Delhi Draft Solar Policy Comments			
Feedback From	**Comment**		**Action**
Planning Department	In order to promote rapid growth of renewable energy sources Planning Department may agree, in principle, to the proposal/policy to rapidly develop decentralized renewable energy sources via rooftop solar power so as to reduce current dependence on unsustainable and centralised fossil fuel energy.	Agreed	No change in draft policy required.
Planning Department	Since the revenue is collected by DISCOMS by the end consumers through electricity billing, it would be appropriate if the GBI is adjusted against electricity bill by concerned DISCOMS to the eligible consumers instead of by SNA directly to consumers from Green Fund as proposed in the Solar Policy. DISCOMs may settle total GBI amount with SNA each quarter. This is because SNA getting directly involved in passing on the benefit to the Consumers may not be practically feasible. However SNA should maintain the details of solar projects and consumer database for proper monitoring and audit purpose. The required budget may be used from the Air Ambiance Fund of Environment Department for which comments / approval may also be taken from Environment Department.	Agreed	New Text: Consumers who wish to avail of the GBI facility shall install a solar energy generation meter as provided for in article 18 of this Policy. The GBI will be based on solar meter readings taken by the DISCOM, and DISCOMS will adjust the amount of GBI against electricity bill of the eligible consumer as is being done in case of transfer of electricity subsidy. DISCOMS will claim the amount from SNA annually and SNA will disburse the amount to DISCOMS.
Planning Department	In case of eligible consumers residing in a multi storied buildings owned by various owners such as Group Housing Societies, DDA Flats, etc. the benefit of GBI to eligible consumers should be suitably apportioned as per financing of the solar plant.	No change	No change in draft policy required, since the electricity generated by solar plants in housing societies will only be sufficient to light up the common areas, and lift etc. Moreover this spect is already been covered in group and virtual net metering

Planning Department	Implementation mechanism and procedure should be clearly mentioned as an Annexure to the policy giving details of the panel of developers of solar plant, the financer who will be financing the cost, approximate cost with respect to various capacity of solar plant, maintenance cost, incentive available from different sources for setting up of the solar plant in Delhi, contact details of the co-ordinator to whom the interested consumers could approach etc. The policy in brief should contain all the relevant information from the perspective of the consumers so that anybody interested for setting up of solar plant can go ahead.	Not agreed	These are the implementation issues and will unnecessarily make the policy document bulkier. Also, any change in this mechanism in future will require Cabinet approval, thus delaying the whole process. Therefore, these details are planned to be worked out by SNA and updated on the website.
Planning Department	With reference to para 13.3 on page 14 of Draft Policy, the name of Planning Department seems to be printed inadvertently. The same needs to be rectified in the aforesaid Policy as “SNA”.	Agreed	Rectified .
Planning Department	The issue of exemption from conversion of house tax to commercial tax for the residential consumers opting to sell the power to the grid has to be examined and commented by Urban Development Department. The exemption of VAT and entry tax on solar panel, invertors etc. has to be examined and commented by Finance Department.	Agreed	Matter has been taken up with UD and finance department

Planning Department	At present Delhi has a capacity of 7 MW grid connected projects for Solar Power. In the budget speech 2015-16, it was proposed to augment the capacity of Solar Power to 14 MW in the current financial year 2015-16. Whereas in the present draft policy, it is proposed to generate 35 MW (cumulative) of solar power during fiscal year 2016 which seems to be much ambitious. Therefore Power Department / EE&REM may be advised to review the proposed target of generating grid connected solar energy and make it on realistic ground so that the target could be achievable.	Agreed	The targets shown in the policy also include the solar power plants installed by various other agencies like Delhi Metro Rail corporation (DMRC), NDMC, CPWD, DJB etc. being part of Delhi. However, the budget speech is related to the Plan Budget of Delhi Government only and there the target of 14 MW by Delhi Government itself shall be achieved. Also, the targets have been kept higher keeping in view RPO obligations of the DISCOMS.
Planning Department	The Power Department may also be advised to organise a one day workshop by inviting all the experts of the Renewable Energy Sector and the concerned representatives from Govt. of India to discuss all the aspects of the solar policy to make it achievable before moving it to the Cabinet for approval.	Agreed	This has been done on 25 August. MOM are in DDC server. - A meeting with principal secretary UD, DDA and 3 municipal corporations also held on 21-Sep - It is also planned to hold a meeting under chairmanship of Chief Secretary on 30.11.2015.
Finance Department	The department shall make necessary budget provision under appropriate head for budgetary support of GNCTD.	Agreed	Shall be done.
Finance Department	The department shall take up the matter with the concerned departments of GNCTD viz. Trade & Taxes Department for exemption of VAT, UD Department for amendment of building bylaws and for exemption of entry tax.	Agreed	Being done.It is also planned to hold a meeting under chairmanship of Chief Secretary on 30.11.2015.

SECI	**General Comment** It may be specified that 3rd party power sale under different business models would be outside the purview of distribution license requirement	On Hold	Shall be done in consultation with DERC.
	Long term policy visibility may be ensured	Agreed	
SECI	Surplus power from projects that are competitively set up may be paid for at the discovered tariff rate till grid parity is achieved. Rationale for this may be illustrated through an example: Suppose a project is set up through a transparent competitive bidding process on the rooftop of consumer under RESCO mode, then rooftop owner would have to make payment to project developer for the entire quantum of power generated at the discovered tariff whereas for the surplus generation to the grid, consumer would realise only the APPC rate. Therefore, the rooftop owner would incur losses. In the absence of tariff parity, this would become a roadblock to widespread implementation of rooftop projects.	Not agreed	Domestic consumer has enough incentive in poilicy with GBI. C&I consumers have their parity achieved, we do not see this as major bottle neck. It is proposed to follow DERC guidelines in this regard.
SECI	There should be tripartite agreements (involving Discom, rooftop owner and project developer) in case of rooftop projects in RESCO mode, to simplify accounting and payments processes, in the absence of tariff parity.	Not agreed	This will further complicate the implementation.However, this may be explored in consultation with Discoms.
SECI	Single window clearance system should be established by Discoms for rooftop projects.	Agreed	Item 1: DISCOMS will establish "single window clearance system" for roof top projects.
SECI	Grid-interactive battery-based systems may also be supported as in the absence of battery, grid-connected rooftop systems are unable to supply power to the consumer during grid outages.	Not agreed	We know this is technically possible. But not clear how policy can intervene here. We cant stop consumers from using battery packs

SECI	Strict compliance measures including penal provisions should be there for noncompliance of regulations. For example, the Haryana Government mandated high-rise buildings to install rooftop systems, but no systems were actually installed due to absence of monitoring mechanisms.	Agreed	Haryana policy was referred, and with due considerations it was decided to mandate only govt building to start with.
SECI	Innovative implementation models may also be looked into. For example L mUltiple daytime loads can be catered to by larger ground-based projects, with some provision of energy storage to improve despatchibility.	Agreed	Policy is not limited to roof top only however does consider roof
SECI	**Specific comments** it is proposed to replace the existing word "lowering" with "optimising"	Not agreed	policy is inteded to lower the costs.
SECI	the word "periodically" may be replaced with "annually /6 monthly"	Agreed	Changed
SECI	**Objectives:**		
SECI	In point no. (v), the statement may be reworded as "promote net metering/gross metering and grid connectivity for all solar plants by simplifying and streamlining processes and methods	Agreed	Changed
SECI	In point no. (x), "quality assurance and longevity of projects" may be inserted after the words "energy efficiency initiatives"	Agreed	Changed
SECI	**Group Net Metering:** In para 1, the phrase "in excess of 100 percent of imported energy" may be l. deleted	Agreed	Changed
SECI	In para 2, "housing societies, RW As" may be inserted after "commercial/industrial	Agreed	Changed
SECI	In para 2, "timely manner" should be replaced with "15 days"	Not agreed	It has been deliberately been left on the descretion of DERC.
SECI	In para 2, it may also be added "a simple format of such written request may be made available on DERC website within 15 days of the policy coming into effect"	Agreed	changed as per wordings

SECI	It would be preferred if Group net metering can be introduced for all consumers who have multiple electricity connections in different locations so as to enable optimum use of available rooftop space in either/both the locations. Also, the requirement of written request to DERC should not be there	Not agreed	Timeline has been defeined until Apr-2017
SECI	**Virtual net metering** In para 2, "RWAs" may be inserted after the word "trusts"	Agreed	Changed
SECI	In para 2, "section 25" may be deleted before "companies"	Not agreed	Section 25 companies should also have the access.
SECI	**10.2 Generation and Sale of electricity to persons other than DISCOM** after state nodal agency, the words "discoms, STU" may also be added	**NA**	Section is removed
SECI	The nature of support may be further clarified. It is important to have support with regard to obtaining of open access, and energy banking. Since solar plants generate mostly for a no. of hours daily, therefore 100% banking facility is very important not only on seasonal basis but also on daily time of day basis(for ground mounted plants).	NA	Section is removed
SECI	**10.3 Solar power plants under schemes announced by Govt. of India** in para 1, the words "or its identified agencies" may be inserted after "MNRE" at two instances	Agreed	Changed
SECI	**11.1 Government/ public institutions** In para 1, the words "canal-top and canal-bank" may be inserted after "floating solar power plants"	Agreed	Changed

SECI	**11.2 Commercial and industrial establishments** Commercial and industrial establishments offer the largest potential for rooftop solar projects, with large roof spaces and high existing power tariffs. This is also the segment where maximum diesel consumption takes place for power generation. Therefore, it is proposed that rooftop systems should be made mandatory for them. It is also proposed that state government should offer some incentives to them, maybe in the form of concessional loans or some other instruments, in order to encourage this segment towards solarisation.	Not agreed	The cost benefit of C&I consumers through solar is proven. Hence no policy mandate / incentives are proposed to such consumers.
SECI	**11.3 Residential consumers** In para 1, the words "banks and RWAs" may be inserted after "Municipal Corporations of Delhi"	Agreed	Changed
SECI	**12 Generation Based Incentives (GBI)** In para I, the word "proposed" may be replaced with "fixed"	Agreed	Changed
SECI	Upfront earmarking of funds should be made for the purpose of offering GBI to consumers.	Agreed	It will be done after getting consent of environment and finnce department.
SECI	**13.2 Exemption on Open Access charges** In addition to waiver of open access charges within the state of Delhi, the exemption should also be given for electricity generated in Delhi but consumed by Discoms/self/3rd parties outside Delhi.	Not agreed	Not required.
SECI	**13.3 Exemption of conversion charges** The sentence "the implementation of rooftop solar energy systems shall be permitted by the State Planning Department, after necessary scrutiny" may be deleted. No permission should be required for individual projects, as it would discourage consumers from adopting rooftop systems. However, the State l. Planning Department may be intimated about new projects by the Discoms/SNA	Agreed	Ongoing discussion with UD. Pending approval

SECI	**13.5 Exemption on wheeling and banlking charges** Provisions of energy banking should also be specified. 100% banking facility, primarily on time of day basis, is crucial to promoting solar projects.	On Hold	To be discussed further. For now the text remains as it is.
SECI	**13.9 COM (Clean Development Mechanism) benefit** The title may be modified as "Benefits under CDM (Clean Development Mechanism) or any other mechanism under UNFCCC"	Agreed	changed
SECI	**13.10 Building Bylaws amendment for rooftop solar installations** In point (c), the words "treated as" may be inserted before the words "temporary structure"	Not agreed	Can be misinterpreted and misused
SECI	**14 Role ofthe State Nodal Agency (EE&REM)** In pOint ii, "and its identified agencies" may be inserted after "Central Government"	Agreed	changed
SECI	In point ii, the phrase" on a first come first served basis" may be deleted	Not agreed	in case of limited funds deletion might create problems
SECI	Also, the para may be reworded to imply that SNA would undertake the process of allotment of power to DISCOMs and facilitate such allotment under Central Government schemes. For state government schemes, it would undertake the process of selection of developers as well as allotment to DISCOMs.	Not agreed	included in original text
SECI	In point iv, the words {{virtual net metering" may be inserted after ({Group net metering". Also, for management of transactions and accounting processes relating to metering, the Discoms are the better-placed agencies for the same.	Agreed	changed
SECI	In point v, in addition to a website, we suggest to also have a toll-free number of handling consumer queries.	Not agreed	Policy need to handle broader issues

SECI	In point vi, for identification of sites for deployment of solar plants under the jurisdiction of the Delhi government, other agencies should also be allowed. Developers/consumers should be free to choose the agency (if any) that would undertake the site identification activities.	Not agreed	With considerable review we believe demand agregation by single entity will help us achieve economy of scale.
SECI	Similarly in point vi, para ii, other government, public and private agencies that are active in the sector should also be allowed in play this role in an unbiased way, in order to have wider reach among consumers. Where no government/public roofs are involved, selection of developers/aggregators should be left at the discretion of the parties involved through mutual negotiations as well.	Not agreed	Same as bove
SECI	In point viii, the words "Central Government" should be replaced by ({State Government". For Central Government schemes, the subsidy would be disbursed by MNRE identified agencies.	Agreed	Changed
SECI	In point x, awareness programmes and capacity building programmes may be carried out by the SNA in association with central agencies as well, and the same may be funded from external sources also, including the Green Fund.	Agreed	Changed
SECI	**15 Role of Discoms** The discoms should publish a list of net-meter manufacturers complying with the necessary technical standards, and consumers should be free to choose their supplier.	Not agreed	DERC to be followed
SECI	The discoms should also come out with a simplified process of filing applications, both physical and online.	Agreed	enough coverage in policy.
SECI	In point 1, the words "and metering" may be inserted after "connectivity".	Agreed	Changed
SECI	In point 4, the words "processes and time taken" may be inserted after the words "application requests".	Not agreed	Not required.
SECI	In point 5, the nominal fee to be collected by Discom should be specified upfront.	On Hold	To be discussed with DERC. INR 500 is proposed.

SECI	**16 Role ofIPGCL** The title may be made as "Role of IPGCL and other MNRE identified Agencies" in order to avoid monopoly of any particular organisation and give consumers the benefit of more options to choose from.	Not agreed	covered above
SECI	**17 Role of Consumer and Solar Plant Developer** The words "and other agencies of the State government/Central government" may be inserted after "SNA".	Not agreed	covered above
SECI	**19.1 Monitoring of parameters** In para 1, the words "in association with Discoms" may be inserted after the word "SNA".	Agreed	Changed
SECI	In para 1, the word "online" may be inserted before the word "infrastructure"	Agreed	Changed
SECI	In para 1, the words "and dissemination" may be inserted after the word "record"	Agreed	Changed
SECI	The monitoring report may be submitted to the SNA or any other authorised agency. The generation data should be made available in public domain	Not agreed	Little more burden on DISCOM
SECI	**20 Empowered Committee** A member from NDMC may also be included in the committee. In addition, special invitees from MNRE or its authorised agencies, CERC and CEA may be called when committee is in session.	Agreed	Changed
SESI	In Delhi solar policy, SESI proposes to Delhi Government that by way of financial supporters, could arrange capital, which will be available for financing the developer/installation by way of reasonable rate	Agreed	We would like to take it forward.
SESI	To encourage the developer, SESI proposes a Rebate in property tax / house	Agreed	Already there
SESI	Differential tariff in your solar policy. We believe that this enhances our mission for make in India	Not agreed	Differential tariffs are not possible at this point in time.
SESI	In Net Metering, domestic connection, GBI is to be for 5 years, whereas it is proposed for 3 years in draft. The Green Fund may please be enhanced.	Not agreed	GBI is well thought upon and limited to 3 years.

SESI	The GBI cap limit may please be enhanced to 15000 Kwh capacity instead of the one mentioned in policy as 1500 Kwh for 5 years. As this policy will be reviewed after 5 years	NA	1500 units / Kwp is the limit. One can go as much
SESI	The GBI should be applicable to DCR only.		Not clear
TPDDL	Also please note that timeline mentioned as 15 days in clause 15.5 in this draft, is contradictory to DERC Guidelines and should be removed.	Agreed	New Text: DISCOM shall replace the consumer's existing service connection meter with a bidirectional vector summation meter in accordance with the netmetering guidelines provided by DERC
TPDDL	Any infrastructure associated cost for the purpose of installation of the Solar PV plant, including but not limited to Network Augmentation shall be borne by the owner of the Solar Project. The Discom will arrange for network augmentation with approval from DERC on case to case basis.	Agreed	New Text: Evacuation infrastructure shall be developed and augmented, wherever necessary, by the State Transmission Licensee and/or the DISCOM, as the case may be. Any infrastructure associated cost for the purpose of installation of the Solar PV plant, including but not limited to Network Augmentation shall be borne by the owner of the Solar Project.
TPDDL	Clause 15.1 (Role of Discom): The State Electricity Distribution Licensees (DISCOMS) shall extend their support in installing solar power plants and their connectivity with their grid network through augmentation of Distribution Network if necessary. They shall comply with the regulatory framework specified by the DERC and provisions contained in this Policy.	Not agreed	No change

TPDDL	4. vii. Provide generation based incentives for all consumer segments since solar power costs are yet to achieve parity for most users, as well as tax exemptions and waivers.	Not agreed	Not needed for commercial consumers for now.
TPDDL	5. 5. To help achieve the solar capacity targets outlined in section 9 of this Policy, the Delhi Electricity Regulatory Commission (DERC) shall determine annual Solar Renewable Purchase Obligation (RPO) targets for the DISCOMS, at a commensurate level with the solar projects achieved through this Policy. All solar energy generated at a metered connection site in a DISCOM's territory shall count towards that DISCOM's RPO target.	Agreed	Rephrased as needed. Any net metered connection makes absolute sense to be counted as DISCOM RPO. This gives incentive to DISCOMs to promote netmetering.
TPDDL	9. Target Capacity By August 2015, Delhi had installed 7 MW of rooftop solar capacity. To achieve its solar power generation targets, this Policy mandates solar installations—to be completed within 5 years— on all government--owned rooftops. Solar adoption will be encouraged via a limited time generation--based incentive for all other segments (see details in section 12).	Not agreed	Not needed for commercial consumers for now.
TPDDL	Group Net Metering: This clause may be removed at present form.	Not agreed	Essential for the policy roadmap
TPDDL	Virtual Net Metering: This clause may be removed at present form	Not agreed	Essential for the policy roadmap
TPDDL	10.2 Generation and sale of electricity to persons other than DISCOM	Agreed	Removed

TPDDL	11.2 Commercial and Industrial establishments The State shall encourage the deployment of solar plants with net metering on all commercial and industrial buildings with available rooftop areas, by providing incentive or through other methods. Such establishments shall, in all cases, install such plants within a period of 5 years from the date of notification of this policy. It will be mandatory for all new and upcoming buildings and all existing Hotels, Shopping Malls, Commercial Complex and Banquet halls (with plot size of minimum 500 Sq. Yards) for installation of rooftop Solar project with minimum 50% shadow free rooftop area.	Not agreed	Mandate in C&I segment is not envisioned in policy.
TPDDL	11.3 Residential consumers The State shall encourage the installation of solar plants with net metering on all residential buildings, colonies, townships, housing societies, private bungalows, farm houses, etc. by providing incentive and other benefits. It will be mandatory for all upcoming/ proposed/ under-construction buildings (with plot size of minimum 500 Sq. Yards) for installation of rooftop Solar project with minimum 50% shadow free rooftop area	Not agreed	Mandate in domestic segment is not envisioned in policy.
TPDDL	12. Subsidy/Generation Based Incentive: The State shall offer a limited--time GBI for net metered connections for all consumers. This GBI will reduce payback time and increase adoption. A GBI of INR 2.00 per unit (kWh) of gross solar energy generated is proposed for all buildings installing Solar PV plants during the Policy Period for a period of 3 years from the date of installation, starting from 1st January 2016 and for the Industrial, Commercial and other Private Consumers a GBI of INR 1.00 per unit (kWh) of gross solar energy generated is proposed for all Solar PV plants installed during the policy period for a period of 3 years from the date.	Not agreed	Not needed for commercial consumers for now.

TPDDL	13.10 Building ByLaws Amendment b) No approval will be required from concerned Municipal Corporation or other Urban Development Bodies like the DDA for putting up solar plants including any additional system for monitoring performance of solar plant in existing or new buildings. c) The support structure on which rooftop solar panels are installed shall be a temporary structure. Such support structure will be complying with below IS standards –		b) Accepted and updated C) not accepted. Appropriate wordings are used to communicate the message. Listing standards in policy is little too much details.
TPDDL	13.2 Exemption on open access charges There shall be no Open Access Charges during the Operative Period of the Policy if the solar electricity is generated and consumed within the State. Any Open Access Consumer seeking to avail this benefit must seek approval from the DERC on the same, which shall be communicated to the DISCOM or Licensee in a manner as may be specified by the DERC.	On Hold	To be discussed with DERC.
TPDDL	13.6 "Must Run" status All solar power systems shall be treated as 'Must Run' power plants and shall not be subjected to Merit Order Rating (MOR) / Merit Order Dispatch (MOD) principles Provided that the DISCOM/Licensee shall have the absolute discretion to seek shutdown of such plants in case of any maintenance work being undertaken on any connected distribution lines/transformers for maintaining the safety of its employees Provided further that the GNCTD shall extend all assistance for surrender/ reallocation of power from conventional sources commensurate to the solar power resources commissioned in the state so as to ensure consumers are not burdened with excess allotment of power pursuant to this policy. Provided that DISCOMs shall be exempted from payment of UI charges (Unscheduled Interchange charges) and DSM	Not agreed	Safety related shut down discretion are included in separate section now.
TPDDL	15. 5. Consumer request for connection and timelines shall be governed by DERC Net Metering Regulations, 2014 and the guidelines thereto.	Agreed	Rephrased as needed.

TPDDL	15. 6, For monitoring of Solar Project, Smart Net Meters will be installed with facility for registration of Import and Export Units. The metering and billing arrangement should comply with DERC Net Metering Regulations and Guidelines, Central Electricity Authority (Installation and Operation of Meters) Regulations and its amendments as applicable. Cost of these meters shall be suitably treated as per the relevant regulations of the DERC	Not agreed	smart meters are outside purview of this policy.
TPDDL	15. 7. For solar plants connected with voltage level of 11 KV and above, inspection by an Electrical Inspector appointed by the Delhi Government shall be required to ensure quality, safety, and compliance before commissioning as per Central Electricity Authority (Measures relating to Safety and Electric Supply) Regulations, 2010. For Solar Plants connected at voltage level below 11 KV, the consumer shall be responsible for compliance to safety parameters. Respective Discoms will conduct the inspection and verification of measures related to safety parameters before installation of Net Meters. Consumers will be facilitating the Discoms for such verification.		Power department suggestion is that the system capacity above 200KW
TPDDL	Safety For any Distribution Network related activity, the concerned Discom will take necessary measures related to safety of people and property. The Consumer will comply with all necessary prerequisites for this purpose as advised by the Discoms including but not limited to temporary shutdown of the Solar Projects if necessary.	agreed	included in point 7 of section 15
TPDDL	Improvement Measures by Discoms Discom will plan and implement necessary improvement measures like limiting Harmonics, introduction of Storage and other complimentary DER like ADR etc. to cater large scale implementation of solar Projects. Delhi Govt. and DERC will facilitate such initiatives through approval and allowance of CAPEX through Discom's ARR.	Not agreed	

TPDDL	Capacity Augmentation of Distribution Network Any infrastructure associated cost for the purpose of installation of the Solar PV plant, including but not limited to Network Augmentation shall be borne by the owner of the Solar Project. The Discom will arrange for network augmentation with approval from DERC on case to case basis.	agreed	Included in section 19.
Auroville	Article 5: I have made the suggested changes since the Discom should be authorised to collect a nominal fee irrespective of whether the existing meter is reprogrammed or whether a new meter is installed. In almost all cases the Discom will opt for replacing the meter since configuration programming in the field may not be practical. They will deploy the old meter in another existing or new service connection. It is for this reason (the re-deployment) that we had agreed that only a nominal fee needs to be collected and not the full cost of a new meter. Also there will be some static meters of lesser known manufacturers that cannot be reprogrammed by the Discom. Therefore to avoid any misunderstandings in this regard, it seems best to leave the decision of reprogramming or replacing to the Discom and allow them to charge a nominal fee in both cases. The revised draft of this article 5 also takes care of the replacement of non-static meters.	Agreed	

Auroville	Article 8: I have not made any changes but this article needs attention. There must be a rule in Delhi (like in other states) that stipulates which generating equipment and of what capacity needs inspection by an Electrical Inspector. If “X” kW is the limit beyond which the Electrical Inspector comes into the picture, I would restate article 8 as follows (two options given): “8. Solar Plants shall be inspected by an Electrical Inspector appointed of the Delhi Government if the capacity of the solar plant exceeds the capacity referred to in [state the rule / law / regulation]. “8. For solar plants with a capacity above X kWp the consumer shall obtain a Safety Certificate from an Electrical Inspector of the Delhi Government.”	Agreed	This rule was not clear so far, Power department took a note of this in last 2-3 months, and the new order has been issued
Auroville	Article 17: Please note that article 17 mentions a threshold of 150 kW for “a release form”. It is not clear from this article what needs to be done for solar plants of a capacity larger than 150 kW. Articles 8 and the second part of 17 (starting from “Before commissioning ..”) may be combined into one article with clarity on what the consumer needs to do, similar to what I have drafted above for article 8.	Agreed	Clarified in the policy wording. Also note that the limit is actually 200KWp as per the new order under approval.
Home Department	No comments	Agreed	
IPGCL	Addition on section 10. Various government organization having scattered electricity connection at different location in the licensee area of same DISCOM will be allowed to avail credit for other locations / connections in case the solar power generation from ta location is excesss to its own consumption in a billing cycle. Accordingly under the scheme all the meter connections of one entity/ organization will be treated as one connection . group net metering for this purpose	No change	Already elaborated in policy text.

IPGCL	Section 16-a) add " rooftop other than of govt building having capacity abpve 50KW under MNRE / state scheme / ground mounted capacities under MNRE / state schemes," after government rooftops add " solar power developer and will chanrge for services from bidders/ solar power developer" after process of selection add " chargeable from SNA on account of Greeen fund / other such acccount" after inputs for the tender.	Agreed	Accepted with certain changes
IPGCL	Representatives of IPGCL / PPCL should also be included as member of EC	Agreed	Accepted. DTL MD, replaced by IPGCL MD.
IPGCL	Role of IPGCL - Point No.16. IPGCL also to undertake Solar PV installations under CAPEX model with budgetary support from GNCTD.	Agreed	As per Govt. orders regarding single agency for tendering.
Home Department	No comments		
DERC	The target capacityoutlined under Clause 9 of the draft policy for solar may not be linked with the RPO targets, as non-materialisation of the proposed capacity addition may require purchase of Renewable energy Certificate by the obligated entity (Discoms). Hence, higher targets will necessitate further purchase of REC's and thus will increase burden on the consumers of electricity of Delhi. therefore, it may be appropriate to leave the setting of RPO target to the commission in accordance with the Electricity Act 2003.	Agreed	Necessary amendments done.

	Further, the target set under the draft policy appears to be on higher side as solar energy being infirm in nature requires appropriate estimation of suitable percentage mix of Renewable energy in total power procurement portfolio. The commission opines that the projections may be made based upon the average load and not on the peak load, as the peak load is for a certain duration only and does not indicate the correct load pattern of Delhi.	Not agreed	The generation from solar PV plants is quite low compare to the installed capacity vis.a.vis thermal and hydel plants. Moreover, these targets are spread over next ten years and the increase in demand of power has also been kept in view. If we consider an annual increase in demand @ 6% then it nullifies the effect as envisaged by DERC. Therefore, the targets are not on higher side.
DERC	the policy should provide for periodic review of the target capacity outlined under Clause 9 of the draft policy.	Agreed	Necessary amendments done.
DERC	The basic framework of Group Net Metering has to be prepared in consultation with the State Commission which involves issues like Open Access, type of connection used at different places, tariff category and settlement of the same. Therefore, it is recommended that pending finalisation of the same, following lines of first para under clause 10.1 (Group Net Metering) of draft policy may be deleted: - "At this time, Group Net metering has been approved for all government buildings."	Agreed	Necessary amendments done.
DERC	Second para under Clause 10.1 (Group Net Metering) of draft policy may be rephrased as under: -"The state government shall work with DERC to develop Group Net Metering framework, pending finalisation of the framework. The consumers who wish to avail Group Net Metering facility shall make a written request to DERC, which shall review the requests in a timely manner on a case....by...case basis."	Agreed	Necessary amendments done.

DERC	Third para under Clause 10.1 (Virtual Net Metering) of draft policy may be rephrased as under: - "The state government shall work with DERC to develop Virtual Net Metering framework for all consumers no later than 1 April, 2017."	Agreed	Necessary amendments done.
DERC	As per provisions contained in the Electricity Act 2003, the open access charges are to be determined by the State Commission and to protect the larger interest of consumer, it is believed that exemption of all open access charges may lead to undue burden on the Consumers of Electricity of Delhi. therefore, clause 13.2 (Exemption on Open Access charges) of draft policy may be rephrased in accordance with the Electricity Act 2003 as under: - "The State Government in consultation with State Commission may prepare a sutiable framework for Open Access charges for Solar electricity generated or consumed within the state".	Agreed	Necessary amendments done.
DERC	In clause 15.5, it is stated that the issue regarding detailed procedure of application and release of connection with timelines is already addressed under DERC Net Metering for Renewable Energy Regulations and guidelines thereof. Hence this clause may be aligned with the Regulations.	Agreed	Necessary amendments done.
Legal Department	It may be informed that it is not possible to offer any comments on the letters. Therefore, if approved, we may request the administrative department to place the matter in the concerned file of the Department and thereafter send the file to this Department for examination.	Agreed	The file shall be sent to Law Department for legal vetting.

Pushpanjali RWA	Section 5 Para 8: DERC feed in tariff should be the same or higher than the tariff charged by DISCOM as otherwise DISCOM resells solar power generated by residents at a huge profit. For example BSES charges approximately Rs.10.50 per KWH including taxes if a house consumes more than 1200 units per month. DERC proposal to reimburse Rs.5/ per unit does not provide sufficient incentive to owners. Tamil nadu and Karnataka provide Rs.12.49 and Rs.9.56 feed-in tariffs respectively.	Not in purview of policy.	The concept of separate feed in tariff has not been kept in the DERC. DERC in the guidelines and regulations for net metering has maintained that the surplus energy fed into the grid shall be paid for by the Discoms @ average power purchase cost of Discoms and this shall be decided by DERC.
Pushpanjali RWA	Section 12. the policy does not address existing residential rooftop solar installations in Delhi which required much higher investment. These should be automatically included for Generation Based Incentives. GBI should be tied to monthly billing cycle by DISCOM and not to financial year so residents can see immediate benefit and recommend it to others.	Agreed	Section 12 of the Policy clearly recommends Generation Based Incentive (GBI) for existing and future net metered connection. The Discoms will adjust the amount of GBI against electricity bills of the eligible consumers on monthly basis. However, Discoms will claim the amount from SNA annually.
Pushpanjali RWA	Section 13.4 - Small inverters suitable for residential use are currently not available in India. These should be allowed to be imported free of customs duty to reduce cost.		Does not fall under the purview of the policy being Central Govt. issue.
Pushpanjali RWA	Section 15 Para 5. DISCOM are charging Rs.7500 - to replace existing meter with bi-directional meter. This charge is exorbitant given that mechanical meters are available for Rs.600. furthermore, meters which are removed should be recycled after being reset rather than being put into storage.		As per Section 35 of Supply Code issued by Delhi Electricity Regulatory Commission, the consumer has the right to buy the meter from the market which is compliant to the CEA regulations and fulfilling all the standards specified by DERC.

Pushpanjali RWA	RWA's can pay a key role in bulk sourcing and publicity in residential areas hence they should be given some form of incentive linked to solar penetration in the area.		It is proposed to hold workshop in association with RWAs to increase the solar penetration.