meter scheme to Net Feed-in scheme -
Filing Miscellaneous Petition before TNERC.

Tamil Nadu Generation and Distribution Corporation Limited
Represented by the Chief Engineer/Commercial,
No. 144 Anna Salai,
Chennai 600 002.

..... Petitioner

Vs

Nil

..... Respondent

**PETITION FILED UNDER SECTION 50 AND 86 (k) OF THE ELECTRICITY
ACT, 2003 AND SEC 16(i) OF TNERC CONDUCT OF BUSINESS
REGULATIONS, 2004**

I, S.Stephen Arockiaraj son of Thiru A. Singarayyar, Christian aged 58 years employed as the Chief Engineer/Commercial in Tamil Nadu Generation and Distribution Corporation Limited (TANGEDCO) and having office at 144, Anna Salai, Chennai – 600 002, do hereby solemnly affirm and sincerely state as follows:

1. I respectfully submit that I am the Chief Engineer/Commercial and I am well acquainted with the facts of the case and I am authorized to file the present petition before the Hon'ble Commission on behalf of TANGEDCO.

2. It is respectfully submitted that this petition seeks approval for changeover from Solar Net meter Scheme under Tamil Nadu Solar Policy 2012 to Solar Net Feed-in Scheme under Tamil Nadu Solar Energy Policy 2019 for installation of additional PV capacity within the sanctioned demand in the existing service for the willing consumers under Tamil Nadu Solar Policy 2012.

3. It is respectfully submit the extract of Sl. No. 6 under Restrictions on grid penetration in the Hon'ble TNERC's Order No.3 of 2013 dt.13.11.2013 as follows:

At the local distribution level connectivity to rooftop solar/solar systems shall be restricted to 30% of the distribution transformer capacity on the basis of first come first served. The maximum cumulative capacity in the Distribution Licensee

area shall be limited to the extent prescribed in the Tamil Nadu Solar Energy Policy 2012 and by the Renewal Purchase Obligation(RPO) specified in the Commission's Regulation on year to year basis.

4. It is respectfully submitted that LT solar grid connectivity under net meter scheme under Tamil Nadu Solar Policy 2012 were made up to 30% of the distribution transformer capacity on the basis of first come first served. In order to restrict the connectivity to rooftop solar systems to 30% of the distribution transformer capacity, only new applications for LT solar grid connectivity were processed up to the service connection capacity / sanctioned load of the existing service and applications for installation of additional load for the existing solar services were not allowed.

5. While so, the Tamil Nadu Government released the Tamil Nadu Solar Energy Policy 2019 during 04.02.2019. The Hon'ble TNERC also issued guidelines vide Order No. 03 dt. 25.03.2019. As such applications received on or after 25.03.2019 are registered under Tamil Nadu Solar Energy Policy 2019 accordingly. With respect to Restrictions on grid connectivity, the Clause 8.1 of the Hon'ble TNERC's order no.3 dt.25.03.2019 stipulates as follows:

At the local distribution level, connectivity to rooftop solar systems shall be restricted to 90% of the distribution transformer capacity on the basis of first come first served. The distribution licensee shall update the status of cumulative rooftop solar capacity connected to each Distribution transformer in their website.

6. I respectfully submit that LT solar grid connectivity was sanctioned up to 90% of the distribution transformer capacity on the basis of first come first served. Applications for installation of new LT solar net feed-in services under Tamil Nadu Solar Energy Policy 2019 are being processed up to 90% of the distribution transformer capacity but limited to 100% of the sanctioned/contracted demand of the existing service. Since, the restriction to grid penetration is raised to 90% of distribution transformer capacity, applications for additional capacity in LT solar net feed-in services are being processed as per the above order.

7. It is respectfully submitted that at present there are two schemes of solar rooftop connectivity in TANGEDCO as follows:

(i) Net meter scheme under Tamil Nadu Solar Policy 2012 for the applications registered before 25.03.2019 wherein unit adjustments are made for generation and consumption.

(ii) Net feed-in scheme under Tamil Nadu Solar Energy Policy 2019 for the applications registered on or after 25.03.2019 wherein the money value for the imported energy at the applicable tariff is being adjusted with the money value of the exported solar energy to the grid at the tariff fixed by TNERC.

8. It is respectfully submitted that while applications for new and additional capacity in LT solar net feed-in services are being processed by TANGEDCO up to the sanctioned demand, the applications for additional capacity in LT solar net meter services are not processed due to the restriction in grid penetration. The consumers under solar net meter scheme however are requesting for installation of additional capacity.

9. It is respectfully submitted that to consider the request of consumers in Net Meter Scheme for installation of additional installation of PV plants in either of the two schemes detailed in Para.7 above, there are certain implications which are discussed below:

(i) Net meter scheme under Tamil Nadu Solar Policy 2012:

Permitting additional PV installations under net meter scheme is not feasible of compliance since the net meter scheme no longer exists after 25.03.2019.

(ii) Net feed-in scheme under Tamil Nadu Solar Energy Policy 2019:

If the installation of additional capacity is allowed in the net feed-in scheme, the billing procedure for the existing installation shall be in the net meter scheme and the additional solar PV panels installed shall be under net feed-in scheme. Two different methods of billing cannot be operated on the imported and exported units of a single solar PV installation and hence processing of applications for additional capacity PV installations under net feed-in scheme for the existing net meter service is not feasible.

10. It is respectfully submitted the following to consider the request of the consumers in net meter scheme:

Change over from Net Meter Scheme to Net feed-in Scheme:

If the consumer opts to change over from the net meter scheme to net feed-in scheme to install additional PV installations, the existing solar PV system in net meter scheme under Tamil Nadu Solar Policy 2012 may be changed to solar net feed-in scheme under Tamil Nadu Solar Energy Policy 2019 for the existing installed capacity after obtaining necessary undertaking from the consumer agreeing to change over to net feed-in scheme and then the additional solar PV panels may be installed in solar net feed-in scheme within the sanctioned demand of the existing service.

11. It is respectfully submitted that the billing for the existing installed capacity and the additionally installed capacity of PV plants may be made under net feed-in scheme, under Tamil Nadu Solar energy Policy 2019. By this conversion, the request of the consumers for installation of additional solar PV panels for the existing solar net meter services within the sanctioned demand of the existing service may be met out besides fetching additional revenue by TANGEDCO by the way of billing under net feed-in scheme for the installed capacity of existing solar PV installations in net meter scheme and additional solar PV panels to be installed in net feed-in scheme rather than billing for the adjusted units of export and import in net meter scheme.

Under the said circumstances, it is humbly prayed that this Hon'ble Commission may be pleased to pass an appropriate order for processing applications of willing consumers in solar net meter scheme for installation of additional capacity by changeover from Solar Net meter Scheme under Tamil Nadu Solar Policy 2012 to Solar Net Feed-in Scheme under Tamil Nadu Solar Energy Policy 2019 for the existing installed capacity and installation of additional PV capacity in Solar Feed-in scheme within the sanctioned demand in the existing service after obtaining necessary undertaking from the consumer. The petitioner pays a fee of Rs.10,000/- as per the Tamil Nadu Electricity Regulatory Commission - Fees and Fines Regulations, 2004.

Before me,

Solemnly affirmed at Chennai on this)
29th day of October 2020 and)
the deponent has signed his name)
in my presence.)

sd/-
Advocate

Sd/-

Chief Engineer/Commercial.