

RAJASTHAN ELECTRICITY REGULATORY COMMISSION, JAIPUR

Petition No. 2332/2025

In the matter of the Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) (Third Amendment) Regulations, 2025

Coram:

**Dr. Rajesh Sharma, Chairman
Sh. Hemant Kumar Jain, Member**

Date(s) of hearing: 18.07.2025 and 15.09.2025

Date of Order: 13.10.2025

Memo on Statement of Objects & Reasons and consideration of comments/suggestions, received from various stakeholders:

Background:

1. The Rajasthan Electricity Regulatory Commission ('RERC' or the 'Commission'), in the exercise of the powers conferred by Section 86(1) (e) read with Section 181 of the Electricity Act, 2003 (Act 36 of 2003) published the following draft Regulations (hereinafter referred to as 'the draft Regulations') for making amendments in RERC (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations 2021, namely:

"Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) (Third Amendment) Regulations, 2025"

2. These Draft Regulations, along with the Explanatory Memorandum and Public Notices, were placed on the Commission's website to invite comments from interested persons. Comments/suggestions were also invited through Public Notices published in the following newspapers on the dates indicated next to each.

(1) Dainik Bhaskar : 27.05.2025

- (2) Rajasthan Patrika : 27.05.2025
- (3) The Times of India : 27.05.2025

3. The last date for the interested persons/ public to submit comments/suggestions was 16.06.2025. Four (4) stakeholders mentioned at **Annexure-I** offered their comments/suggestions on the Draft Regulations and Explanatory Memorandum, which the Commission considered while finalising the Regulations.
4. The matter was heard on 18.07.2025, during which the Discoms sought time to file their additional submissions. The list of stakeholders present during the hearing is enclosed as **Annexure-II**. Thereafter, the Discoms filed their additional submissions on 12.08.2025. Considering the gravity and significance of the additional submissions and their potential impact on consumers, the Commission, in the interest of transparency and wider stakeholder consultation, directed that the additional submissions regarding amendment in Regulation be further published for inviting further comments/suggestions from stakeholders. Accordingly comments/suggestions were again invited through Public Notices published in the following newspapers on the dates indicated next to each.

- (1) Dainik Bhaskar : 03.09.2025
- (2) Rajasthan Patrika : 03.09.2025
- (3) The Times of India : 03.09.2025

5. The last date for the interested persons/ public to submit comments/suggestions was 12.09.2025. Nine (9) stakeholders mentioned at **Annexure-III** offered their comments/suggestions on the proposed amendments (additional submissions), which the Commission considered while finalising the Regulations.
6. The matter was finally taken up for hearing on 15.09.2025, and after affording full opportunity of hearing to the Petitioner Discom as well as to

the stakeholders present, and upon consideration of the detailed submissions and arguments advanced by them, the matter was reserved for orders.

7. The main comments and views expressed by the stakeholders through their written submissions and during the hearing, along with the Commission's analysis and views thereon, have been summarised in the following paragraphs. For ease of reference, the comments/suggestions have been appropriately grouped and categorised depending on their nature and relevance. All suggestions submitted by stakeholders have been duly considered, and the Commission has elaborated upon such suggestions, together with its views and decisions thereon, in the Statement of Objects and Reasons. It is clarified that if any particular suggestion has not been specifically elaborated, the same should not be construed as having been disregarded or not considered. Further, changes relating to syntax, phrase, addition of word(s), or other rewording of a drafting nature have also been incorporated wherever necessary and in the regulations have been renumbered appropriately.

Part I Preliminary

Regulation 2: Definitions:

Amendment Proposed:

“ (i) *In these regulations, unless the context otherwise requires,*

(j) *"Eligible Consumer" or "Participating consumer" means a consumer of electricity in the area of supply of the Distribution Licensee, who uses or proposes to use a Renewable Energy generating system, to offset all or part or no part of the consumer's own electrical requirements, given that such systems may be owned and / or, operated by such consumer or Distribution Licensee or RESCO".*

"Group Net Metering" means an arrangement whereby surplus energy generated / injected from a Renewable Energy System situated in single location or Battery Energy Storage System (BESS) charged through Renewable Energy System is exported to the grid through Net Meter and the exported energy is adjusted in more

than one electricity service connection(s) of the same consumer located within the same distribution licensee's area of supply;

"Virtual net metering" means an arrangement whereby entire energy generated / injected from a Renewable Energy System situated in single location or Battery Energy Storage System (BESS) charged through Renewable Energy System is exported to the grid from renewable energy meter/ gross meter and the energy exported is adjusted in more than one electricity service connection(s) of participating consumers located within the same distribution licensee's area of supply;"

Stakeholders' Comments/Suggestions:

8. The stakeholders have mainly submitted as follows:

- 8.1 Regulation 2.1(1): It should also replace the term 'consumer' with a new term coined for the purpose 'prosumer'.
- 8.2 In this, for 'Group Net Metering', the electricity connections taken by the 'Society' in the residential society for 'common utility' at present and the domestic electricity connections taken by the residents on the number or name of their respective houses and their metering and billing system should also be clarified.
- 8.3 The distance and location of the place (village, city, sub-city, locality etc.) of the renewable energy system and the location of its participating consumers in Virtual Net Metering should also be clarified because the term within the supply area of the distribution licensee is vague.

Discom's reply:

9. The Discoms have mainly submitted as follows:

- 9.1 The term 'consumer' in the proposed draft Regulations is sufficient because all category consumers are eligible.
- 9.2 Metering and Billing provisions already is in the proposed Regulations.
- 9.3 Provision regarding location has already included in the Annexure-A and Annexure-B.

9.4 To clarify, installations installed under metering mechanisms like Group Net Metering and Virtual Net Metering shall also be eligible for CFA if the metering arrangement is approved by the DISCOM. Therefore, Commission may consider specifying any specified location (like rooftop/balcony or above elevated structures/land/water bodies) for use of RE sources under VNM and GNM mechanism.

Commission's Analysis/decision:

10. The stakeholders suggested replacing the term 'consumer' with 'prosumer' in Regulation 2.1(1), sought clarity on treatment of society-level and individual connections under *Group Net Metering*, and requested specification of distance/location criteria under Virtual Net Metering. In response, the Discoms submitted that the term 'consumer' is appropriate as all categories are eligible, provisions on metering and billing are already covered, and location aspects are addressed in Annexure-A and Annexure-B; further, they requested the Commission to specify permissible locations such as rooftops, balconies, elevated structures, land, or water bodies.
11. After considering the submissions, the Commission is of the view that no change is required in the proposal of the Discoms and proposed amendment in the Regulations is acceptable and accordingly regulation 2.1 shall be amended as below;

The existing sub regulation 2.1 (j) shall be substituted with the following:

"(j) 'Eligible Consumer' or 'Participating consumer' means a consumer of electricity in the area of supply of the Distribution Licensee, who uses or proposes to use a Renewable Energy generating system, to offset all or part or no part of the consumer's own electrical requirements, given that such systems may be owned and / or, operated by such consumer or Distribution Licensee or RESCO".

New definitions shall be added after sub regulations 2.1(cc) as under:

" 2.1(dd) Virtual net metering(VNM)" means an arrangement whereby entire energy generated / injected from a Renewable Energy System situated in single location or Battery Energy Storage System (BESS) charged through Renewable Energy System is exported to the grid from renewable energy meter/ gross meter and the energy exported is adjusted in more than one electricity service connection(s) of participating consumers located within the same distribution licensee's area of supply;"

"2.1(ee) Group Net Metering (GNM)" means an arrangement whereby surplus energy generated / injected from a Renewable Energy System situated in single location or Battery Energy Storage System (BESS) charged through Renewable Energy System is exported to the grid through Net Meter and the exported energy is adjusted in more than one electricity service connection(s) of the same consumer located within the same distribution licensee's area of supply;

12. It is also clarified that renewable energy plants under VNM and GNM may be installed on rooftops, balconies, land, water bodies, or on elevated structures fixed on any of these locations.
13. Further, for the purpose of implementing Virtual Net Metering (VNM) and Group Net Metering (GNM), certain minor modifications have been made in Regulation 3 pertaining to Scope and Availability. Considering the submissions received from various stakeholders and keeping in view the potential of *Peer-to-Peer (P2P) Energy Trading* and *Plug and Play Solar Systems*, the Commission is of the considered view that enabling provisions for these mechanisms should be incorporated in the said regulation. The Commission also concurs with the restrictions proposed by the Distribution Licensees, that a consumer who has opted for a *Net Metering* arrangement shall be permitted to enter into a *Group Net Metering* or *Virtual Net Metering* arrangement only after termination of the existing connection agreement, and that a *prosumer* having a *Net Billing* arrangement shall not be entitled to avail *Virtual Net Metering* or

Group Net Metering arrangements under these Regulations. Accordingly, Regulation 3 of the Principal Regulations shall be amended as below to incorporate the above provisions:

The existing sub regulation 3.2 main provision shall be substituted with the following:

- “(a) Net Metering arrangements;*
- (b) Net Billing arrangements;*
- (c) Group Net Metering (GNM)*
- (d) Virtual Net Metering (VNM)*
- (e) Peer to Peer (P2P) Trading*
- (f) Grid Interactive Distributed Renewable Energy generating systems connected behind the meter and operating in parallel with Distribution Licensees' grid and who have not opted either for Net Metering arrangement or Net Billing arrangement or Virtual Net Metering or Group Net Metering;*
- (g) Plug and play solar system”*

New provisos below existing provisos in sub regulation 3.4 shall be inserted as following:

“Provided also that, the consumer, who has opted for Net Metering arrangement, shall be allowed to enter into GNM or VNM only after termination of existing connection agreement.

Provided further that A prosumer having Net billing arrangement will not be entitled for virtual net metering or Group net arrangement under these Regulations.”

Regulation 8: Procedure for application

Discom's Proposal:

“8.8 For installation of Renewable Energy Generating systems, the technical feasibility study shall be completed within a period of fifteen days and the outcome of the study shall be intimated to the applicant, failing which it shall be presumed that the proposal is technically feasible.

Provided that the applications for Renewable Energy Generating systems up to 10 kW capacity under only Domestic Category, except under Virtual Net Metering or Group Net Metering arrangement, complete in all respects shall be deemed to have been accepted without requiring technical feasibility study and any commensurate enhancement of the

sanctioned load of the consumer, as may be required, shall be carried out by the Distribution Licensee. For connections falling under other than domestic category, no such facility of deemed feasibility shall be provided."

Commission's Analysis/decision:

14. In the considered view of the Commission, the success of schemes such as Virtual Net Metering (VNM) and Group Net Metering (GNM) is critically dependent upon ensuring ease of doing business and providing a time-bound framework for completion of the associated procedures and formalities. The Commission is of the opinion that unnecessary procedural requirements create avoidable delays and discourage consumer participation, thereby undermining the larger policy objectives of promoting renewable energy deployment. It is, therefore, imperative to streamline the process while balancing the need for system integrity and operational safety.
15. In this regard, the Commission is of the considered view that for domestic category consumers, there shall be no requirement for conducting a technical feasibility study for projects having a capacity of up to 10 kW under the Virtual Net Metering (VNM) or Group Net Metering (GNM) arrangements. This is in line with the existing dispensation applicable under the Net Metering framework, wherein the requirement of conducting technical feasibility has already been waived for capacities up to 10 kW. Such exemption will facilitate expeditious adoption of these schemes by the residential sector, which forms a significant consumer base and has considerable potential for distributed renewable energy deployment.
16. Further, in the case of other consumer categories, as well as for projects having a capacity above 10 kW, the requirement of a technical feasibility study shall continue to apply. However, in order to ensure that such studies do not result in undue procedural bottlenecks, the Commission directs that the technical feasibility study shall be completed

within a period of fifteen (15) days in the case of existing consumers or generators already connected to the system. For new consumers or generators seeking fresh connectivity, the technical feasibility study shall be completed within a period of thirty (30) days from the date of receipt of the complete application. Accordingly, the Commission deems it appropriate to amend Regulation 8.8 of the Draft Proposal to reflect the above stipulations in order to align with the principles of efficiency, transparency, and consumer facilitation. As follows:

The existing sub regulation 8.8 shall be replaced with the following:

"For installation of Renewable Energy Generating systems, the technical feasibility study shall be completed within a period of fifteen days and the outcome of the study shall be intimated to the applicant, failing which it shall be presumed that the proposal is technically feasible.

Provided that the applications for Renewable Energy Generating systems up to 10 kW capacity under only Domestic Category, under Net Metering or Virtual Net Metering or Group Net Metering arrangement, complete in all respects shall be deemed to have been accepted without requiring technical feasibility study and any commensurate enhancement of the sanctioned load of the consumer, as may be required, shall be carried out by the Distribution Licensee. For connections falling under other than domestic category, no such facility of deemed feasibility shall be provided.

Provided also that for Virtual Net Metering or Group Net Metering , in the case of existing consumers or generating system already connected to the system, the technical feasibility study shall be completed within a period of fifteen (15) days and the outcome of the study shall be intimated to the consumers, failing which it shall be presumed that the proposal is technically feasible.

Provided further that for Virtual Net Metering or Group Net Metering, in case of new consumers or generating system seeking fresh connectivity, the technical feasibility study shall be completed within a period of thirty (30) days and the outcome of the study shall be intimated to the consumers, failing which it shall be presumed that the proposal is technically feasible.

Provided also that for Virtual Net Metering or Group Net Metering, connectivity to the consumer or generating system, shall be granted by the Distribution Licensee within thirty (30) days from the date on which the consumers or generating system is declared technically feasible or deemed technically feasible, as the case may be."

Regulation 10: Interconnection with the Grid: Standards and Safety

Discom's Proposal:

"10.15. The technical standards & power quality standards of BESS shall be as per Annexure - VII of these Regulations or any other standards as may be specified by CEA/Ministry of Power (MoP) from time to time."

Commission's Analysis/decision:

17. Since no comments were received from stakeholders and the proposed amendment is in line with the settled approach, the Commission finds it acceptable and accordingly provides that the technical standards and power quality standards of BESS shall be as per Annexure-VII of these Regulations or any other standards as may be specified by CEA/Ministry of Power (MoP) from time to time.

Regulation 12: Energy Accounting and Settlement

Discom's Proposal:

"15. Group and Virtual Net Metering arrangement:

15.A.1 The Eligible Consumer may install the Renewable Energy generating system under the Group net Metering arrangement and Virtual Net metering arrangement specified in these Regulations, subject to following proviso that the system,

(a) shall be within the permissible technical limits as defined under these Regulations.

(b) shall operate safely in parallel with the Distribution Licensee's network.

Provided that Group Net Metering arrangement and Virtual Net Metering arrangement shall be applicable to domestic category and Government Connections only.

15.A.2. Consumers having pending arrears with the Distribution Licensee shall not be eligible for Group net metering and Virtual net metering arrangement under these Regulations:

Provided that, where there is a dispute between the Distribution Licensee and the consumer, relating to any charge for electricity, such consumers shall be allowed Group Net Metering arrangement and Virtual Net Metering arrangement, pending such resolution of such dispute upon deposit of the disputed amount with the Distribution Licensee in accordance with Section 56 of the Act.

15.A.3. Group Net Metering arrangement and Virtual Net Metering arrangement specified in these Regulations through Renewable Energy Service

Company (RESCO) owned Renewable Energy generating system or, Utility Led Aggregator developed or owned Renewable Energy generating system shall be permitted:

Any land owner may lease out / rent the Rooftop Space/ Land/ Water bodies to a RESCO or Utility Led Aggregator on a mutual commercial arrangement for setting up Renewable Energy generating system under any arrangement specified in these Regulations. The Distribution Licensee will not have any role in such mutual commercial arrangement under RESCO mode.

- 15.A.4. The maximum Renewable Energy generating system capacity to be installed shall not exceed 100% of the cumulative Sanctioned Load/ Contract Demand of the participating consumers/connections:

Provided that, the eligible Sanctioned Load/ Contract Demand of the individual participating consumers/connections shall be capped at ten kilowatts (10KW) for Domestic Category only (i.e. no such capping for Government Connections opting for Virtual Net Metering or Group Net Metering) under these Regulations.

Provided that the capacity of Renewable Energy generating systems shall be in conformity with the provisions relating to Sanctioned Load/ Contract Demand permissible under the Rajasthan Electricity Regulatory Commission (Electricity Supply Code & Connected Matters) Regulations, 2021 and subsequent amendments thereto.

- 15.A.5. The capacity of Renewable Energy generating system to be installed under Virtual net metering or, Group net metering shall be more than one kilo watt subject to the following conditions:

Provided that, the capacity of Renewable Energy generating system to be installed shall be up to one mega-watt under Virtual net metering or, Group net metering arrangements specified under these Regulations:

Provided further that, in case the Eligible Consumer intends to install Renewable Energy generating system having capacity of more than one mega-watt, terms and conditions of such arrangement shall be governed as per the Rajasthan Electricity Regulatory Commission (Terms and Conditions for tariff determination from Renewable Energy Sources) Regulations, 2020 and subsequent amendments thereof.

- 15.A.6. The maximum Renewable Energy generating system capacity to be installed at consumer premises under Group net metering arrangement shall also be subject to the cumulative capacity of the relevant Distribution Transformer, which has already been utilized, as specified in these Regulations.

- 15.A.7. HT (11 kV and above) Consumers opting for Group net metering, may install and connect such permitted Renewable Energy generating system under these regulations at their LT Bus Bar System:

Provided that, in such cases, the Net Meter shall be installed on the HT side of the Consumer's Transformer.

15.A.8. An eligible Consumer under Group net metering may install or enhance the capacity of, or upgrade the Renewable Energy generating systems after following due procedure and intimating the concerned Distribution Licensee:

Provided that, the total capacity of such systems within the same premises shall not exceed the capacity limits specified in these Regulations.

15.A.9. The Eligible Consumer who proposes to install a Renewable Energy generating system under Group net metering arrangement shall follow the procedures of application as specified in Regulation 8 and shall apply in the application form (Annexure - A), which the Distribution Licensee shall notify on its website.

15.A.10. The Distribution Licensee and Eligible Consumer shall enter into a Connection Agreement for Group Net Metering arrangement or, Virtual Net Metering, after approval of connectivity of Renewable Energy generating system with the distribution network, but before the start of actual generation from the System as specified in Regulation 9. A model Virtual Net Metering Connection Agreement and Group Net Metering Connection Agreement is provided at Annexure B.

15.A.11. All Renewable Energy generating system and allied equipment installed under Virtual net metering arrangement and Group net metering arrangement will conform to the standards and requirements specified in Regulation 10.

15.A.12. All metering systems under Group net metering and Virtual net metering shall be as per the provision specified in Regulation 11.

15.A.13. In case of Group Net Metering, energy accounting and settlement shall be dealt with as under:

a) If the quantum of electricity exported by a consumer exceeds the quantum imported at the connection where Renewable Energy generating system is located during the Billing Period, the excess quantum shall be adjusted against the energy consumed in the monthly bill of service connection(s) in a sequence indicated in the priority list provided by the Consumer. The sequence of priority for adjustment shall be deemed to have begun with the service connection where the Solar Project is located.

b) The priority list for adjustment of the balance surplus energy against other electricity connection(s) may be revised by the participating consumer only once at the beginning of every financial year with an advance notice of two months;

c) If the adjusted excess quantum of electricity exceeds the quantum imported during the Billing Period of service connection(s) under Group Net Metering, the excess quantum shall be purchased by the Distribution Licensee as specified in Regulation 12.6.1 (a) with amendments thereof.

d) For Time of Day (ToD) Consumers: The quantum of electricity export in

any time block (e.g., peak hours, off-peak hours, etc.) shall be first compensated with the quantum of electricity imported in the similar time blocks in the same billing cycle of the Consumer where the Solar Project is located, and any excess energy injected shall be adjusted against the energy consumed in the monthly bill of service connection(s) in a sequence indicated in the priority list provided by the Consumer, as if the excess Energy Credits occurred during the off peak time block for Time of Day (ToD) Consumers. The order of settlement of such excess energy injected shall be from the lowest tariff to highest tariff ToD time block.

e) Where the service connection, where Renewable Energy generating system is located, is disconnected due to any reason under any law for the time being in force, the unadjusted units/remaining credits of that consumer shall be paid by the Distribution Licensee at the end of the financial year and shall be subjected to settlement of any pending dues of that service connection.

15.A.14. In case of Virtual Net Metering, the energy accounting and settlement shall be dealt with as under:

a) The energy generated from the Renewable Energy generating system shall be credited in the monthly electricity bill of each participating consumer(s) as per the ratio of procurement from Renewable Energy generating system indicated under the agreement/MoU entered on a stamp paper by the Consumer(s) and submitted to the Distribution Licensee;

b) The Consumer(s) shall have the option to change the share of credit of electricity from Renewable Energy generating system by submitting a fresh Agreement/MoU on a stamp paper only once at the beginning of the financial year with an advance notice of two months;

c) The commercial arrangement for setting up and operating Renewable Energy generating system under Virtual net Metering between the participating Consumer(s) will be mutually agreed and the Distribution Licensee will not have any role in such commercial arrangement.

For such consumer(s), if the adjusted excess quantum of electricity exceeds the quantum imported during the Billing Period for any participating Consumer under Virtual Net Metering, the excess quantum shall be purchased by the Distribution Licensee as specified in Regulation 12.6.1 (a) with amendments thereof.

d) For Time of Day (ToD) Consumer: The energy generated from the Renewable Energy generating system in any time block (e.g., peak hours, off-peak hours, etc.) shall be first compensated with the electricity Consumption in the similar time blocks in the same billing cycle of the participating consumer(s). Any surplus generation over consumption in any time block in a billing cycle shall be accounted as if the surplus generation/ Energy Credits occurred during the off-peak time block. The order of settlement of such excess energy injected shall

be from the lowest tariff to highest tariff ToD time block.

e) Where the service connection of any participating consumer(s) is disconnected due to any reason under any law for the time being in force, the unadjusted units/remaining credits of that consumer shall be paid by the Distribution Licensee at the end of the financial year and shall be subjected to settlement of any pending dues of the consumer(s);

15.A.15. The quantum of electricity generated from Renewable Energy generating system under Group Net Metering arrangement or Virtual Net Metering arrangement, shall be exempted from banking charges, wheeling charges, cross subsidy surcharge, and additional surcharge.

Provided that 50% of Cross Subsidy Surcharge and 50% Additional Surcharge be made applicable for Government Connections opting for Virtual Net Metering or Group Net Metering arrangement under RESCO mode only.

Provided that 100% wheeling charges at 11kV voltage level (till wheeling charges are determined at LT level) OR, respective voltage level of drawal (after determination of wheeling charges at LT level) for connections with sanctioned load upto 100 kW and at respective voltage level of drawal for connections with sanctioned load above 100 kW be made applicable for Government Connections opting for Virtual Net Metering or Group Net Metering arrangement on actual share of energy drawal by the consumer.

Provided that waiver of 75% of wheeling charges be made applicable for Virtual Net Metering or, Group Net Metering connections with capacity of 5% of BESS installed. For BESS beyond 5% of solar capacity will be eligible for extra exemption of additional 1% Wheeling charges on enhancement of each 1% capacity of storage system up to 30% capacity. For BESS beyond 30% of solar capacity, will be exempted from 100% Wheeling charges.

15.A.16 The CDM benefits arising from Renewable energy generation from the generating system shall be retained by Distribution Licensee. *Provided that, the entire CDM benefits obtained by the Distribution Licensee shall be fully passed on to the consumers through the ARR.*

15.A.17. The Commission may stipulate from time to time the 'Parallel Operation Charges' to be levied on the energy generated under Group Net Metering systems, which shall cover balancing, banking and wheeling cost after adjusting RPO benefits, avoided distribution losses and any other benefits accruing to the Distribution Licensee, based on the Petition filed by Distribution Licensee, supported by adequate justification.

Provided that, no Parallel Operation Charges shall be levied on Virtual net metering consumers:

Provided that levy of Parallel Operation Charges be exempted for Government connections.

15.A.18. In case of failure to meet the requirements under these Regulations, the Renewable Energy generating system or the Distribution Licensee, as the case may be, shall be liable to pay penalty as decided by the Commission from time to time."

Stakeholders' Comments/Suggestions:

18. The stakeholders have mainly submitted as follows:

18.1 The term 'eligible consumer' should be clarified with reference to 'society' and 'participating consumers'.

18.2 This provision of eligible consumer is unduly onerous and prejudicial to consumer rights, particularly in cases where the dispute has arisen due to actions or omissions on the part of the distribution licensee. Requiring consumers to deposit amounts that are subject to adjudication, without a final determination of liability, effectively penalises them in advance and may deter eligible consumers from opting into these progressive metering arrangements. Furthermore, this proviso enables the distribution licensee to recover dues on a provisional and unilateral basis, in contravention of established regulatory and legal principles governing dispute resolution and consumer protection. Such a mechanism does not exist under the current regulatory framework and may amount to an overreach of authority by the distribution licensee. In light of the above, they requested the Commission to direct the Petitioner to delete the said proviso and ensure that eligibility for Virtual or Group Net Metering is not contingent upon the resolution of unrelated disputes.

18.3 In this, the status of 'society' and 'partner consumers' with outstanding dues should be clarified separately. A clear reference should be made to the issuance of 'moratorium order' by the competent authority on full or partial recovery of such outstanding amount till settlement of the dues.

18.4 Group Net Metering' as well as 'virtual net metering' will be applicable to domestic category up to 10 kW sanctioned load /

contract demand and these provide for adjustment of exported renewable energy in more than one service connection located with the same distribution licensee's area of supply. Area of supply of each distribution licensee (viz. AVVNL, JVVNL and JdVVNL) is spread over large area having number of billing centres. Besides this each has distribution franchisee in their area of supply. Further each connection / consumer may not be having 10KW sanctioned load and with the limitation and diversity of energy consumption among consumers, for full utilization of RE generation, number of consumers / connections may be around twice of plant capacity in kW divided by 10. Adjustment of exported energy among large number of consumers may initially have problems which may cause consumer's dis-satisfaction. It would be appropriate that this provision may either be implemented in phases, say first in same city / town and with 3-4 months experience, in larger area around city/ town and then to entire area of supply of AVVNL/JdVVNL/JVVNL or it may be provided that adjustment of energy exported outside the same city/ town will normally be effected in next billing month.

18.5 It should specify the 'location and place of use of the renewable energy system.

18.6 To clarify whether VNM & GNM is applicable in the whole area of Discom or otherwise.

18.7 This should be allowed in whole of state, as cheaper land & high solar emission are available on one part of state, which is suitable for any solar developer to install plant at reasonable rates.

18.8 It should be allowed up to 200% of the sanctioned load/demand as per the current efficiency of the renewable energy.

18.9 Proposed reg 15.A.4 provides that eligible sanctioned load / contract demand of individual participating consumer / connection will not exceed 10 kW. As per RERC (Electricity Supply Code and

Connected Matters) Regulations, 2021, for domestic category consumers up to 50 kVA, only sanctioned load as determined vide reg.2.1 (23) read with is applicable. As such, words 'contract demand' needs to be deleted, where ever specified in the proposed regulation.

18.10 The Commission may direct the Petitioner to provide a detailed justification for this limitation, as it appears to be unduly restrictive and may not reflect the operational flexibility required for the successful implementation and scaling of such distributed renewable energy models.

18.11 Permitting installation of REGS beyond 100% of the cumulative Sanctioned Load/Contracted Demand of the participating consumers may be desirable and feasible, subject to the technical capacity of the distribution transformer or local grid infrastructure. Such flexibility would facilitate efficient system planning by RESCOs or utility-led aggregators, allowing for the inclusion of future prospective consumers who may opt into the virtual net metering arrangement post-installation of the REGS. The Commission may consider amending Regulation 15.A.4 to allow for the installation of REGS up to a higher threshold with such percentage as deemed technically and commercially viable by the Commission, taking into account the capacity of the associated distribution infrastructure. This would ensure that the regulatory framework supports long-term participation, avoids underutilization of generation assets, and enhances consumer access to distributed renewable energy.

18.12 Reg 15.4.5 provides that capacity of RE generating system to be installed shall be up to one MW under VNM or GNM arrangements. For co-located, RE and BESS power plant for the export of 1 MW, installed capacity will be much higher to provide charging of BESS. Similarly for co-located wind -solar hybrid power plant, for 1 MW export, installed capacity of wind +solar will be much high as there is

diversity in both generation. As such limit of 1 MW installed capacity will not be appropriate and this limit should apply to peak exported power. It would therefore be appropriate that words "capacity of generating system to be installed" may be replaced by "export of power from RE generating system to be installed (including solar-wind hybrid or co-located RE cum BESS generating system) "

18.13 The consumers with a sanctioned load above 10 kW up to at least 100 kW should be allowed to participate and VNM should not be restricted to only domestic consumers, but also be extended to small LT industrial and commercial consumers as well.

18.14 There is a cap on current plant capacity limits of 1 MW, for both Virtual Net Metering (VNM) and Group Net Metering (GNM) projects, which should be increased. This will ensure equitable access to green energy, allow wider participation, and accelerate the adoption of renewable energy across consumer categories.

18.15 In today's power consumption pattern, in each house/ flat, connected load is more than 10 KW due to Air conditioners, Gysers and other electrical equipment, even a small shop have this issue, As such cap of 10 KW be removed,

18.16 VNM eligibility be extended and allow VNM facility above 10 kW up to 100 kW to domestic as well as small industrial & Commercial consumers (as small industrial consumers also face the same issue of non-availability of roof). This will be great relief to SSI& small shops and small commercial establishments.

18.17 The concept of limiting Plant capacity to one 1 MW needs to be reviewed and either cap be removed or atleast increase to 5 MW, subject to technical feasibility, Cheaper solar power to this sector of society, will enhance good will and brand image of Discoms, besides other sues of less transmission infrastructure, less losses & shall help in zero emission targets set by GOI.

18.18 As per the Standard Operating Procedure (SOP) for Implementation of Virtual Net Metering and Group Net Metering Mechanism issued by MNRE dated February 23, 2023, there is no capping for individual consumers for Virtual/Group Net Metering. Rajasthan Integrated Clean Energy Policy, 2024 promotes Virtual Net Metering (VNM) and Group Net Metering (GNM) and does not provide capping for individual consumers for Group Net Metering. Moreover, as per Grid Interactive Distributed Renewable Energy Generating Systems (DREGS) Regulations, 2021 and subsequent amendments, the rooftop solar system's capacity under net metering must not exceed 100% of the consumer's sanctioned load or contract demand or 1 MW, whichever is lower. The same capping may be kept for Virtual Net Metering and Group Net Metering under these regulations and the individual capping may be removed.

18.19 Increase the Individual Cap per Consumption Point: The cap of 10 kW per connection should be revised to 20 kW to accommodate smaller consumption sites without compromising grid safety or reliability.

18.20 Clarify that the Cap Applies to actual Consumption, and not to Connected Load: The regulation should clearly state that the cap pertains to actual power consumption per site (10/20 kW), and not the sanctioned load or contract demand. This will ensure consumers with larger connected loads can still participate within defined limits.

18.21 Remove Installation Cap per Site: Given that the consumption per site is already capped, a separate restriction on installed capacity per site should be removed, thereby maximizing the use of available rooftop spaces without requiring additional land.

18.22 The cumulative capacity of the relevant distribution transformer used must be specified.

- 18.23 For H.T. (11kV & above) connection please clarify the billing arrangement when the consumer connects 'Renewable Energy Generation System' to 'LT Bus Bar System'.
- 18.24 Reg.15.A.7- for 10 kW connected load there is no possibility of having 11 kV supply. Reg. 15.A.7 appears to be for number of group consumers of a multi-storage building or housing society which is supplied power at HT /11 kV but their individual consumers are metered and billed at LT. This reg. is required to be appropriately amended.
- 18.25 They should be freed from the formalities of depositing application fee, meter testing fee and contract etc. along with the facility of applying 'online' as per the current system. The corporation should have smart meters.
- 18.26 The Petitioner has proposed a compensation and adjustment mechanism for consumers under the Time-of-Day (ToD) tariff structure in the context of Virtual and Group Net Metering arrangements, as detailed under Regulations 15.A.13 (d) and 15.A.14 (d). Regulation 15.A.1 currently limits eligibility for these metering arrangements to domestic consumers, who, under the existing tariff structure in Rajasthan, are not presently subject to ToD tariffs.
- 18.27 In this context, we commend the Petitioner for incorporating provisions that are forward looking, and that anticipate a potential future scenario in which ToD tariffs may be extended to domestic consumers. However, in the interest of regulatory clarity and to avoid potential confusion in the interpretation or application of the proposed regulations, a clarificatory note or proviso may be inserted in Regulations 15.A.13 (d) and 15.A.14 (d) to state:

"These provisions shall become applicable upon the introduction of Time-of-Day tariff structure for domestic consumers by the Commission."

Such a clarification would ensure consistency between eligibility and applicability criteria, while also preserving the intent of the Petitioner to future-proof the regulatory framework.

18.28 Regarding Regulations 15.A.13: A-C: In case of additional production and export, adjustment in consumption of additional exported units by participating consumers and crediting of additional exported units in the next month should be made clear.

18.29 Proposed para 15. A. 13.D. 'TOD' should be exempted from tariff subject to maximum limit of 10 kW per consumer,

18.30 Proposed para 15.A.13.5: If the connection is permanently disconnected, the outstanding dues and security deposit should be paid within the next two months.

18.31 Proposed para 15.A.14: This should also be amended as per the amendments made in regulation 15.A.13 above.

18.32 Proposed para Reg.15.A.14(d): This reg. require alterations for providing clarity as under:

- (i) The provision of “the quantum of energy export in any time block (e.g. peak hours, off peak hours, etc) shall be first compensated with the quantum of electricity imported in the similar time blocks in the same billing cycle of the Consumer where project is located” is apparently applicable at generating station having both import and export metering and excess energy after adjustment as specified in this reg will be considered as per next provision. This needs to be clearly specified.
- (ii) The provision of “any excess energy injected shall be adjusted against the energy consumed in the monthly bill of service connection(s) in a sequence indicated in the priority list provided by the consumer” is impliedly applicable for group net metering where “priority list” is to be supplied by the consumer. For virtual net metering it will be difficult to interpret. It would therefore be appropriate that separate provision may be specified for both.

- (iii) Provision “as if the excess energy credits occurred during the off peak hours’ time block for time of day (ToD) consumers” should be separate sentence clearly defining excess energy credits.
- (iv) One or more consumer, utilising RE power under virtual net metering or group net metering, may have smaller solar roof top system with net metering. Such case should also be covered.

18.33 In view of above, amended reg. is suggested as under (deletions by strike out and additions in bold):

“The quantum of energy ~~export~~ **injection at RE generating station** in any time block (e.g. peak hours, off peak hours , etc) shall be first compensated with the quantum of electricity imported **at RE generating station** in the ~~similar~~ **corresponding** time blocks in the same billing cycle of the Consumer(s) where ~~project~~ **RE generating station** is located and any excess energy injected **in any time block** shall be adjusted against the energy ~~consumed~~ **drawal from distribution licensees during corresponding time blocks** in the monthly bill of service connection(s) as under:

- (a) **For group net metering**, in a sequence indicated for the same consumer in the priority list provided by the consumer, **and**
- (b) **For virtual net metering, percentage as specified for each participating consumer, shall be applied to such excess energy injection and adjusted against the energy drawl of that consumer from distribution licensee.**

Unadjusted energy during various time blocks shall be summed and shall be considered as if the excess energy credits deemed to have occurred during the off peak hours time block for time of day (ToD) consumers. The order of settlement of such excess energy ~~injection~~ credits shall be from the lowest tariff to highest tariff ToD block. The order of settlement for group net metering shall be as per priority list and for virtual net metering excess energy credits shall be worked out for each consumer and the order of settlement for that consumer shall be from the lowest tariff to highest tariff ToD block. Consumer at RE generating station shall be considered in such adjustments.

Note: In case one or more consumer, utilising RE power under virtual net metering or group net metering, have smaller solar roof top system installed at their premises under net metering, then exported energy metered for such consumers shall be added to excess energy credit to that consumer for virtual net metering and to total excess energy for group net metering”.

18.34 Surplus units be banked and carried forward to subsequent billing cycles, with annual settlement. At year-end, unutilized surplus

may be compensated at pooled power purchase cost or a defined tariff.

18.35 The energy accounting and billing may be explained by giving examples, so as to have clarity (particularly relating to system losses).

18.36 Regulation 15.A.15 proposed by the Petitioner lays down that the quantum of energy generated from the REGS under the virtual net metering and group net metering shall be exempted from banking charges, wheeling charges, cross subsidy surcharge and additional surcharge. Contrary to this provision, Regulation 15.A.17 proposes that the consumers opting for group net metering will be charged 'Parallel Operation Charges' which shall cover banking and wheeling costs after adjusting any benefits accrued by the distribution licensee due to Renewable Purchase Obligations, avoided distribution losses and any other benefits.

18.37 Reg.15.A.16 :- This regulation provides that CDM benefits from RE generation shall be retained by distribution licensee. As far as known, carbon credits are issued to the generator and as such CDM benefits will accrue to generator, provided it applies for it and sales CDM credit through exchange. Thus word 'retained' in this regulation may not be appropriate and may be replaced by 'shared' as provided in Reg. 39 of RERC tariff reg. 2025 and sharing may be on the lines of that regulations as two regulations of the Commission should not differ.

18.38 The draft should explicitly provide a mechanism for allocation and adjustment of electricity credits where a solar plant is set up by an Association of Persons (AOP) or Cooperative Society. Generation should be apportioned among members in proportion to their declared shareholding/participation ratio. The apportioned units should be directly adjusted in each member's individual DISCOM bill, in the same manner as rooftop solar credits. This will ensure

smooth implementation of community solar models and avoid billing ambiguity.

18.39 VNM projects, particularly those set up under an Association of Persons (AOP) or Cooperative Society model, be permitted to be established anywhere in the State, including connectivity at the RVPN network level. This flexibility is critical for pooling consumers across Rajasthan and for ensuring reliable power injection.

18.40 The final regulations may explicitly provide exemption from transmission charges, transmission losses, and wheeling losses, in addition to the exemptions already included.

18.41 Allowing AOP/Cooperative VNM projects in solar parks will ensure speed, cost-effectiveness, and reliability.

18.42 It is suggested that Govt. connections eligible for VNM or GNM needs to be elaborated and Public street lighting should also be included.

18.43 The proposed provision of levy of 100% wheeling charges on connection up to 100 kW and connection above 100 kW does not have clear distinctions between them as 'respective voltage level' is proposed for both. JVVNL may review to indicate clear distinction between them. Further wheeling charges presently being considered for open access are based on injection at EHV grid and draws at 132kV, 33 kV or 11 kV and is as per the methodology of RERC order dated 19.09.2006 that is:

(i) For 33 kV level: wheeling charges = (i) wheeling charges for EHV + (ii) wheeling charges of 33 kV lines; and

(ii) for 11 kV level : wheeling charges = (i) wheeling charges for EHV + (ii) wheeling charges of 33 kV lines + (iii) wheeling charges for 33/11 kV transformers and 11 kV lines.

18.44 For VNM or GNM with capacity up to 50 kVA energy injection in all likelihood would be at LT and for capacity above 50 kVA and up

to 1 MW capacity, injection in all likelihood would be at 11 kV (in considerations to 'applicable supply voltage' specified vide reg 4.1 of RERC Supply Code Regulations 2021). Thus logically, wheeling charges up to 50 kVA capacity of VNM or GNM will be wheeling charges of LT lines only and that for higher capacity will be wheeling charges of 11 kV lines + 11/0.4 kV transformers + LT lines. Thus wheeling charges for 11 kV injection should be higher than that for LT injection. To consider the same wheeling charges for both, as proposed, will not be logically correct. Wheeling charges determined by RERC vide commission's order dated 26/07/2024 for retail tariff for FY24-25 are Rs.0.01 paisa for 132 kV and above level, Rs.0.13 per kWh for 33 kV level and Rs.0.74 per kWh for 11 kV level. As brought out above, wheeling charges for 11 kV level includes that of higher voltage level and for 11 kV lines only it will be less than $Rs.0.74 - 0.13 = Rs. 0.61$ per kwh. Wheeling charges for all levels were determined in the Commission's order dated 19.9.06 and were Rs 0.11 per kwh for 33 KV system alone, Rs 0.22 per kwh for 11 kv system alone and Rs 0.52 per kwh for LT system alone. Now network has been augmented considerable with higher capital cost (due to inflation) and for LT system alone wheeling charges will be much higher than that for 11 kV system alone (i.e. Rs.0.61 per kWh), yet it would be appropriate that above difference of wheeling charges as per voltage of injection should be visible to public and wheeling charges for injection at HT and drawal at LT (HT-LT) open access may be as proposed (i.e. Rs.0.74 per kWh) and that for LT-LT open access may be say 80% of that at 11 kV level (i.e. Rs.0.60 per kWh).

18.45 For LT-LT open access wheeling losses may be considered (with rounding off) as 7.1% and that of HT (11kV)-LT, wheeling losses may be considered 10.9% (=rounding off of 7.09%+3.77%).

It would be appropriate that JVVNL indicate mandatory 1 hour rating i.e. 1.0 kWh/kW for BESS for the wheeling charges waiver of say 75% and for every 0.2 kWh/kW increase voluntarily provided by the consumer, waiver increase to be by 2.5% with maximum waiver of 25% and such waiver should be subject to charging of batteries (i.e. storage of energy) and discharging of batteries (that is energy retrieval) of RE generation satisfying conditions necessarily required to facilitate grid operation.

18.46 It would also be appropriate that ceiling limit of sanctioned load or 10 kW is increased to such extent that additional capacity is capable of generating energy storage requirement at normative CUF(i.e increased by $100 \times (\text{hrs. of storage} / 5)$ in %).

18.47 The accounting & billing system for all types of consumers availing solar energy from developer as Society/ AOP or any other mode; be clearly defined by the commission and no ambiguity be left.

18.48 On part of society/Association of Persons (AOP) be allowed, to restrict disputes in billing, Extra generated energy benefit be transferred to consumers as per regulations.

18.49 As per the Standard Operating Procedure (SOP) for Implementation of Virtual Net Metering and Group Net Metering Mechanism issued by MNRE dated February 23, 2023, VNM and GNM are not restricted to the domestic consumer category. Rajasthan Integrated Clean Energy Policy, 2024 promotes Virtual Net Metering (VNM) and Group Net Metering (GNM) and does not restrict it to the domestic consumer category.

6.3 To enable more access of solar power, Virtual Net Metering and Group Net Metering schemes will be promoted in the State to allow access to renewable energy to all consumers not having sufficient space in their premises.

Hence, Virtual Net Metering & Group Net Metering should not be restricted only up to the Domestic Consumer & Govt. consumers.

The coverage of VNM and GNM may be enhanced in the petition to cover other consumer categories. Notably, other SERCs like Delhi Electricity Regulatory Commission (DERC) and Assam Electricity Regulatory Commission (AERC) have also notified regulations to enable VNM and GNM and included other consumer categories apart from domestic category.

18.50 As per the Standard Operating Procedure (SOP) for Implementation of Virtual Net Metering and Group Net Metering Mechanism issued by MNRE dated February 23, 2023, there are no additional charges to be levied on consumers availing GNM and VNM.

As per Rajasthan Integrated Clean Energy Policy, 2024, Open Access charges are not applicable to consumers of VNM and GNM.

Also, as per minutes of the 91st meeting of the Forum of Regulators (FOR) dated 8th June 2024, the following Open Access charges are suggested to be applicable to consumers availing VNM and GNM:

Sl.No.	Mechanism	Location of RE Plant	Applicability of OA Charge
1	Virtual Net metering	Connected at the same feeder/DTL/sub-stations as the consumers	Nil (For all consumer categories)
2	Group net metering	Connected at the same feeder/DTL/sub-stations as the service connections	Nil (For all consumer categories)

As can be seen from the above, no Open Access charges are applicable on consumers connected at the same feeder/DTL/sub-stations. The same provision may be included in this petition.

18.51 As per Rajasthan Integrated Clean Energy Policy, 2024

6.5. Government Buildings will be solarized through installation of Solar Rooftop Plants

Hence, Government consumers with pending arrears with the Distribution Licensee should not be restricted to avail Group Net

Metering and Virtual Net Metering arrangement under these Regulations by the Distribution Licensee.

The provisions for recovery of payments from Discom's consumers are already existing for all categories electricity consumers irrespective of the fact that solar plant installed or not.

Additional Points:

18.52 Time Line: appropriate time lines for the activities and clearances required for Virtual Net Metering (VNM) and Group Net Metering (GNM) from Discoms or other relevant agencies should be prescribed.

18.53 Expand applicability to Non-Domestic Consumers: Extend VNM and GNM arrangements to include non-domestic consumers such as telecom towers, EV charging stations, and other C&I entities with distributed consumption patterns.

18.54 15.A.1(b): Here the words "Government Undertakings" should also be added along with "Government".

18.55 15.A.4.(ii): In order to speed up installation of solar power plants on government buildings through Rajasthan Renewable Energy Corporation, these connections should also be exempted from the requirement of 'technical feasibility'.

18.56 15.A.4. (ii): Since there are electricity connections in government buildings and to keep their billing process simple, the proposal to levy 50% 'cross subsidy surcharge', 50% additional surcharge and 100% 'wheeling charge' proposed now (under 15.2) is not appropriate.

18.57 15.A.4 (vi): At present, these Government buildings should also be kept free from Wheeling Losses like other States such as Delhi, Maharashtra, Jharkhand etc., so that this national work can be speeded up and these surcharges do not become an obstacle in it.

- 18.58 The remaining units (Kwh) of excess electricity (when export is more than import) should be carried forward to the next billing period (till the end of the financial year), as per the orders issued by the Electricity Regulatory Commissions of states like Maharashtra, Madhya Pradesh and Jharkhand in this regard in the year 2024 .
- 18.59 Additional submissions of Discoms are mostly related to solarisation of Govt connections. Thus the same has to be considered as per Gol office Memorandum dated 3.07.2024.
- 18.60 Discoms have to clarify in details as to for what reasons capping of 10 kW has been suggested in respect of Domestic connections/ consumers and no capping is being suggested in respect of Govt connections. Proper justification is specified for both suggestions.
- 18.61 A proviso has been suggested in 15.A.2 such consumers/connections may be eligible provided they deposit full disputed amount in the Distribution licensee.
- 18.62 In the definition of "Eligible Consumer" the words "or Participating consumer" shall be added.
- 18.63 Clarify regarding CFA so that participating consumers may not remain in any misunderstanding.
- 18.64 "Group Net Metering" and "Virtual Net Metering" may also be defined, as these definitions are not available in the present Regulations.

Discom's reply:

19. The Discoms have mainly submitted as follows:

- 19.1 The petitioner has already defined "Eligible Consumer" or "Participating Consumers" without restricting any particular class while specifying the categories of consumers like Societies, RWAS/GWAS etc. under the household category. Further, as per

clause 15A, the petitioner has already provided visibility wherein all eligible/participating consumers fulfilling the criteria are allowed to participate under the VNM or GNM regime. Therefore, Commission should not specify any separate category/sub-category wise eligibility provision under the proposed Regulation.

19.2 Clause 15.A.2 regarding pending arrears with Discoms not to be eligible for Net Metering arrangement, in this regard the objective of the Discoms are not only to reduce financial burden, but also to safeguard or protect the rights of the multiple consumers participating under the Virtual Net Metering and Group Net Metering Mechanisms. No such exclusion or deletion of the existing provision is required. Additionally, provisions are already available under RERC DREGS Regulations, 2021 wherein in case of any dispute in billing, it would be settled by the Consumer Grievance Redressal Forum and if issue still remains unresolved, the consumer may approach the Ombudsman. Therefore, Commission may consider the existing provisions under the proposed regulation.

19.3 Discoms clarified that installations installed under metering mechanisms like Group Net Metering and Virtual Net Metering shall also be eligible for CFA, if the metering arrangement is approved by the DISCOM, therefore, Commission may consider specifying any specified location (like rooftop/balcony or above elevated structures/land/water bodies) for use of RE sources under VNM and GNM mechanism.

19.4 No installation should be permitted or modified up to 200% of sanctioned load as per the current Regulations.

19.5 The inclusion of both sanctioned load and contract demand is intentional to accommodate all consumer categories, especially HT/industrial consumers. The Commission may decide the final approach.

19.6 Discoms are responsible to abide by existing regulations for ensuring local grid stability. Commission may not allow or amend any installation of REGS up to a higher threshold with such percentage as deemed technically and commercial viable.

19.7 The 1 MW cap aligns with existing regulations and reflects standard practice based on rated generation capacity (in kW/MW). Issues like BESS or MUs are beyond the current scope and may be addressed separately. Commission should not accept any replacement of words 'capacity of generating system to be installed' with 'export of power from RE generating system to be installed (including solar-wind hybrid or co-located RE cum BESS generating system' under the proposed regulation

19.8 Regarding capping, as per RERC (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021, it states that:

"7 Eligible Consumer and Individual Project Capacity"

7.2 The maximum Renewable Energy generating system capacity to be installed at any Eligible Consumer's premises shall not exceed 100% of the Sanctioned Load/Contract Demand of the consumer.

Further, as per RERC (Grid Interactive Distributed Renewable Energy Generating Systems) (First Amendment) Regulations, 2023, it is stated as:

"6.1 The cumulative capacity of Renewable Energy generating system to be allowed at a particular distribution transformer shall not exceed 80% of the capacity of such distribution transformer or such limit as may be stipulated by the Commission from time to time:"

Furthermore, as per RERC (Grid Interactive Distributed Renewable Energy Generating Systems) (Second Amendment) Regulations, 2024, it is stated as:

"(1) The existing sub regulation 8.8 shall be substituted with the following:

"For installation of Renewable Energy Generating systems, the technical feasibility study shall be completed within a period of fifteen days and the outcome of the study shall be intimated to the applicant, failing which it shall be presumed that the proposal is technically feasible.

Provided that the applications for Renewable Energy Generating systems upto 10 kW capacity complete in all respects shall be deemed to have been accepted without requiring technical feasibility study and any commensurate enhancement of the sanctioned load of the consumer, as may be required, shall be carried out by the Distribution Licensee. "

In view of the above and considering the fact wherein Discoms are responsible to abide existing regulation for ensuring grid stability at local level, the Petitioner has included the clause 15.A.4 under the proposed regulation. Additionally, capping on 10 kW on the eligible sanctioned load / contract demand of the individual participating consumers / connections is included with the objective to promote the VNM & GNM as per existing prevailing norms, thereby ensuring reduction in turnaround time for Rajasthan. Therefore, Commission may not allow or amend any installation of REGS up to a higher threshold as the consumers are always allowed to enhance their existing sanction load / contract demand through respective Discoms for fulfilling any additional demand requirement.

19.9 Considering other categories of consumers under the VNM & GNM, Discoms have aligned the provisions under the Utility Led Aggregation (ULA) model, as notified under the Operational Guidelines of the PM-Surya Ghar : Muft Bijli Yojana dated 28.12.2024. Furthermore, the petitioner has proposed the introduction of VNM & GNM for the domestic and government connections only.

19.10 The MNRE SOP dated 23 Feb 2023 and Rajasthan Integrated Clean Energy Policy, 2024 do not specify capping for individual consumers under GNM/VNM, the same rests with the Discoms considering the facts of Grid Stability and financial viability.

- 19.11 Regarding the limitation up to 1 MW under VNM & GNM , the same is in accordance with the RERC (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021. Also, considering the fact wherein Discoms are responsible to abide existing regulation for ensuring grid stability at local level, the petitioner has proposed the said limitation.
- 19.12 Commission should not include any separate provision relating to setting up of renewable energy generation system having capacity of more than one megawatt to remove any ambiguity.
- 19.13 Commission should not include any separate or repetitive provisions relating to the utilisation of cumulative capacity of the concerned distribution transformer.
- 19.14 Commission should not include any separate provision for network connectivity such as LT Bus Bar/HT/11 kV and above.
- 19.15 Proposed Reg 15.A.7 may not be amended because HT (11 kV and above) consumers opting for GNM for all the HT domestic category of consumers having multiple connections (such as hostels /institutions/charitable institutional /government run schools /recognized and registered Gaushalas, farm houses etc.) within the area of supply of Distribution Licensee.
- 19.16 To enable any ecosystem for online transactions, Discoms are already using portals like 'Unified Web Portal' and 'PM Surya Ghar National Portal'. However, in case of any additional requirements, Discoms may consider designing and development of any additional portals in future or incorporating any IT features in the already developed portals. Installation of 'Smart Meters' on residential consumers is already in progress in Rajasthan Discoms, with high priority being given to Government and Industrial consumers under Revamped Distribution Sector Scheme (RDSS).

19.17 The Petitioner proposed the clause 15.A.13 (d) and 15.A.14 (d) under the existing proposed regulation. Additionally, the Petitioner acknowledges the suggested proviso of the stakeholder and re-produced with improvised version for acceptance cum addition by the Commission after both clauses [15.A.13 (d) and 15.A.14 (d)] of the proposed regulation.

"Provided that these provisions shall become applicable upon the introduction of Time-of-Day Tariff structure for all consumers (except agriculture) having maximum demand more than ten Kilowatt (10 kW and with smart meters installed, shall be brought under the TOD Tariff structure. "

19.18 Based on the directions of Ministry of Power, the petitioner has already proposed the introduction of ToD tariff for all consumers (excluding agriculture) having load above 10 kW falling under its jurisdiction before Commission through a petition for approval of Total Revenue Requirement, Tariff and Investment Plan for FY 2025-26. It is also submitted that the petitioner is making all possible efforts to install smart meters at the premises of its consumers and all consumers will be provided with smart meters in the near future. It is proposed that all such consumers having load above 10 kW (excluding agriculture) and having smart meters shall be brought under ToD tariff structure.

19.19 If deemed appropriate, the Commission may insert the below provisions after both the clauses (15.A.13 (d) and 15.A.14 (d)) of the proposed regulation.

"Provided that these provisions shall apply on introduction of Time-of-Day tariff structure to all consumers (other than agriculture) having peak demand exceeding ten kW (10 kW) and having Smart Meters installed, shall be brought under TOD tariff structure."

19.20 15.A.13 (e): The petitioner acknowledges the suggestion by the stakeholders to pay any outstanding dues and security deposits (in case of any disconnection of renewable energy system) within the next two months, however the petitioner has not made any such

provision. As per clause number 15.A.13 (e) and 15.A.14 (e) it is provided that the unadjusted unit/balance credit of the consumers will be paid by the Distribution Licensee at the end of the financial year which will be included in the settlement of any pending dues of the consumer(s).

19.21 Recommendation of the stakeholder with some replacement cum addition of words and provisions under the Time-of-Day settlement Mechanisms. Therefore, the petitioner is hereby re-submitting the amended provisions under the GNM & VNM which may be considered by Commission:

"15.A.13 (d)

For Time of Day (TOD) Consumers: The quantum of electricity injection at renewable energy generating systems in any time block (e.g., peak hours, off-peak hours, etc.) shall be first compensated with the quantum of electricity imported at renewable energy generating systems in the corresponding time blocks in the same billing cycle of the Consumer where renewable energy generating system is located, and any excess energy injected in any time block shall be adjusted against the energy drawal in the monthly bill of service connection(s) in a sequence indicated in the priority list provided by the Consumer, as if the excess Energy Credits occurred during the off peak time block for Time of Day (TOD) Consumers. The order of settlement of such excess energy injected shall be from the lowest tariff to highest tariff ToD time block."

"15.A.14 (d)

For Time of Day (ToD) Consumers: The quantum of energy generated at the renewable energy generating systems in any time block (e.g., peak hours, off-peak hours, etc.) shall be first compensated with the quantum of electricity drawal in the corresponding time blocks in the same billing cycle of the Participating Consumer, as a ratio specified for each of the participating consumers. Any surplus generation over drawal in any time block in a billing cycle shall be accounted as if the surplus generation /energy credits occurred during the off-peak time block for Time of Day (ToD) Consumers. The order of settlement of such excess energy injected shall be from the lowest tariff to highest tariff ToD time block."

19.22 Treatment of Surplus Electricity:

The energy accounting and settlement related provisions under the VNM & GNM is already been presented under the submissions. Further, as per RERC DREGS Regulations, 2021, the

eligible consumer are allowed to install renewable energy generating system with or without storage.

19.23 The petitioner submits that the energy accounting and settlement related provisions under the VNM & GNM has already been presented under the submissions. Since, the VNM & GNM is at the introductory phase, any specific energy accounting, billing related Standard Operation Procedures (SOP), loss computations related examples, other modalities to remove difficulties etc. may be issued by respective Discoms from time to time and upon notification of the proposed regulation / amendments by Hon'ble RERC.

19.24 Parallel operation charges are a service which is provided to the system of generators and also the system causes voltage drop, harmonics injection, frequency, requirement of additional reactive power etc. to the power system. By parallel operation, the generators always gain (more' or less), and hence they are liable to pay these charges for the services. In real-time operation of the grid, generators are responsible for load balancing. In case of sudden spikes in load, the discom has witnessed variations in system frequency and voltage and hence, it becomes unaccounted. However, grid assistance is an ancillary service provided by the utility to the consumers, hence 'parallel operation charges' should be recovered from the consumers who use grid assistance. In view of the above, it is submitted that since 'Net Meter Systems' or 'Group Net Metering' requires real time grid assistance, the proposed provision i.e. mentioned in clause no. 15.A.15 and 15.A.17 is not applicable. Therefore, Commission may take an observation for any inclusion or exclusion of applicable POC under the proposed regulation.

19.25 Petitioner has not proposed any mechanism under which if penalty and security amount is not paid within two months, interest at bank

deposit rates would be paid by the renewable energy system or Distribution Licensee as the case may be. Therefore, if deemed fit, the Commission may consider amending the proposed provision from 'no interest' to 'interest at bank rates' (preferably SBI rates).

19.26 As per clause no. 15.A.16 regarding CDM benefits in the proposed regulation, thereby ultimately ensuring benefit to consumers / beneficiaries through the ARR. Therefore, Commission may not execute any amendments under the proposed regulation.

19.27 Mechanism for Adjustment of Electricity in Case of AOP/Cooperative Society:

The proposed amendments to the RERC DREGS Regulations, 2021, already incorporate mechanisms to facilitate credit allocation under both Virtual Net Metering (VNM) and Group Net Metering (GNM) frameworks. Accordingly, the petitioner has included the draft connection agreement under the Virtual Net Metering. Therefore, Commission may not include any additional provisions for the energy settlement mechanism. In case any refining is required under the proposed amendment, the commission may take a view in order to ensure clarity and enhancing operational efficiency.

19.28 Restriction of Project Location within Same DISCOM:

The petitioner highlights that the intention behind the VNM & GNM Mechanism is only to ensure maximum coverage, scale-up of rooftop solar among individual consumers / RWAs / Group Housing Societies within the same distribution licensee areas and maximum up to 1 MW of solar PV capacity.

Apart from this, since Rajasthan Discoms (JVVNL / AVVNL / JdVVNL) and Distribution Franchisee (DFs') have their separate area of electricity supply with no such provision of unified billing system, any implementation of VNM & GNM shall be governed /

executed separately. Additionally, the maximum 1 MW capacity shall be connected at Discom's voltage level (33/11 kV or LT) only. In view of the above, Commission may not allow any inclusion of connectivity at the RVPN network levels with settlements at SLDC in order to maintain efficient operations within the purview of respective Discoms.

19.29 Exemption from Transmission Charges and Transmission / Wheeling Losses:

The provision to exempt any transmission charges and transmission losses are not under the ambit of the proposed petition as the VNM & GNM is already capped at 1 MW solar PV capacity which is under the purview of the respective Discoms.

Further, the applicability of any wheeling charges and wheeling losses are essential for maintaining grid reliability, and recovering the costs incurred by utilities in erecting and maintaining the network infrastructure. To recover legitimate cost and strike a balance between affordability and grid sustainability, the petitioner has considered the provisions related with wheeling charges and wheeling losses (in terms of approved distribution losses for the year at LT level), till losses at LT levels are approved by the commission.

19.30 Fast-Track Implementation via Solar Parks:

The RERC (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 primarily govern distributed renewable energy systems with the permissible limit of 1 MW/ solar PV capacity and with the objective to install centralized power plants generating systems at or near the point of use, rather than from large, centralized power plants.

19.31 The petitioner submits the following to clarify the comments of the stakeholder as below:

- i Since, the wheeling charges are not defined for LT voltage levels, 100% wheeling charges at similar charges to that of 11 kV be made applicable for GNM/VNM Connections with Sanctioned Load/Contract Demand up to 100 kW, till the wheeling charges are defined for respective voltage level of the Connection.
- ii Regarding Connections with sanction load above 100 kW, the petitioner would like to draw the attention of the stakeholder to The RERC (Terms and Conditions for Green Energy Open Access) Regulations, 2025 wherein any person who has contract demand or sanctioned load of 100 kW or more, either through single connection or through multiple connections aggregating one hundred (100) kW or more located in same electricity division of a distribution licensee qualifies for open access provided he is supplied with the electricity from green energy sources. For such Connections, the metering point as well as the interconnection point for grid connectivity shall be the nearest transmission / distribution licensee sub-station. This entails the voltage level of 11 kV & above. Hence, the petitioner has submitted for applicability of wheeling charges at respective voltage level.

19.32 Since, the wheeling charges have not been determined for LT, the petitioner has proposed to levy the 100% of the wheeling charges at 11 kV voltage level, till wheeling charges are determined at LT level. Therefore, Commission may take a prudent view for finalization of wheeling charges applicable at the specified voltage level.

19.33 The stakeholder would acknowledge the fact that the participating consumers would wheel the electricity on Discoms' network making it compulsory to adjust the wheeling losses against the actual share

of energy wheeled. Further, the petitioner submits that the applicable wheeling losses have been proposed as per the approved distribution losses. Such approved distribution losses are proposed to be applicable till the wheeling losses at LT level are approved by the Commission. Therefore, Commission may take a prudent view for finalization of wheeling losses applicable at the specified voltage level.

19.34 The petitioner would like to clarify that para 3 (v) of their petition proposes the incremental waiver of wheeling charges with corresponding increment in BESS capacity to be installed along with VNM/GNM installations with respect to Sanction Load/Contract Demand vis-à-vis solar capacity (in terms of %), which is aligned with the existing RERC (Terms and Conditions for Green Energy Open Access) Regulations, 2025. Further, the petitioner has proposed the same considering the fact that any power generating stations are rated based on their maximum power output (kW or MW or GW) rather than the instantaneous maximum usable power (MUs / kWh) or additional power required to provide charging of BESS because kW/MW/GW represents the maximum amount of electricity a plant can generate under specific, standardized conditions. Also, this standardized rating allows for easier comparison between different plants and is used by utilities to project how much electricity a generator can handle.

19.35 Additionally, in CEA's advisory and state policy, it's mentioned that:

"5. Distribution Licensee may also consider mandating 2 – hour storage with roof top solar plants as well."

The petitioner's proposal in the instant petition to waive off the wheeling charges remains in line with the aim of promoting BESS as well as keeping it consumer centric. Therefore, Hon'ble RERC may take a prudent view upon this.

In this regard, it is submitted that the petitioner has considered the provisions of waiver of wheeling charges for GNM connections with capacity % BESS installed in line and modifications with the existing RERC (Terms and Conditions for Green Energy Open Access) Regulations, 2025 wherein its mentioned as:

"11.3 For the use of both EHV and the distribution network, both transmission and wheeling charges as well as losses as applicable shall be payable.

....

(i) RE Integrated Storage project with a capacity of 5% of RE capacity will be eligible for exemption of 75% on Transmission and Wheeling charges for a period of seven (7) years. For BESS beyond 5% of RE capacity will be eligible for extra exemption of additional 1% Transmission and Wheeling charges on enhancement of each 1% capacity of storage system up to 30% capacity. For BESS beyond 30% of RE capacity, will be exempted from 100% Transmission & Wheeling charges."

19.36 Petitioner recommended to incorporate the said benefits as conditions of availing waiver in wheeling charges in detailed procedure to be notified by Discoms.

The petitioner is aligned with the said provisions and if deemed fit, Commission may direct the petitioner to notify provisions at Discom levels that are beneficial for the consumers from time to time.

19.37 In view of applicability of Time-of-Day (ToD) Tariff on domestic consumers, it is submitted that as per Ministry of Power (MoP) vide its notification dated 14th June 2023, as an amendment to the Electricity (Rights of Consumers) Rules, 2020, published the Electricity (Rights of Consumers) Amendment Rules, 2023 wherein Clause 8A was inserted via this amendment, mandated that Time of Day (ToD) tariff to be implemented for all consumers (except Agriculture) with connected load above 10 kW.

"(8A) Time of Day Tariff.-The Time of Day tariff for Commercial and Industrial consumers having maximum demand more than ten Kilowatt shall be made effective from a date not later than 1st April, 2024 and for other consumers except agricultural consumers, the Time of Day tariff shall be made effective not later than 1st April, 2025 and a Time of Day tariff shall be made effective immediately after installation of smart meters, for the consumers with smart meters...."

19.38 Based on MoP directives, the Petitioner vide petition for approval of aggregate revenue requirement, tariff and investment plan for FY 2025-26 has already proposed the introduction of ToD Tariff for all consumers (except Agriculture), with load above 10 kW under its jurisdiction before Commission. Also, it is submitted that the

Petitioner is under vigorously pushing for the installation of smart meters for its consumers and all consumers shall be installed with such smart meters in the near future. It is proposed that all such consumers with load above 10 kW (except Agriculture) and with smart meters installed, shall be brought under the ToD Tariff structure. Therefore, the Petitioner proposed the clause 15.A.13 (d) and 15.A.14 (d) under the proposed regulation. Hence, if deemed fit, the Petitioner request Hon'ble RERC to incorporate below provisions after both clauses 15.A.13 (d) and 15.A.14 (d)] of the proposed regulation.

"Provided that these provisions shall become applicable upon the introduction of Time-of-Day Tariff structure for all consumers (except agriculture) having maximum demand more than ten Kilowatt (10 kW) and with smart meters installed, shall be brought under the ToD Tariff structure."

19.39 The petitioner highlights that the intention behind the VNM & GNM Mechanism is only to ensure maximum coverage, scale-up of rooftop solar among individual consumers / RWAs / Group Housing Societies within the same distribution licensee areas and maximum up to 1 MW of solar PV capacity.

19.40 Further, as per RERC (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021, the eligible consumers are allowed to install renewable energy generating system with or without storage, and with the BESS, Discoms aim is to bank the surplus energy from the solar energy generated and utilize during the peak and/or night hours.

19.41 While MNRE SOP recommend inclusivity and the Rajasthan Integrated Clean Energy Policy, 2024, in para 6.3, "To enable more access of solar power, Virtual Net Metering and Group Net Metering schemes will be promoted in the State to allow access to renewable energy to all consumers not having sufficient space in

their premises.” does not mandate to cover all the categories immediately.

Further, rolling out VNM & GNM in phases, beginning with domestic and government connections, enables close monitoring and smoother operationalization, building technical and regulatory capacity before expanding coverage.

19.42 Further, considering the fact wherein Discoms are responsible to abide by existing regulation for ensuring grid stability at local level and with the objective to promote the VNM & GNM as per existing prevailing norms, thereby ensuring reduction in turnaround time for Rajasthan, limitations on the individual capacity of 10 kW under the VNM & GNM has been proposed.

19.43 Additionally, the proposed amendment is in line with the accelerated approach to solarize the household connections. MNRE in its guideline for PM-Surya Ghar: Muft Bijli Yojana, “as per the provisions of the Electricity (Rights of Consumers) Rules, 2020 and subsequent amendments, applications for rooftop solar systems up to 10 kW capacity shall be deemed to have been accepted without requiring approval of technical feasibility by the DISCOMs.”

19.44 The petitioner has already requested the Hon’ble RERC to permit the Discoms to, if required, separately request the commission for waiver for fees and other charges for which the commission may issue a separate order based on petitioners request or suo-motu basis.

19.45 Further, the petitioner has already included or incorporated exemption related provisions under the submitted petition, which may be considered by the Commission.

19.46 As regards recovery of arrears, the petitioner also submitted that the Rajasthan Discoms are abide with the provisions under RERC (Grid

Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 wherein it is stated as:

"4 General Principles

.....

4.2 Consumers having pending arrears with the Distribution Licensee shall not be eligible for Net Billing arrangement or Net Metering arrangement under these Regulations:

Provided that, where there is a dispute between the Distribution Licensee and the consumer, relating to any charge for electricity, such consumers shall be allowed Net Metering or Net Billing arrangement pending such resolution of such dispute upon deposit of the disputed amount with the Distribution Licensee in accordance with Section 56 of the Act.

- 19.47 On similar lines and considering the fact that Discoms are under financial stress due to unrecovered higher arrears, the Petitioner proposed the provision as mentioned under Clause 15.A.2. Here, the objective of the Discoms is not only to reduce financial burden, but also to safeguard or protect the rights of the multiple consumers participating under the VNM & GNM Mechanisms.
- 19.48 In view of the above, no such exclusion or deletion of the existing provision is required. Additionally, provisions are already available under RERC (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 wherein in case of any dispute in billing, it would be settled by the Consumer Grievance Redressal Forum and if issue still remains unresolved, the consumer may approach Ombudsman.
- 19.49 Once the proposed regulation is notified, the Petitioner may modify the annexures to the petition.
- 19.50 The timelines for the activities and clearances required shall be as per existing norms being followed in respective Discoms.
- 19.51 Discoms, through its additional submission, has proposed extending VNM & GNM to Government Connections, earlier it was proposed for Domestic category only.

19.52 Further, the petitioner acknowledge the concern raised by the stakeholder for extending applicability to non-domestic consumers. The petitioner understands that while MNRE SOP recommend inclusivity and the Rajasthan Integrated Clean Energy Policy, 2024, in para 6.3, *"To enable more access of solar power, Virtual Net Metering and Group Net Metering schemes will be promoted in the State to allow access to renewable energy to all consumers not having sufficient space in their premises."* does not mandate to cover all the categories immediately. Rolling out VNM & GNM in phases, beginning with domestic and government connections, enables close monitoring and smoother operationalization, building technical and regulatory capacity before expanding coverage.

19.53 Regarding considering other categories of consumers under the VNM & GNM, it is submitted that Discoms have aligned the : provisions under the Utility Led Aggregation (ULA) model, as notified under the Operational Guidelines of the PM-Surya Ghar Muft Bijli Yojana dated 28.12.2024.

19.54 Thus, a phased approach or category specific roll out can prevent risk from unforeseen revenue impacts and operational issues. Therefore, Commission may consider the submission made by the petitioner.

19.55 The petitioner has mentioned/ prayed for Government Connections' irrespective of any specific category of connection(s) or any separate provisions has been made for 'Government Undertaking'. Therefore, Commission may take a prudent view on the inclusion of any special categories under the Government Connections.

19.56 As per the provisions of the Electricity (Rights of Consumers) Rules, 2020 and subsequent amendments and the operational guidelines for PM-Surya Ghar : Muft Bijli Yojana dated 07.06.2024, applications for rooftop solar systems up to 10 kW capacity shall be deemed to have been accepted without requiring approval of technical

feasibility by the DISCOMs, which is applicable on the residential consumers.

19.57 Further, the petitioner understands that extending the exemption to government connections might be regulatory-consistent, however due to the involvement of the significant loads, and in view of critical services offered, exempting Government Connections from technical feasibility shall not be suitable. Technical feasibility shall help in identifying the critical and technical risks including grid stability, protection measures, overloading etc. at the Discom level.

19.58 The provision of 50% Cross Subsidy Surcharge and 50% Additional Surcharge on the Government Connection opting for VNM & GNM is aligned with the RERC DREGS Regulations, 2021.

19.59 Wheeling losses are accounted at the LT level for rooftop solar to recover the distribution utility's costs for the infrastructure and service provided to the consumer, especially when the solar energy is consumed through the same LT distribution network. In view of the above, the petitioner has proposed wheeling losses at the approved distribution losses for the year at the HT level, till wheeling losses at LT level is approved by the Commission.

19.60 Petitioner has considered the settlement mechanism as per the existing provisions under the RERC DREGS Regulations, 2021.

Commission's Analysis/decision:

20. The stakeholders contended that disqualifying consumers with pending arrears from availing Net Metering is onerous and prejudicial, particularly where disputes arise due to the distribution licensee's actions. They argued that such a provision amounts to penalising consumers in advance, is inconsistent with established principles of dispute resolution, and may deter participation in Group and Virtual Net Metering. It was further urged that Government buildings should not be restricted under

this provision, as the *Rajasthan Integrated Clean Energy Policy, 2024* specifically promotes solarisation of such premises.

21. The Discoms, however, submitted that the restriction under Clause 15.A.2 is necessary to protect both their financial health and the rights of other participating consumers, and that adequate remedies for billing disputes already exist under the RERC DREGS Regulations, 2021. They therefore argued that no amendment is warranted.
22. The Commission, after carefully considering the submissions, is of the view that the provision disqualifying consumers with arrears or disputed amounts is essential to safeguard the financial health of the Discoms. Such a restriction is consistent with the approach already adopted in the principal Regulations and is necessary to ensure financial discipline among consumers. At the same time, the Commission recognizes the unique circumstances associated with Government connections and Government premises such as schools, hospitals, offices, and public sector undertakings possess significant rooftop potential for solar adoption. In addition, Government buildings have already been identified as priority segments under national and state-level policy initiatives such as the solarization of Government buildings. In this context, imposing arrear-related restrictions without flexibility may create avoidable hurdles in achieving larger policy objectives of renewable energy promotion.
23. Accordingly, while retaining the general provision for disqualification of consumers with arrears or disputed amounts, the Commission clarifies that a specific exception shall be made available for Government connections. Such entities may be permitted conditional participation in *Group Net Metering (GNM)* and *Virtual Net Metering (VNM)* mechanisms, or even other schemes envisaged in the *Principal Regulations*, even in cases where arrears are pending. Notwithstanding the pendency of such arrears, *Government connections* may be allowed conditional

participation, subject to such arrangements and conditions as may be deemed fit by the *Distribution Licensees (Discoms)* under these Regulations. Accordingly, regulation 4 shall be amended as below:

The existing sub regulation 4.1 main provision shall be substituted with the following:

"4.1 The Distribution Licensee shall offer the provision of Net Billing arrangement, Net Metering arrangement, Group Net Metering or Virtual Net Metering to the Eligible Consumer, who intends to install Grid Interactive Distributed Renewable Energy generating system in its area of supply on nondiscriminatory and 'first come first serve' basis:"

The existing sub regulation 4.2 shall be substituted with the following:

"Consumers having pending arrears with the Distribution Licensee shall not be eligible for Net Billing arrangement, Net Metering arrangement, Group Net Metering or Virtual Net Metering under these Regulations:

Provided that, where there is a dispute between the Distribution Licensee and the consumer, relating to any charge for electricity, such consumers shall be allowed Net Metering, Net Billing, Group Net Metering arrangement and Virtual Net Metering arrangement, pending such resolution of such dispute upon deposit of the disputed amount with the Distribution Licensee in accordance with Section 56 of the Act.

Provided further that, notwithstanding the pendency of arrears, Government connections, may be permitted conditional participation, subject to such arrangements and conditions as may be deemed fit to the Discoms."

24. At the same time, the Commission is conscious of the need to protect the financial interests of the Discoms. **Therefore, the Commission advises the State Government to take appropriate steps to ensure that all pending arrears of Government consumers towards the Discoms are duly settled.** This measure would strike a balance between facilitating solar adoption

on Government premises and maintaining the financial discipline necessary for the sustainability of the distribution sector.

25. The stakeholders broadly submitted that several provisions relating to Virtual Net Metering (VNM) and Group Net Metering (GNM) require relaxation, clarification, or expansion to ensure wider consumer participation and effective implementation. They contended that limiting eligibility to domestic consumers with sanctioned load/contract demand up to 10 kW is unduly restrictive, as many households, small shops, and even government buildings have higher connected loads. They proposed extending eligibility to consumers up to 100 kW, including small LT industrial, commercial, telecom, EV charging, and other non-domestic consumers, in line with the Rajasthan Integrated Clean Energy Policy, 2024 and the MNRE SOP dated 23.02.2023, both of which envisage VNM and GNM for broader categories. Many stakeholders also argued that the cap of 1 MW on plant capacity should be reviewed and either removed or increased (e.g. to 5 MW), subject to technical feasibility, particularly for hybrid and co-located RE+BESS plants where installed capacity exceeds export capacity.
26. Further, stakeholders emphasized that the use of terms such as “contract demand” should be aligned with the RERC Supply Code Regulations, 2021, and that definitions of “Group Net Metering” and “Virtual Net Metering” be explicitly included for clarity. They also sought that surplus energy be permitted to be carried forward across billing cycles with annual settlement, and that accounting, billing, and allocation mechanisms for societies, AOPs, and cooperatives be clearly defined to avoid disputes. In addition, they requested clarity on adjustment of exported energy under ToD conditions, with separate provisions for GNM and VNM, and suggested that forward-looking clauses relating to ToD tariffs for domestic consumers should be made applicable only upon actual introduction of ToD for such consumers.

27. On charges, stakeholders submitted that wheeling, banking, cross-subsidy, and additional surcharges should be waived or rationalized, consistent with net metering and the provisions of the Rajasthan Integrated Clean Energy Policy, 2024 and the FOR recommendations. They argued that the proposed levy of 100% wheeling charges and parallel operation charges would undermine the attractiveness of VNM/GNM. Several also suggested that Government buildings, which are mandated to be solarized under State policy, should be exempt from such charges, losses, and feasibility restrictions to accelerate adoption. It was further suggested that street lighting and Government undertakings be explicitly included as eligible consumers.
28. Stakeholders also highlighted the need for clear timelines for approvals, online application systems, reduced procedural requirements, and use of smart meters to simplify implementation. They also sought clarification on CFA eligibility, adjustment of dues in cases of moratorium orders, treatment of consumers with pending arrears, and inclusion of additional flexibility such as allowing installations beyond 100% of sanctioned load subject to transformer/grid capacity. Overall, the submissions emphasized that the framework should be more enabling, future-ready, and consistent with national and state policies promoting distributed renewable energy.
29. The Distribution Licensees (Discoms) submitted that the petitioner has already provided an encompassing definition of "Eligible Consumer"/"Participating Consumer" and has allowed visibility for all consumers satisfying the prescribed criteria; consequently, the Commission need not create separate sub-categories by consumer class. The Discoms reiterate that the proposed framework is intended to promote rapid rollout of VNM/GNM while balancing operational and financial prudence, and therefore propose that the regulations proceed on the basis of the eligibility and processes presently set out in Clause 15A and its Annexures. Any further refinements, including modification of

annexures, may be carried out by the Discoms after notification of the Regulations.

30. On technical and capacity limits, the Discoms justify the individual consumer cap of 10 kW and the project cap of 1 MW as consistent with existing RERC DREGS Regulations and necessary to ensure local grid stability and manageable turnaround times; they oppose permitting installations up to 200% of sanctioned load and caution against replacing “capacity of generating system to be installed” with an export-based formulation that would subsume BESS and hybrid sizing issues beyond the current scope. The Discoms also stress that technical feasibility, transformer capacity limits, voltage-level distinctions, and appropriate wheeling charges/losses must be preserved to protect network reliability. Proposals on progressive waivers of wheeling charges linked to BESS capacity are acknowledged, and Discoms seek discretion to implement such incentives consistent with Commission's earlier orders and CEA/MoP guidance.
31. The Discoms also state that detailed modalities for energy accounting, ToD settlement, online applications, smart meter roll-out, timelines and other operational SOPs will be addressed at the Discom level (or through separate filings) once the Regulations are notified. They support insertion of a proviso making ToD-related clauses operative only upon formal introduction of ToD tariffs and smart meter coverage for the relevant consumer categories. The Discoms therefore requested that the Commission may take a prudent, phased approach preserving the present safeguards for grid safety and financial sustainability, while enabling the utility-level procedural clarifications and incentives necessary for effective implementation.
32. The Commission observes that the Distribution Licensees have submitted that certain detailed modalities pertaining to energy accounting, Time-of-Day (ToD) settlement, online application processes, roll-out of smart

meters, prescribed timelines, and other operational Standard Operating Procedures (SOPs) shall be appropriately developed and implemented at the level of the respective Discoms, or through separate petitions/filings before the Commission, subsequent to the notification of these Regulations. The Discoms have further suggested that a proviso may be incorporated to the effect that ToD-related provisions of the Regulations shall become operative only upon the formal introduction of ToD tariffs and adequate coverage of smart metering for the relevant consumer categories.

33. The Commission, having examined the submissions, is of the considered view that a prudent and phased approach is warranted in order to balance the objectives of enabling wider consumer participation while at the same time safeguarding grid stability and ensuring financial sustainability of the distribution system. The Commission notes that the enabling framework for ToD settlement is necessary; however, its operationalization must be aligned with the availability of enabling infrastructure such as smart meters as already noted in Tariff order dated 03.10.2025, the ToD will be made applicable to all consumers with load more than 10 KW, except Agriculture, having ToD enabled meter installed.
34. The Commission further observes that while the Discoms have proposed to restrict the applicability of Virtual Net Metering (VNM) and Group Net Metering (GNM) to domestic and government consumers in the initial phase, the Commission is of the view that such a restriction is neither consistent with the intent of the *Rajasthan Integrated Clean Energy Policy, 2024* nor aligned with the national goal of Net Zero by 2070. In Commission's view emphasis should be on wider consumer participation in distributed renewable energy mechanisms. Restricting VNM/GNM only to limited categories would unnecessarily constrain the growth of Distributed Energy Resources in the State.

35. The Commission also observes that allowing VNM/GNM across broader consumer categories will create a win-win framework. For the Discoms, distributed renewable energy reduce losses, and supports demand-side management, helps in meeting Renewable Purchase Obligations, and provides valuable assistance in managing peak demand. For consumers, it enables gainful utilization of rooftops and other available spaces, reduces dependence on grid supply, and allows access to clean and affordable electricity even for those who cannot individually install solar plants.
36. Accordingly, the Commission holds that the scope of VNM/GNM shall not be restricted to domestic and government consumers alone. Instead, it may be extended to all consumer categories, subject to technical feasibility and prudent safeguards, so as to promote equitable access to renewable energy, ensure optimal utilization of available infrastructure, and advance the State's clean energy transition.
- 36.1 The Commission is further of the view that the restriction of individual participating consumers under VNM/GNM to a maximum of 10 kW sanctioned load/contract demand would act as a barrier to the success of these schemes and limit wider participation. Such a cap may be suitable where only domestic households are permitted, but once VNM/GNM is extended to all categories of consumers, including industries, commercial establishments, institutions and other entities, the continuation of a 10 kW ceiling becomes impractical.
37. The Commission notes that several stakeholders have highlighted that in today's scenario, even small domestic units, shops, and commercial establishments often have connected loads well above 10 kW owing to the use of air-conditioning, appliances and other equipment. A rigid 10 kW ceiling would therefore exclude many eligible consumers from participation, defeating the very purpose of expanding the scope of VNM/GNM. The Commission also recognizes that broadening eligibility is necessary to ensure optimal utilization of available rooftops and other

spaces, thereby enhancing the overall effectiveness of distributed renewable energy adoption in the State.

38. Accordingly, the Commission decides that the eligible sanctioned load/contract demand of an individual participating consumer/connection under VNM/GNM shall be allowed upto its contract demand. This enhanced threshold will enable meaningful participation by small industries, commercial consumers, small educational institutions, small hospitals and other non-domestic categories, while still maintaining a prudent balance with grid stability considerations. The Commission is of the view that this approach will significantly expand access to the benefits of VNM/GNM, promote equitable adoption across consumer categories, and strengthen the financial and operational viability of these mechanisms.
39. The Commission is conscious that while it is expanding the scope of VNM and GNM to cover all categories of consumers, it is equally necessary to safeguard the financial and operational interests of the Discoms. In their proposal, the Discoms had suggested exemption from open access charges for domestic. The Commission finds merit in retaining this exemption, as such consumers are priority beneficiaries under national and state policies, including the *Rajasthan Integrated Clean Energy Policy, 2024* and the *PM-Surya Ghar: Muft Bijli Yojana*.
40. However, in view of the broader participation now permitted, the Commission considers it appropriate that all other categories of consumers availing VNM/GNM, shall be liable to pay open access charges as specified in other paras of this order. Such charges, are necessary to ensure recovery of legitimate costs incurred by the Discoms for maintaining and strengthening the network, as well as to maintain a level playing field among consumer categories. This safeguard will protect the financial viability of the Discoms while still providing flexibility

and opportunity for non-domestic and industrial establishments to access renewable energy through VNM/GNM.

41. The Commission has carefully considered all comments and suggestions received from stakeholders in relation to the levy of charges under the proposed framework. The petitioner has clarified that, since the plants under Group Net Metering (GNM) and Virtual Net Metering (VNM) are permitted to be installed only within the respective area of the distribution licensee, the levy of transmission charges and losses has not been considered appropriate, hence transmission charges and losses were not part of the draft proposal. Accordingly, in view of the Commission, no modifications are warranted in this regard.
42. The Commission further observes that the applicability of wheeling charges and wheeling losses is essential, both for ensuring the reliability of the distribution system and for enabling recovery of costs incurred by the utilities in creation, operation, and maintenance of the network infrastructure. However, the framework also requires an appropriate balance to encourage participation under the Virtual Net Metering (VNM) and Group Net Metering (GNM) schemes.
43. In view of the above, the Commission has decided that no transmission charges and losses shall be leviable on any category of consumers availing supply under the VNM or GNM framework. For domestic category consumers, whether the plant is self-owned or established under the RESCO model, no charges in the nature of wheeling charges and losses, transmission charges and losses, banking charges, cross-subsidy surcharge, or additional surcharge shall be applicable. This dispensation has been considered necessary to promote participation by residential consumers, who represent a significant segment of distributed renewable energy adoption.
44. For consumer categories other than domestic, the Commission has drawn a distinction between self-owned and RESCO-owned Renewable

Energy (RE) generating systems operating under Virtual Net Metering (VNM) and Group Net Metering (GNM) arrangements. In the case of self-owned systems installed on the Eligible Consumer's premises, the quantum of electricity generated shall be exempted from banking charges, wheeling charges, wheeling losses, cross-subsidy surcharge, and additional surcharge.

45. Where the self-owned Renewable Energy generating system is installed at any other location, the quantum of electricity generated shall continue to be exempted from banking charges, cross-subsidy surcharge, and additional surcharge; however, wheeling charges and wheeling losses shall be applicable at the rate corresponding to the relevant voltage level. In cases where such rate has not been separately determined by the Commission, the wheeling charges and losses applicable to the 11 kV level shall apply until such time as the same are determined by the Commission.
46. For RESCO-owned Renewable Energy generating systems established under Virtual Net Metering (VNM) and Group Net Metering (GNM) arrangements, other than for domestic consumers, where the plant is installed on the Eligible Consumer's premises, the quantum of electricity generated shall be exempted from banking charges, wheeling charges, and wheeling losses.
47. In cases where the RESCO-owned generating system is located at any other place, the quantum of electricity generated shall be exempted from banking charges; however, wheeling charges and wheeling losses shall apply at the rate corresponding to the applicable voltage level, and in the absence of such determination, the charges and losses for the 11 kV level shall be applicable until further orders of the Commission.
48. Further, for all such RESCO-owned Renewable Energy generating systems under VNM/GNM arrangements other than domestic category, the cross-subsidy surcharge and additional surcharge shall be levied at 50% of the

rates applicable to Open Access consumers. In cases where such surcharge components have not been determined by the Commission for a particular consumer category, a composite surcharge (cross-subsidy plus additional surcharge) shall be applicable at the rate of ₹1.25 per kWh, until revised by the Commission through a separate order. These provisions collectively ensure a balanced regulatory framework that promotes renewable energy deployment while safeguarding the financial interests of the Distribution Licensees.

49. In line with the existing provisions, wherein special benefits and promotional measures have been extended to domestic consumers for adjustment of excess energy under the net metering arrangement, the Commission is of the view that similar preferential treatment shall continue for domestic consumers under the Virtual Net Metering (VNM) and Group Net Metering (GNM) frameworks.
50. Regarding Parallel Operation Charges (POC) , the Commission would like to note that, vide Order dated 03.10.2025, Parallel Operation Charges (POC) have been made applicable to HT captive co-located power plants, while Rooftop Solar Plants operating under Net Metering and Gross Metering mechanisms have been excluded from the levy of POC. The same dispensation shall be applicable for Virtual Net Metering (VNM) and Group Net Metering (GNM) arrangements as well and no POC will be applicable for projects under VNM/GNM. However, in future, if the Discoms intend to levy POC on these categories, they may do so only after carrying out a detailed technical study and approaching the Commission through a separate petition for due consideration.
51. Some stakeholders have submitted that the Virtual Net Metering (VNM) and Group Net Metering (GNM) projects should be exempted from the formalities relating to the payment of application fee, meter testing charges, and execution of connection agreement. The Commission notes that, vide its Order dated 07.03.2025, certain promotional measures

and consumer-friendly relaxations were extended to domestic category consumers under the Net Metering framework. These included the waiver of application fee and security deposit for rooftop solar installations; waiver of the requirement of connection agreement for domestic consumers opting for net metering; and waiver of meter testing charges. The said order was made applicable to all eligible domestic consumers seeking to install rooftop solar systems until the achievement of the target of five lakh houses, or any other target as may be set by the State Government for rooftop solar installations in the State.

52. In continuation of the above dispensation and with the objective of promoting wider adoption of distributed solar generation, the Commission decides that the requirement of payment of application fee, security deposit, and meter testing charges shall also stand waived for domestic category consumers under the Virtual Net Metering (VNM) and Group Net Metering (GNM) arrangements. Further, the Commission is of the view that the waiver from execution of a connection agreement cannot be extended to VNM and GNM projects owing to procedural and operational necessities associated with such arrangements. However there will be no requirement for Net metering consumers for a contract agreement and Discoms need to ensure that they complete all the formalities expeditiously.
53. Accordingly, a new Regulation 15.8 shall be inserted as below, in the principal Regulations to give effect to the above dispensation.

"15.8 Notwithstanding anything contrary contained in these Regulations, the requirement of payment of application fee , security deposit and meter testing charges, for domestic category consumers installing plants under the Net Metering, Virtual Net Metering and Group Net Metering arrangement, shall stand waived off till the achievement of the target of five lakh houses, or such other target as may be specified by the State Government for rooftop solar installations in the State.

Provided that the requirement of execution of connection agreement, for domestic category consumers installing plants under Net Metering arrangement, shall stand waived off till the achievement of the target of five lakh houses, or such other target as may be specified by the State Government for rooftop solar installations in the State."

54. All other proposals of the Distribution Licensees (Discoms) relating to Battery Energy Storage Systems (BESS) exemptions, including the waiver for BESS installations, being in line with the policy of the state, have been duly incorporated.
55. Apart from the above, certain minor amendments have also been incorporated in the Principal Regulations to facilitate the effective implementation of Virtual Net Metering (VNM) and Group Net Metering (GNM) frameworks.
56. Accordingly, in view of the foregoing discussions and decisions, necessary amendments shall be carried out in Regulations 5, 6, 7, 9, 10, 12, 14, 15, 17, and 19 of the Principal Regulations, as below:

"(1) Amendment in Regulation 5:

The words "Net Metering" shall be replaced with the words "Net Metering or GNM or VNM" in this regulation.

(2) Amendments in Regulation 6:

The existing sub regulation 6.2 shall be substituted with the following:

"The Distribution Licensee shall update the information about distribution transformer level capacity available for connecting Renewable Energy generating system under Net Billing arrangement, Net Metering arrangement, Group Net Metering or Virtual Net Metering on yearly basis and shall provide the information on its website."

(3) Amendments in Regulation 7:

- (i) In the existing sub regulation 7.1 & 7.3, the words "Net Billing arrangement or Net Metering arrangement" shall be replaced by*

the words "Net Billing arrangement, Net Metering arrangement, Group Net Metering or Virtual Net Metering".

(ii) New sub regulation 7.7 shall be added as under:

"Open access shall be allowed to eligible consumers/ prosumers under Group Net Metering and Virtual Net Metering connections only for the purpose of wheeling of energy to the beneficiary consumers/ connections of the same consumer as the case may be.

Third party sale shall not be allowed under Net Metering, Group Net Metering, Virtual Net Metering and Net Billing arrangements except for RESCO model permitted under these regulations.

In case of Virtual Net Metering or Group Net Metering connections, charges and losses shall be levied on the beneficiary consumers as specified in regulation 15 of these regulations."

(4) Amendment in Regulation 9.1 and 9.2:

"The words "Net Metering" shall be replaced with the words "Net Metering or Group Net Metering or Virtual Net Metering" in this regulation."

(5) Amendments in Regulation 10:

New sub regulation 10.15 shall be added as under:

"10.15. The technical standards & power quality standards of BESS shall be as per Annexure - VII of these Regulations or any other standards as may be specified by CEA/Ministry of Power (MoP) from time to time."

(6) Amendments in Regulation 12:

New sub regulation 12.6 (A) shall be added as under:

"Group and Virtual Net Metering arrangement:

12.6(A).1 The Eligible Consumer may install the Renewable Energy generating system under the Group net Metering arrangement and Virtual Net metering arrangement specified in these Regulations, subject to following proviso that the system,

(a) shall be within the permissible technical limits as defined under these Regulations.

(b) shall operate safely in parallel with the Distribution Licensee's network.

Provided that Group Net Metering arrangement and Virtual Net Metering arrangement shall be applicable to all categories of the consumers."

12.6(A).2. Group Net Metering arrangement and Virtual Net Metering arrangement specified in these Regulations through Renewable Energy Service Company (RESCO) owned Renewable Energy generating system or, Utility Led Aggregator developed or owned Renewable Energy generating system shall be permitted:

Any land owner may lease out / rent the Rooftop Space/ Land/ Water bodies to a RESCO or Utility Led Aggregator on a mutual commercial arrangement for setting up Renewable Energy generating system under any arrangement specified in these Regulations. The Distribution Licensee will not have any role in such mutual commercial arrangement under RESCO mode.

12.6(A).3. The maximum Renewable Energy generating system capacity to be installed shall not exceed 100% of the cumulative Sanctioned Load/ Contract Demand of the participating consumers/connections:

"Provided that, the eligible Sanctioned Load/Contract Demand of the individual participating consumer/connection shall be allowed up to its Contract Demand."

Provided that the capacity of Renewable Energy generating systems shall be in conformity with the provisions relating to Sanctioned Load/ Contract Demand permissible under the Rajasthan Electricity Regulatory Commission (Electricity Supply Code & Connected Matters) Regulations, 2021 and subsequent amendments thereto.

12.6(A).4. The capacity of Renewable Energy generating system to be installed under Virtual net metering or Group net metering shall be more than one kilo watt subject to the following conditions:

Provided that, the capacity of Renewable Energy generating system to be installed shall be up to one mega-watt under Virtual net metering or Group net metering arrangements specified under these Regulations:

Provided further that, in case the Eligible Consumer intends to install Renewable Energy generating system having capacity of more than one mega-watt, terms and conditions of such arrangement shall be governed as per the Rajasthan Electricity Regulatory Commission

(Terms and Conditions for tariff determination from Renewable Energy Sources) Regulations, 2020 and subsequent amendments thereof and RERC (Terms and Conditions for Green Energy Open Access) Regulations, 2025 and subsequent amendments thereof.

Provided further that consumers having a contract demand of 100 kW or more and up to 1 MW may exercise an option to avail either Virtual Net Metering/Group Net Metering or Green Energy Open Access.

12.6(A).5. The maximum Renewable Energy generating system capacity to be installed at consumer premises under Group net metering arrangement shall also be subject to the cumulative capacity of the relevant Distribution Transformer, which has already been utilized, as specified in these Regulations.

12.6(A).6. HT (11 kV and above) Consumers opting for Group net metering, may install and connect such permitted Renewable Energy generating system under these regulations at their LT Bus Bar System:

Provided that, in such cases, the Net Meter shall be installed on the HT side of the Consumer's Transformer.

12.6(A).7. An eligible Consumer under Group net metering may install or enhance the capacity of, or upgrade the Renewable Energy generating systems after following due procedure and intimating the concerned Distribution Licensee:

Provided that, the total capacity of such systems within the same premises shall not exceed the capacity limits specified in these Regulations.

12.6(A).8. The Eligible Consumer who proposes to install a Renewable Energy generating system under Group net metering or Virtual net metering arrangement shall follow the procedures of application as specified in Regulation 8 and shall apply in the application form (Annexure – IV -C), which the Distribution Licensee shall notify on its website.

12.6(A).9. The Distribution Licensee and Eligible Consumer shall enter into a Connection Agreement for Group Net Metering arrangement or, Virtual Net Metering, after approval of connectivity of Renewable Energy generating system with the distribution network, but before the start of actual generation from the System as specified in Regulation 9. A model Virtual Net Metering Connection Agreement and Group Net Metering Connection Agreement is provided at Annexure-IV-D.

12.6(A).10. All Renewable Energy generating system and allied equipment installed under Virtual net metering arrangement and Group net metering arrangement will conform to the standards and requirements specified in Regulation 10.

12.6(A).11. All metering systems under Group net metering and Virtual net metering shall be as per the provision specified in Regulation 11 and CEA (Installation and Operation of Meters) Regulations, 2006 and subsequent amendments thereof.

Accounting for Group Net Metering:

Accounting for Group Net Metering:

12.6(A).12. In case of Group Net Metering, energy accounting and settlement shall be dealt with as under:

a) If the quantum of electricity exported by a consumer exceeds the quantum imported at the connection where Renewable Energy generating system is located during the Billing Period, the excess quantum shall be adjusted against the energy consumed in the monthly bill of service connection(s) in a sequence indicated in the priority list provided by the Consumer. The sequence of priority for adjustment shall be deemed to have begun with the service connection where the Solar Project is located.

b) The priority list for adjustment of the balance surplus energy against other electricity connection(s) may be revised by the participating consumer only once at the beginning of every financial year with an advance notice of two months;

c) If the adjusted excess quantum of electricity exceeds the quantum imported during the Billing Period of service connection(s) under Group Net Metering, the excess quantum shall be purchased by the Distribution Licensee as specified in Regulation 12.6.1 (a) with amendments thereof.

d) For Time of Day (TOD) Consumers: The quantum of electricity injection at renewable energy generating systems in any time block (e.g., peak hours, off-peak hours, etc.) shall be first compensated with the quantum of electricity imported in the corresponding time blocks in the same billing cycle of the Consumer where renewable energy generating system is located, and any excess energy injected in any time block shall be adjusted against the energy drawl in the monthly bill of service connection(s) in a sequence indicated in the priority list provided by the Consumer, as if the excess Energy Credits occurred during the off peak time block for Time of Day (TOD) Consumers. The order of settlement of such excess energy injected shall be from the lowest tariff to highest tariff ToD time block.

e) Where the service connection, where Renewable Energy generating system is located, is disconnected due to any reason under any law for the time being in force, the unadjusted units/remaining credits of that consumer shall be paid by the Distribution Licensee at the end of the financial year and shall be subjected to settlement of any pending dues of that service connection as specified in Regulation 12.6.1 (a) with amendments thereof.

f) If the quantum of electricity Units imported by the Eligible Consumer during any Billing Period exceeds the quantum exported/allocated, the net electricity consumption shall be treated according to the regulation 12.6.1(b), as amended from time to time.

Accounting for Virtual Net Metering:

12.6(A).13. In case of Virtual Net Metering, the energy accounting and settlement shall be dealt with as under:

a) The energy generated from the Renewable Energy generating system shall be credited in the monthly electricity bill of each participating consumer(s) as per the ratio of procurement from Renewable Energy generating system indicated under the agreement/MoU entered on a stamp paper by the Consumer(s) and submitted to the Distribution Licensee;

b) The Consumer(s) shall have the option to change the share of credit of electricity from Renewable Energy generating system by submitting a fresh Agreement/MoU on a stamp paper only once at the beginning of the financial year with an advance notice of two months;

c) The commercial arrangement for setting up and operating Renewable Energy generating system under Virtual net Metering between the participating Consumer(s) will be mutually agreed and the Distribution Licensee will not have any role in such commercial arrangement.

For such consumer(s), if the adjusted excess quantum of electricity exceeds the quantum imported during the Billing Period for any participating Consumer under Virtual Net Metering, the excess quantum shall be purchased by the Distribution Licensee as specified in Regulation 12.6.1 (a) with amendments thereof.

d) For Time of Day (ToD) Consumers: The quantum of energy generated at the renewable energy generating systems in any time

block (e.g., peak hours, off-peak hours, etc.) shall be first compensated with the quantum of electricity drawal in the corresponding time blocks in the same billing cycle of the Participating Consumer, as a ratio specified for each of the participating consumers. Any surplus generation over drawal in any time block in a billing cycle shall be accounted as if the surplus generation /energy credits occurred during the off-peak time block for Time of Day (ToD) Consumers. The order of settlement of such excess energy injected shall be from the lowest tariff to highest tariff ToD time block."

e) Where the service connection of any participating consumer(s) is disconnected due to any reason under any law for the time being in force, the unadjusted units/remaining credits of that consumer shall be paid by the Distribution Licensee at the end of the financial year and shall be subjected to settlement of any pending dues of the consumer(s) as specified in Regulation 12.6.1 (a) with amendments thereof;

f) If the quantum of electricity Units imported by the Eligible Consumer during any Billing Period exceeds the quantum exported/allocated, the net electricity consumption shall be treated according to the regulation 12.6.1(b), as amended from time to time.

12.6(A).14. In case of failure to meet the requirements under these Regulations, the Renewable Energy generating system or the Distribution Licensee, as the case may be, shall be liable to pay penalty as decided by the Commission from time to time."

(7) Amendment in regulation 14.1

"The words "Net Metering" shall be replaced with the words "Net Metering or Group Net Metering or Virtual Net Metering" in this regulation."

(8) Amendments in Regulation 15:

New sub regulation 15.4, 15.5, 15.6, 15.7 and 15.8 shall be added as under:

Domestic Consumers (self owned and RESCO Owned) under VNM/GNM

15.4 The quantum of electricity generated from Renewable Energy generating system under Group Net Metering arrangement or Virtual Net Metering arrangement for domestic category consumer, shall be

exempted from all charges viz banking charges, Transmission charges, Transmission losses, wheeling charges, wheeling losses, cross subsidy surcharge, and additional surcharge."

Other than Domestic consumers (Self Owned) under VNM/GNM

15.5 For other than domestic category, the quantum of electricity generated from the self-owned Renewable Energy generating system under Virtual and Group Metering arrangement, if installed on Eligible Consumer premises, shall be exempted from banking charges, Transmission charges, Transmission losses, wheeling charges, cross subsidy surcharge, wheeling losses and additional surcharge.

Provided that the quantum of electricity generated from the self-owned Renewable Energy generating system under Virtual and Group Metering arrangement, if installed at other place, shall be exempted from banking charges, Transmission charges, Transmission losses, cross subsidy surcharge, and additional surcharge.

Provided also that, if the generating plant is installed at any other location, wheeling charges and losses shall be applicable at the rate equivalent to applicable voltage level and if the same is not determined, the wheeling charges and losses of 11 KV level shall be applicable till the same is determined.

Other than Domestic consumers (RESCO owned) under VNM/GNM

15.6 The quantum of electricity generated from the RESCO-owned Renewable Energy generating system under Virtual and Group Metering arrangement other than domestic consumer, if installed on Eligible Consumer premises, shall be exempted from banking charges , Transmission charges, Transmission losses, wheeling losses and wheeling charges.

Provided that the quantum of electricity generated from the RESCO-owned Renewable Energy generating system under Virtual and Group Metering arrangement other than domestic consumer, if installed at other place, shall be exempted from banking charges, Transmission charges and Transmission losses.

Provided also that, if the generating plant is installed at any other location, wheeling charges and losses shall be applicable at the rate equivalent to applicable voltage level and if the same is not determined, the wheeling charges and losses of 11 KV level shall be applicable till the same is determined.

Provided further that, cross subsidy surcharge and additional surcharge shall be applicable for such RESCO-owned Renewable

Energy generating system under VNM/GNM, at the rate of 50% of cross subsidy surcharge and additional surcharge applicable for open access consumers.

Provided also that in case of consumer categories for which cross subsidy surcharge and additional surcharge has not been determined by the Commission, surcharge (cross subsidy plus additional surcharge), shall be applicable @ Rs 1.25/kWh for such category of consumers, till the same is revised by the Commission through a separate order.

Provided further that for Government connections availing supply under the Virtual Net Metering (VNM) or Group Net Metering (GNM) arrangements, whether under the self-owned or RESCO-owned model, no Cross Subsidy Surcharge or Additional Surcharge shall be applicable.

Waiver for Battery Energy Storage System

15.7 Provided that waiver of 75% of wheeling charges be made applicable for Virtual Net Metering or, Group Net Metering connections including RESCO owned systems, with capacity of 5% of BESS installed. For BESS beyond 5% of solar capacity will be eligible for extra exemption of additional 1% Wheeling charges on enhancement of each 1% capacity of storage system up to 30% capacity. BESS beyond 30% of solar capacity, will be exempted from 100% Wheeling charges.

Waiver of other charges

15.8 Notwithstanding anything contrary contained in these Regulations, the requirement of payment of application fee , security deposit and meter testing charges, for domestic category consumers installing plants under the Net Metering, Virtual Net Metering and Group Net Metering arrangement, shall stand waived off till the achievement of the target of five lakh houses, or such other target as may be specified by the State Government for rooftop solar installations in the State.

Provided that the requirement of execution of connection agreement, for domestic category consumers installing plants under Net Metering arrangement, shall stand waived off till the achievement of the target of five lakh houses, or such other target as may be specified by the State Government for rooftop solar installations in the State.

(9) Amendment in regulation 17

(1) The words “Net metering systems” in regulation 17.1 shall be replaced with the words “Net metering, Group net metering systems and Virtual Net Metering”.

(10) Amendment in regulation 19

Following new Regulation shall be added after regulation 19 as 19(A):

“19(A) The Commission may, by a separate order, implement Plug-and-Play Solar Systems and block chain based Peer-to-Peer (P2P) Trading, either suo-motu or upon filing of a suitable petition by the Distribution Licensees .”

Additional Comments/ Suggestions:

57. In addition to above the following comments/ suggestions have been received from the various stakeholders:

57.1 Defining Utility Led Aggregation Mode:

Commission may consider incorporating an explicit definition of "Utility-Led Aggregation Mode" in the amended regulations. The Operational Guidelines issued by the Ministry of Power on 28.12.2024 for the PM Surya Ghar: Muft Bijli Yojana offer a useful reference point in this regard.

57.2 lead Consumer and its Responsibilities

- a. Definition: The Model Agreements for virtual net metering arrangement in the proposed amendment include a nodal entity called the lead consumer created for the purpose of being the point of contact between the distribution licensee and rest of the consumers in the virtual net metering arrangement. The definition of the same may kindly be included in the Regulations themselves instead of leaving them in the agreements. This would provide the discoms or the non-lead consumers the protection of the Commission in case of

disputes, which currently lies in the jurisdiction of civil courts instead of the Commission.

- b. Defining the Responsibilities of the Lead Consumer: The Commission may further consider including a provision defining the responsibilities of a Lead Consumer in the Regulations instead of leaving such responsibilities in the model agreements.

Reference may be taken from Regulation 4.5 of the Maharashtra Electricity Regulatory Commission (Grid Interactive Rooftop Renewable Energy Generating Systems), 2019 where responsibilities of a Lead Consumer are defined as:

"4.5 Responsibilities of Lead Person:

i. He/she shall be a one of the participating consumers under Virtual Net Metering and be a signatory to Net Metering Agreement on behalf of participating consumers.

ii. He/she shall act as a Nodal person for all correspondence with Distribution Licensee.

iii. Any change in the Lead Person has to be communicated in writing with approval from all the participating consumers."

57.3 Provisions for Novation of Agreements Between Distribution Licensee and Consumers and RESCO Entities:

The Petitioner has proposed in Regulation 15.A.13 (b), Regulation 15.A.14 (b), and the model agreements for virtual and group net metering that the participating consumers shall be permitted to change the sharing ratios and priorities only once in a financial year, subject to a notice of at least two months.

In absence of any reasonable justification for the same, the Petitioner may be directed to delete this clause in the proposed model agreements. Such likely to discourage the wider adoption of

decentralised renewable energy through virtual or group net metering arrangements.

Hence, the amendment should include a provision within the Regulations allowing participating consumers, through the lead consumer, to request changes in sharing ratios, priority of allocation, or other relevant connection details on a billing cycle basis. This provision must be included in the main regulations with necessary changes in the model agreements.

Furthermore, the regulation may require the distribution licensee to implement such changes within 30 days of receipt of the notice from the lead consumer, thereby ensuring operational responsiveness and consumer flexibility.

57.4 Driving Inclusive & Scalable Solar Growth in Rajasthan

By integrating Virtual Net Metering, Group Net Metering, and Plug & Play Systems into state policy, Rajasthan can:

- Expand PM Surya Ghar's reach to every home
- Make urban solar accessible, no matter the size or ownership

Retain leadership as India's #1 solar state, not just in capacity, but in equity and impact.

Discom's Reply:

58. The Discoms have mainly submitted as follows:

58.1 Definition of Utility Led Aggregation may not introduce any special provision, which is interlinked with the State decision under the proposed regulation.

58.2 Definition of Lead Person is in line with MERC DREGS Regulations 2024. The Petitioner acknowledges the provision to incorporate eligible/ participating consumers, through the Lead Consumer

under the proposed regulations of Virtual Net Metering, i.e, clause no. [15.A.14 (b)] only.

58.3 Further, it is submitted that any additional provisions are subsequent to the contract which has to be met by the beneficiaries/ eligible/ participating/ lead consumers and may not be the part of main regulations. However, general conditions such as all the terms & conditions shall be governed by the Model Connection Agreement incorporated under the proposed regulations. Therefore, Commission may consider to amend the proposed provisions with the new one.

"15.A.14 (b)

The eligible/ participating consumers, through Lead Consumer shall have the option to change the share of credit of electricity from Renewable Energy Generating System by submitting a fresh Agreement/ MOU on a stamp paper only once at the beginning of the financial year with an advance notice of two months. Additionally, all the terms & conditions shall be as per Model Agreement for VNM Arrangement duly signed by Lead Consumer and DISCOMs"

58.4 Commission may take a view on the adoption of such technologies with a legal acceptance / eligibility for simplified subsidy and finance schemes, while considering the following:

- i. Eligible rating of the 'Plug & Play System' as it varies from 300 W — 800 W or 1000 W connected to any home socket;
- ii. The lack of formal interconnection disqualifies them from being considered under DREGS Regulations.
- iii. Since, RERC DREGS mandates safety standards, a user-installed appliances, may not meet these stringent requirements. Hence, their informal nature makes it difficult to monitor and enforce safety standards;
- iv. Plug & Play systems typically lack dedicated metering infrastructure and may not designed to interface with utility meters, making them unsuitable for inclusion in formal energy accounting frameworks.

58.5 In view of Urban Solar Access Cell (USAC), dedicatedly for fast-tracking, digitally handing or and integration of DISCOMs billing APIs with smart metering, it is . submitted that respective Discoms have already developed 'PM-Surya Ghar Cell' and are actively participating in expediting overall rooftop solar implementation in their jurisdiction areas of Rajasthan. Therefore, no such separate cell under Discoms is required.

58.6 Any launch of pilots in Jaipur, Jodhpur, Udaipur or in any districts of Rajasthan, thereby encouraging community solar projects through Virtual Net Metering (VMN) & Group Net Metering (GNM) may be executed separately by the respective Discoms and only upon finalization of amendments in the RERC DREGS Regulations 2021. Therefore, Commission may not incorporate any provisions related with execution of pilots in the proposed regulations.

58.7 The installation of Smart Meters on residential consumers are already in progress for Rajasthan Discoms with a high priority on the Government and Industrial Consumers under Revamped Distribution Sector Scheme (RDSS). Therefore, there is no separate requirement of provision for mandating smart meters for Virtual and Group Net Metering under the proposed regulation.

58.8 Since the respective Discoms have already developed a dedicated cell under 'PM-Surya Ghar Yojana', there is no such requirement of separate window for plug & play system (in case adopted by Commission) and GNM-enabled shared in EWS housing colonies.

Commission's Analysis/decision:

59. The Commission has examined the suggestions of stakeholders relating to the need for explicit definitions of *Utility-Led Aggregation Mode*, *prosumer* and *Lead Consumer*, provisions for novation of agreements, greater flexibility in allocation of credits, and facilitation of “plug-and-play” systems. While the Discoms have clarified that most of these matters are adequately addressed either under existing frameworks

(such as the PM Surya Ghar guidelines, DREGS Regulations, and Model Agreements) or through internal mechanisms already established by the Discoms, the Commission is of the view that certain refinements will improve clarity and ease of implementation.

60. In particular, the Commission concurs with the stakeholders that the concept of a *Lead Consumer* is central to the effective functioning of Virtual Net Metering arrangements, as this entity acts as the nodal point of communication between the distribution licensee and all other participating consumers. At present, the role and responsibilities of the Lead Consumer are embedded only in the model agreements. The Commission is of the view that confining such provisions to contractual documents is insufficient, as it may create uncertainty regarding the scope of authority of the Lead Consumer and the rights and obligations of participating consumers, especially in cases of disputes. By explicitly defining the *Lead Consumer* in the Regulations themselves, and setting out their core responsibilities—such as acting as the authorized signatory on behalf of participants, serving as the single point of contact with the Discom, and ensuring proper communication of any changes—the regulatory framework will provide greater transparency, procedural simplicity, and enforceability. This will also ensure that any disputes arising in relation to the Lead Consumer's role fall squarely within the jurisdiction of the Commission, thereby protecting both the Discoms and the participating consumers. Hence following definition and responsibilities of Lead Consumer shall be added in regulation 2.1 of the principal regulations as below-

“2.1(ff) Lead Consumer” means the person who is himself a participating consumer and is nominated by other participating consumers under Virtual Net Metering for making all correspondence on their behalf with the Distribution Licensee.

Responsibilities of Lead Consumer:

- i. He/she shall be a one of the participating consumers under Virtual Net Metering and be a signatory to Net Metering Agreement on behalf of participating consumers.*
- ii. He/she shall act as a Nodal person for all correspondence with Distribution Licensee.*
- iii. Any change in the Lead Person has to be communicated in writing with approval from all the participating consumers."*

61. With respect to Plug & Play Solar Systems and Peer-to-Peer (P2P) Energy Trading, the Commission observes that while these emerging technologies have the potential to democratize renewable energy adoption by enabling small-scale, consumer-driven participation, such as household-level Plug & Play or balcony solar installations ranging from 300 W to 1 kW, they also present critical technical, operational, and safety considerations. The absence of formal interconnection mechanisms, standardized communication protocols for P2P transactions, dedicated metering infrastructure, and compliance with the safety and performance standards mandated, presently constrains their seamless integration into the formal energy accounting, settlement, and regulatory frameworks.
62. In view of the above, the Commission recognizes that both Plug & Play Solar Systems and Peer-to-Peer (P2P) Energy Trading are forward-looking and consumer-centric innovations that warrant encouragement. However, the Commission concurs with the Distribution Licensees' concerns regarding the need to ensure technical safety, grid stability, metering compatibility, and cybersecurity prior to their implementation. Accordingly, the Commission directs the Distribution Licensees (Discoms) to undertake a comprehensive technical and regulatory study covering aspects such as feasibility, safety standards, metering architecture, communication interfaces, and settlement mechanisms for Plug & Play solar systems and P2P energy trading. The discoms may also take up pilot projects in this regard.
63. The Discoms shall submit a detailed report and a proposed Standard Operating Procedure (SOP) for consideration and approval of the

Commission, outlining the roadmap for phased implementation of Plug & Play Solar Systems and Peer-to-Peer Energy Trading mechanisms in the State. In respect of these new technologies, enabling provisions and scope have already been incorporated in the Regulations, to facilitate their future integration within the regulatory framework of the Commission.

64. For the other issues raised, such as separate definitions of Utility-Led Aggregation, Prosumer, additional flexibility in changing sharing ratios, creation of separate cells for urban access, or mandating smart meters under VNM/GNM, the Commission finds merit in the replies of the Discoms. These matters are either already covered under existing schemes and regulations, or are better addressed through operational guidelines and internal processes of the Discoms. Accordingly, no further changes are required in the proposed amendments on these aspects.

65. Commission vide RoP dated 15.09.2025 directed Discoms to submit additional reply for the applicability of VNM & GNM in accordance with the RERC GEOA Regulations, 2025. Also, directed to submit replies for new points raised by the stakeholders. In compliance to which, discoms submitted the reply as under:

65.1 Introduction of VNM & GNM in accordance with the RERC GEOA Regulations, 2025:

Discom's Reply:

65.1.1 The petitioner has carried out proposed amendments in accordance with the existing norms of the RERC (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and amendments thereof with the objective to account consumers having sanction load / contracted demand of more than 1 kW and upto 1 MW with individual

participating consumer / connection be capped at 10 kW under the VNM & GNM of the proposed regulation.

65.1.2 Additionally, it is highlighted that the Commission vide RERC (Terms and Conditions for Open Access) Regulations, 2016 had allowed open access to consumers with contract demand of one MVA and above and recently allowed Green Energy Open Access for any person who has contract demand or sanctioned load of 100 kW or more, either through single connection or through multiple connections aggregating one hundred (100) kW or more located in same electricity division of a distribution licensee, thereby limiting the consumers eligibility below 100 kW and for which a dedicated regulation i.e, RERC (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and amendments thereof were notified for consumers up to 01 M W within the same area of supply of the Distribution Licensee.

65.1.3 In view of the above and considering the fact wherein Discoms are responsible to abide existing regulation for ensuring grid stability at local level, capping on 10 kW on the eligible sanctioned load / contract demand of the individual participating consumers / connections with maximum 1 MW limit may be considered.

65.1.4 Therefore, Commission may consider the submission made by the petitioner, as any inclusion of VNM & GNM with the existing provisions of the RERC GEOA Regulations 2025 for 100 kW – 1 MW shall have different treatment of existing consumers, area of supply, and applicable charges with the proposed amendments by the petitioner under the domestic and government connections. Additionally, with the availability of specified regulations, it always allows the stakeholders to meet their individual objective and avail benefits accordingly.

65.2 Regarding issuance of Draft Regulation.

Discom's Reply:

65.2.1 Commission vide public notice invited Comments/ suggestions from the stakeholders before making Amendments in the Regulations from the persons likely to be affected thereby and with the last date of submission as 12.09.2025. Subsequently, the petitioner submitted the response on timely manner.

65.3 Definition of 'Utility Led Aggregation Models'.

Discom's Reply:

65.3.1 As already submitted, the term covers multiple business models where DISCOM, State Government, or other designated state entities (SNA, State Genco, autonomous bodies, etc.), individually or in combination, install rooftop solar projects on behalf of residential households, and therefore lacks a concrete definition."

65.4 Applicability of Electricity Duty (ED) Charges.

Discom's Reply:

65.4.1 The petitioner hereby submits that Electricity Duty (ED) in Rajasthan is governed by 'The Rajasthan Electricity (Duty) Act, 1962' and its associated rules and amendments thereof, which specify the collection and payment of the duty by electricity suppliers and consumers within the state. Hence, applicability of the ED under the VNIM & GNM or in any other initiatives of Discoms the matter of State Government and shall be governed as per the prevailing norms.

65.5 Incorporation of provisions related with PM-Surya Ghar : Muft Bijli Yojna and clarity on disbursement eligible Central Financial Assistance (CFA) under the proposed mechanism.

Discom's Reply:

65.5.1 The petitioner has already mentioned the reference guidelines under the submitted petition / additional submission wherein stakeholders may refer to, with an objective to eliminate any re-production of other provisions.

65.5.2 Further, any disbursement of eligible CFA under the VNM & GNM shall be in accordance with the existing Operational Guidelines for Implementation of 'Payment Security Mechanism' Component and 'Central Financial Assistance Component for RESCO Models / Utility Led Aggregation Models of PM-Surya Ghar : Muft Bijli Yojana.

65.5.3 Additionally, it is highlighted that in case of utility driven mechanism, disbursement of eligible CFA shall be accounted by respective Discom while in case of any individual applicant or association of persons, eligible CFA shall be disbursed to individual / lead applicant.

65.6 Implementation Progress of PM-KUSUM Scheme vide Component A & Component C (Feeder Level Solarization).

Discom's Reply:

65.6.1 Discom wise status under Component-A :

Table 1: Phase-I (Against 550 MW)

Discom	Awarded & PPA Executed		Commissioned	
	SPV Count (nos.)	Capacity	SPV Count (nos.)	Capacity (MW)
JVVNL	56	60	40	45
AVVNL	110	108.5	81	84.50
JdVVNL	312	426	233	327.25
Total	478	594.50	354	456.75

Table 2: Phase-II (Against 1000 MW)

Discom	Awarded & PPA Executed		Commissioned	
	SPV Count (nos.)	Capacity	SPV Count (nos.)	Capacity (MW)
JVVNL	160	231.22	-	-
AVVNL	190	25	-	-

JdVVNL	164	324	1	2.00
Total	514	830.22	1	2.00

Table 3: Phase-III (Against 3200 MW)

Discom	Awarded & PPA Executed		Commissioned	
	SPV Count (nos.)	Capacity	SPV Count (nos.)	Capacity (MW)
JVVNL	670	1268.80	-	-
AVVNL	654	1065	-	-
JdVVNL	1171	2278.25	-	-
Total	2.495	4612.05	-	-

65.6.2 Discom wise status under Component-C (FLS) :

DISCOM	Awarded Projects (LOA)			Commissioned Projects		
	Ag. Pumps Count	No. of Plants	Capacity (MW)	Ag. Pumps Count	Nos. of SPV Plants	Capacity (MW)
JVVNL	112119	404	1063.83	15912	62	147.96
AVVNL	92726	380	857.73	7966	30	70.41
JdVVNL	193717	1358	3479.27	50276	403	1058.54
Total	3,98,562	2,142	5,400.83	74,154	495	1,276.91

66. The Commission has carefully examined the additional submissions of the Discoms in response to the directions issued vide RoP dated 15.09.2025. It is observed that most of the issues raised, including eligibility norms, applicability of existing regulations, and operational aspects relating to schemes such as PM-Surya Ghar: Muft Bijli Yojna and PM-KUSUM, have either already been deliberated in earlier parts of this Order or pertain to matters governed by separate statutory frameworks and policy guidelines.

67. The Commission notes that aspects such as applicability of Electricity Duty, disbursement of Central or State Financial Assistance, are essentially within the purview of the appropriate Government or relate to ongoing scheme implementation, which are not the subject matter of the present petition. Similarly, the definitional clarification sought regarding "Utility

Led Aggregation Models" has been addressed in existing guidelines and does not warrant further regulatory intervention at this stage.

68. Accordingly, the Commission is of the considered view that no separate deliberation is required on these issues within the present proceedings. The focus of the instant amendments shall remain confined to the proposed framework for Virtual Net Metering (VNM) and Group Net Metering (GNM), while other matters will continue to be governed by the respective applicable regulations, Government notifications, and scheme guidelines.
69. The Commission notes that the petitioner submitted that the terms "Eligible Consumer" and "Participating Consumers" have already been comprehensively defined in the proposed framework, without restricting participation to any specific class of consumers. The petitioner further clarified that categories such as Societies, RWAs/GWAs, and similar collective entities have been explicitly covered under the household category. It has also been submitted that, in accordance with Clause 15A, sufficient clarity and flexibility have been incorporated to enable all eligible or participating consumers, fulfilling the prescribed criteria, to participate under the Virtual Net Metering (VNM) and Group Net Metering (GNM) arrangements. In light of these provisions, the petitioner submitted that there is no requirement for specifying separate eligibility or category/sub-category-wise conditions under the proposed Regulations. The Commission takes note of these submissions made by the petitioner.
70. The Commission has given thoughtful consideration to the fact that consumers having load above 100 kW are also eligible to avail Green Energy Open Access (GEOA) in accordance with the provisions of the Green Energy Open Access Regulation 2025. In this regard, it is clarified that such consumers, if otherwise eligible, have the discretion to choose between availing the benefits under the Virtual Net Metering (VNM) or Group Net Metering (GNM) arrangement, or to choose the Green Energy

Open Access route. The choice of framework shall rest entirely with the consumer.

71. The Commission notes that the Discoms have clarified that solar power installations set up under metering mechanisms such as Group Net Metering (GNM) and Virtual Net Metering (VNM) shall also be eligible for Central Financial Assistance (CFA), provided that the metering arrangement is duly approved by the concerned Discom subject to provisions of the scheme.
72. It has further been submitted that, in this context, the Commission may consider specifying that locations for installation of Renewable Energy (RE) systems will be such as rooftops, balconies, elevated structures, open land areas, or water bodies, for implementation under the VNM and GNM frameworks. In Commission's view the same is already covered in the Regulations and no separate provision is required.
73. Regarding CDM benefits, in our view the existing provision is sufficient and warranted no change.
74. In the light of the foregoing discussions, the finalized Regulations duly authenticated, placed below, may be published in the Official Gazette.
75. A copy of this memo, along with the finalized Regulations, may also be sent electronically and/or by post to the State Government, Central Electricity Authority (CEA), concerned Utilities and other stakeholders.

(Hemant Kumar Jain)
Member

(Dr. Rajesh Sharma)
Chairman

Annexure-I

S.No	Objectors Name
1.	Er. Yevanti Kumar Bolia
2.	Sh. Shanti Prasad
3.	Center for Energy, Environment & People
4.	Rajasthan Solar Association

Annexure-II

S.No	Objectors Name
1.	Er. Yevanti Kumar Bolia
2.	Sh. Shanti Prasad
3.	Center for Energy, Environment & People
4.	Rajasthan Solar Association

Annexure-III

S.No	Objectors Name
1.	Er. Yevanti Kumar Bolia
2.	Sh. Shanti Prasad
3.	M/S Rays Power Experts Limited
4.	Sh. D. D. Agarwal
5.	Sh. V.K. Gupta
6.	M/s Clean Max
7.	Sh. G.L. Sharma
8.	Rajasthan Renewable Energy Corporation Ltd (RRECL)
9.	Distributed Solar Power Association

RAJASTHAN STATE ELECTRICITY REGULATORY COMMISSION

Notification

October, 2025

No. RERC/Secy./Reg./ - In exercise of powers conferred under Section 181 read with Sections 61, 66, 86(1)(e) of the Electricity Act, 2003 (Act 36 of 2003) and all other provisions enabling it in this behalf, the Rajasthan Electricity Regulatory Commission after previous publication, hereby makes the following Regulations for Grid Interactive Distributed Renewable Energy Generating Systems:

1. Short title, commencement and extent of application:

- (1) These Regulations will be called the Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) (Third Amendment) Regulations, 2025.
- (2) These Regulations shall come into force from the date of their publication in the Official Gazette.

2. Amendment in Regulation 2:

- (1) The existing sub regulation 2.1(j) shall be substituted with the following:

"(j) 'Eligible Consumer' or 'Participating consumer' means a consumer of electricity in the area of supply of the Distribution Licensee, who uses or proposes to use a Renewable Energy generating system, to offset all or part or no part of the consumer's own electrical requirements, given that such systems may be owned and / or, operated by such consumer or Distribution Licensee or RESCO".

- (2) New definitions shall be added after sub regulations 2.1(cc) as under:

" 2.1(dd) Virtual net metering(VNM)" means an arrangement whereby entire energy generated / injected from a Renewable Energy System situated in single location or Battery Energy Storage System (BESS) charged through Renewable Energy System is exported to the grid from renewable energy meter/ gross meter and the energy exported is adjusted in more than one electricity service

connection(s) of participating consumers located within the same distribution licensee's area of supply;”

"2.1(ee) Group Net Metering (GNM)" means an arrangement whereby surplus energy generated / injected from a Renewable Energy System situated in single location or Battery Energy Storage System (BESS) charged through Renewable Energy System is exported to the grid through Net Meter and the exported energy is adjusted in more than one electricity service connection(s) of the same consumer located within the same distribution licensee's area of supply;

"2.1(ff) Lead Consumer" means the person who is himself a participating consumer and is nominated by other participating consumers under Virtual Net Metering for making all correspondence on their behalf with the Distribution Licensee.

Responsibilities of Lead Consumer:

- i. He/she shall be a one of the participating consumers under Virtual Net Metering and be a signatory to Net Metering Agreement on behalf of participating consumers.
- ii. He/she shall act as a Nodal person for all correspondence with Distribution Licensee.
- iii. Any change in the Lead Person has to be communicated in writing with approval from all the participating consumers."

3. Amendments in Regulation 3:

- (1) The existing sub regulation 3.2 main provision shall be substituted with the following:
 - (a) Net Metering arrangements;
 - (b) Net Billing arrangements;
 - (c) Group Net Metering

(d) Virtual Net Metering

(e) Peer to Peer (P2P) Trading

(f) Grid Interactive Distributed Renewable Energy generating systems connected behind the meter and operating in parallel with Distribution Licensees' grid and who have not opted either for Net Metering arrangement or Net Billing arrangement or Virtual Net Metering or Group Net Metering:

(g) Plug and play solar system

- (2) New provisos below existing provisos in sub regulation 3.4 shall be inserted as following:

"Provided also that, the consumer, who has opted for Net Metering arrangement, shall be allowed to enter into GNM or VNM only after termination of existing connection agreement.

Provided further that A prosumer having Net billing arrangement will not be entitled for virtual net metering or Group net metering arrangement under these Regulations."

4. Amendments in Regulation 4:

- (1) The existing sub regulation 4.1 main provision shall be substituted with the following:

"4.1 The Distribution Licensee shall offer the provision of Net Billing arrangement, Net Metering arrangement, Group Net Metering or Virtual Net Metering to the Eligible Consumer, who intends to install Grid Interactive Distributed Renewable Energy generating system in its area of supply on nondiscriminatory and 'first come first serve' basis:"

- (2) The existing sub regulation 4.2 shall be substituted with the following:

"Consumers having pending arrears with the Distribution Licensee shall not be eligible for Net Billing arrangement, Net Metering arrangement, Group Net Metering or Virtual Net Metering under these Regulations:

Provided that, where there is a dispute between the Distribution Licensee and the consumer, relating to any charge for electricity, such consumers shall be allowed Net Metering, Net Billing, Group Net Metering arrangement and Virtual Net Metering arrangement, pending such resolution of such dispute upon deposit of the disputed amount with the Distribution Licensee in accordance with Section 56 of the Act.

Provided further that, notwithstanding the pendency of arrears, Government connections, may be permitted conditional participation, subject to such arrangements and conditions as may be deemed fit to the Discoms."

5. Amendment in Regulation 5:

The words "Net Metering" shall be replaced with the words "Net Metering or GNM or VNM" in this regulation.

6. Amendments in Regulation 6:

- (1) The existing sub regulation 6.2 shall be substituted with the following:

"The Distribution Licensee shall update the information about distribution transformer level capacity available for connecting Renewable Energy generating system under Net Billing arrangement, Net Metering arrangement, Group Net Metering or Virtual Net Metering on yearly basis and shall provide the information on its website."

7. Amendments in Regulation 7:

- (1) In the existing sub regulation 7.1 & 7.3, the words "Net Billing arrangement or Net Metering arrangement" shall be replaced by the words "Net Billing arrangement, Net Metering arrangement, Group Net Metering or Virtual Net Metering".
- (2) New sub regulation 7.7 shall be added as under:

"Open access shall be allowed to eligible consumers/ prosumers under Group Net Metering and Virtual Net Metering connections only for the purpose of wheeling of energy to the beneficiary consumers/ connections of the same consumer as the case may

be.

Third party sale shall not be allowed under Net Metering, Group Net Metering, Virtual Net Metering and Net Billing arrangements except for RESCO model permitted under these regulations.

In case of Virtual Net Metering or Group Net Metering connections, charges and losses shall be levied on the beneficiary consumers as specified in regulation 15 of these regulations."

8. Amendments in Regulations 8:

The existing sub regulation 8.8 shall be replaced with the following:

"For installation of Renewable Energy Generating systems, the technical feasibility study shall be completed within a period of fifteen days and the outcome of the study shall be intimated to the applicant, failing which it shall be presumed that the proposal is technically feasible.

Provided that the applications for Renewable Energy Generating systems up to 10 kW capacity under only Domestic Category, under Net Metering or Virtual Net Metering or Group Net Metering arrangement, complete in all respects shall be deemed to have been accepted without requiring technical feasibility study and any commensurate enhancement of the sanctioned load of the consumer, as may be required, shall be carried out by the Distribution Licensee. For connections falling under other than domestic category, no such facility of deemed feasibility shall be provided.

Provided also that for Virtual Net Metering or Group Net Metering , in the case of existing consumers or generating system already connected to the system, the technical feasibility study shall be completed within a period of fifteen (15) days and the outcome of the study shall be intimated to the consumers, failing which it shall be presumed that the proposal is technically feasible.

Provided further that for Virtual Net Metering or Group Net Metering, in case of new consumers or generating system seeking fresh connectivity, the technical feasibility study shall be completed within a period of thirty (30) days and the outcome of the study shall be intimated to the consumers, failing which it shall be presumed that the proposal is technically feasible.

Provided also that for Virtual Net Metering or Group Net Metering, connectivity to the consumer or generating system, shall be granted by the Distribution Licensee within thirty (30) days from the date on which the consumers or generating system is declared technically feasible or deemed technically feasible, as the case may be."

9. Amendment in Regulation 9.1 and 9.2:

The words "Net Metering" shall be replaced with the words "Net Metering or Group Net Metering or Virtual Net Metering" in this regulation.

10. Amendments in Regulation 10:

New sub regulation 10.15 shall be added as under:

"10.15. The technical standards & power quality standards of BESS shall be as per Annexure - VII of these Regulations or any other standards as may be specified by CEA/Ministry of Power (MoP) from time to time."

11. Amendments in Regulation 12:

New sub regulation 12.6 (A) shall be added as under:

"Group and Virtual Net Metering arrangement:

12.6(A).1 The Eligible Consumer may install the Renewable Energy generating system under the Group Net Metering arrangement and Virtual Net metering arrangement specified in these Regulations, subject to following proviso that the system,

(a) shall be within the permissible technical limits as defined under these Regulations.

(b) shall operate safely in parallel with the Distribution Licensee's network.

Provided that Group Net Metering arrangement and Virtual Net Metering arrangement shall be applicable to all categories of the consumers."

12.6(A).2. Group Net Metering arrangement and Virtual Net Metering arrangement specified in these Regulations

through Renewable Energy Service Company (RESCO) owned Renewable Energy generating system or, Utility Led Aggregator developed or owned Renewable Energy generating system shall be permitted:

Any land owner may lease out / rent the Rooftop Space/ Land/ Water bodies to a RESCO or Utility Led Aggregator on a mutual commercial arrangement for setting up Renewable Energy generating system under any arrangement specified in these Regulations. The Distribution Licensee shall not have any role in such mutual commercial arrangement under RESCO mode.

- 12.6(A).3. The maximum Renewable Energy generating system capacity to be installed shall not exceed 100% of the cumulative Sanctioned Load/ Contract Demand of the participating consumers/connections:

"Provided that, the eligible Sanctioned Load/Contract Demand of the individual participating consumer/connection shall be allowed up to its Sanctioned Load/Contract Demand."

Provided that the capacity of Renewable Energy generating systems shall be in conformity with the provisions relating to Sanctioned Load/ Contract Demand permissible under the Rajasthan Electricity Regulatory Commission (Electricity Supply Code & Connected Matters) Regulations, 2021 and subsequent amendments thereto.

- 12.6(A).4. The capacity of Renewable Energy generating system to be installed under Virtual net metering or Group net metering shall be more than one kilo watt subject to the following conditions:

Provided that, the capacity of Renewable Energy generating system to be installed shall be up to one mega-watt under Virtual net metering or Group net metering arrangements specified under these Regulations:

Provided further that, in case the Eligible Consumer intends to install Renewable Energy generating system having capacity of more than one mega-watt, terms and

conditions of such arrangement shall be governed as per the Rajasthan Electricity Regulatory Commission (Terms and Conditions for tariff determination from Renewable Energy Sources) Regulations, 2020 and subsequent amendments thereof and RERC (Terms and Conditions for Green Energy Open Access) Regulations, 2025 and subsequent amendments thereof.

Provided further that consumers having a contract demand of 100 kW or more and up to 1 MW may exercise an option to avail either Virtual Net Metering/Group Net Metering or Green Energy Open Access.

12.6(A).5. The maximum Renewable Energy generating system capacity to be installed at consumer premises under Group net metering arrangement shall also be subject to the cumulative capacity of the relevant Distribution Transformer, which has already been utilized, as specified in these Regulations.

12.6(A).6. HT (11 kV and above) Consumers opting for Group net metering, may install and connect such permitted Renewable Energy generating system under these regulations at their LT Bus Bar System:

Provided that, in such cases, the Net Meter shall be installed on the HT side of the Consumer's Transformer.

12.6(A).7. An eligible Consumer under Group net metering may install or enhance the capacity of, or upgrade the Renewable Energy generating systems after following due procedure and intimating the concerned Distribution Licensee:

Provided that, the total capacity of such systems within the same premises shall not exceed the capacity limits specified in these Regulations.

12.6(A).8. The Eligible Consumer who proposes to install a Renewable Energy generating system under Group net metering or Virtual net metering arrangement shall follow

the procedures of application as specified in Regulation 8 and shall apply in the application form (Model form at Annexure – IV -C), which the Distribution Licensee shall notify on its website.

12.6(A).9. *The Distribution Licensee and Eligible Consumer shall enter into a Connection Agreement for Group Net Metering arrangement or, Virtual Net Metering, after approval of connectivity of Renewable Energy generating system with the distribution network, but before the start of actual generation from the System as specified in Regulation 9. A model Virtual Net Metering Connection Agreement and Group Net Metering Connection Agreement is provided at Annexure-IV-D.*

12.6(A).10. *All Renewable Energy generating system and allied equipment installed under Virtual net metering arrangement and Group net metering arrangement will conform to the standards and requirements specified in Regulation 10.*

12.6(A).11. *All metering systems under Group net metering and Virtual net metering shall be as per the provision specified in Regulation 11 and CEA (Installation and Operation of Meters) Regulations, 2006 and subsequent amendments thereof.*

Accounting for Group Net Metering:

12.6(A).12. *In case of Group Net Metering, energy accounting and settlement shall be dealt with as under:*

a) If the quantum of electricity exported by a consumer exceeds the quantum imported at the connection where Renewable Energy generating system is located during the Billing Period, the excess quantum shall be adjusted against the energy consumed in the monthly bill of service connection(s) in a sequence indicated in the priority list provided by the Consumer. The sequence of priority for adjustment shall be deemed to have begun with the

service connection where the Solar Project is located.

b) The priority list for adjustment of the balance surplus energy against other electricity connection(s) may be revised by the participating consumer only once at the beginning of every financial year with an advance notice of two months;

c) If the adjusted excess quantum of electricity exceeds the quantum imported during the Billing Period of service connection(s) under Group Net Metering, the excess quantum shall be purchased by the Distribution Licensee as specified in Regulation 12.6.1 (a) with amendments thereof.

d) For Time of Day (ToD) Consumers: The quantum of electricity injection at renewable energy generating systems in any time block (e.g., peak hours, off-peak hours, etc.) shall be first compensated with the quantum of electricity imported in the corresponding time blocks in the same billing cycle of the Consumer where renewable energy generating system is located, and any excess energy injected in any time block shall be adjusted against the energy drawl in the monthly bill of service connection(s) in a sequence indicated in the priority list provided by the Consumer, as if the excess Energy Credits occurred during the off peak time block for Time of Day (ToD) Consumers. The order of settlement of such excess energy injected shall be from the lowest tariff to highest tariff ToD time block.

e) Where the service connection, where Renewable Energy generating system is located, is disconnected due to any reason under any law for the time being in force, the unadjusted units/remaining credits of that consumer shall be paid by the Distribution Licensee at the end of the financial year and shall be subjected to settlement of any pending dues of that service connection as specified in Regulation 12.6.1 (a) with amendments thereof.

f) If the quantum of electricity Units imported by the Eligible Consumer during any Billing Period exceeds the

quantum exported/allocated, the net electricity consumption shall be treated according to the regulation 12.6.1(b), as amended from time to time.

Accounting for Virtual Net Metering:

12.6(A).13. In case of Virtual Net Metering, the energy accounting and settlement shall be dealt with as under:

a) The energy generated from the Renewable Energy generating system shall be credited in the monthly electricity bill of each participating consumer(s) as per the ratio of procurement from Renewable Energy generating system indicated under the agreement/MoU entered on a stamp paper by the Consumer(s) and submitted to the Distribution Licensee;

b) The Consumer(s) shall have the option to change the share of credit of electricity from Renewable Energy generating system by submitting a fresh Agreement/MoU on a stamp paper only once at the beginning of the financial year with an advance notice of two months;

c) The commercial arrangement for setting up and operating Renewable Energy generating system under Virtual net Metering between the participating Consumer(s) will be mutually agreed and the Distribution Licensee will not have any role in such commercial arrangement.

For such consumer(s), if the adjusted excess quantum of electricity exceeds the quantum imported during the Billing Period for any participating Consumer under Virtual Net Metering, the excess quantum shall be purchased by the Distribution Licensee as specified in Regulation 12.6.1 (a) with amendments thereof.

d) For Time of Day (ToD) Consumers: The quantum of

energy generated at the renewable energy generating systems in any time block (e.g., peak hours, off-peak hours, etc.) shall be first compensated with the quantum of electricity drawal in the corresponding time blocks in the same billing cycle of the Participating Consumer, as a ratio specified for each of the participating consumers. Any surplus generation over drawal in any time block in a billing cycle shall be accounted as if the surplus generation /energy credits occurred during the off-peak time block for Time of Day (ToD) Consumers. The order of settlement of such excess energy injected shall be from the lowest tariff to highest tariff ToD time block."

e) Where the service connection of any participating consumer(s) is disconnected due to any reason under any law for the time being in force, the unadjusted units/remaining credits of that consumer shall be paid by the Distribution Licensee at the end of the financial year and shall be subjected to settlement of any pending dues of the consumer(s) as specified in Regulation 12.6.1 (a) with amendments thereof;

f) If the quantum of electricity Units imported by the Eligible Consumer during any Billing Period exceeds the quantum exported/allocated, the net electricity consumption shall be treated according to the regulation 12.6.1(b), as amended from time to time.

12.6(A).14. In case of failure to meet the requirements under these Regulations, the Renewable Energy generating system or the Distribution Licensee, as the case may be, shall be liable to pay penalty as decided by the Commission from time to time."

12. Amendment in regulation 14.1

The words "Net Metering" shall be replaced with the words "Net Metering or Group Net Metering or Virtual Net Metering" in this regulation.

13. Amendments in Regulation 15:

(1) New sub regulation 15.4, 15.5, 15.6, 15.7 and 15.8 shall be added as under:

"Domestic Consumers (self owned and RESCO Owned) under VNM/GNM

15.4 The quantum of electricity generated from Renewable Energy generating system under Group Net Metering arrangement or Virtual Net Metering arrangement for domestic category consumer, shall be exempted from all charges viz banking charges, Transmission charges, Transmission losses, wheeling charges, wheeling losses, cross subsidy surcharge, and additional surcharge."

"Other than Domestic consumers (Self Owned) under VNM/GNM

15.5 For other than domestic category, the quantum of electricity generated from the self-owned Renewable Energy generating system under Virtual and Group Metering arrangement, if installed on Eligible Consumer premises, shall be exempted from banking charges, Transmission charges, Transmission losses, wheeling charges, cross subsidy surcharge, wheeling losses and additional surcharge.

Provided that the quantum of electricity generated from the self-owned Renewable Energy generating system under Virtual and Group Metering arrangement, if installed at other place, shall be exempted from banking charges, Transmission charges, Transmission losses, cross subsidy surcharge, and additional surcharge.

Provided also that, if the generating plant is installed at any other location, wheeling charges and losses shall be applicable at the rate equivalent to applicable voltage level and if the same is not determined, the wheeling charges and losses of 11 KV level shall be applicable till the same is determined.

Other than Domestic consumers (RESCO owned) under VNM/GNM

15.6 The quantum of electricity generated from the RESCO-owned Renewable Energy generating system under Virtual and Group Metering arrangement other than domestic consumer, if installed on Eligible Consumer premises, shall be exempted from banking charges , Transmission charges, Transmission losses, wheeling losses and wheeling charges.

Provided that the quantum of electricity generated from the RESCO-owned Renewable Energy generating system under Virtual and Group Metering arrangement other than domestic consumer, if installed at other place, shall be exempted from banking charges, Transmission charges and Transmission losses.

Provided also that, if the generating plant is installed at any other location, wheeling charges and losses shall be applicable at the rate equivalent to applicable voltage level and if the same is not determined, the wheeling charges and losses of 11 KV level shall be applicable till the same is determined.

Provided further that, cross subsidy surcharge and additional surcharge shall be applicable for such RESCO-owned Renewable Energy generating system under VNM/GNM, at the rate of 50% of cross subsidy surcharge and additional surcharge applicable for open access consumers.

Provided further that in case of consumer categories for which cross subsidy surcharge and additional surcharge has not been determined by the Commission, surcharge (cross subsidy plus additional surcharge), shall be applicable @ Rs 1.25/kWh for such category of consumers, till the same is revised by the Commission through a separate order.

Provided further that for Government connections availing supply under the Virtual Net Metering (VNM) or Group Net Metering (GNM) arrangements, whether under the self-owned or RESCO-owned model, no Cross Subsidy Surcharge or Additional Surcharge shall be applicable.

Waiver for Battery Energy Storage System

15.7 Provided that waiver of 75% of wheeling charges be made applicable for Virtual Net Metering or, Group Net Metering connections including RESCO owned systems, with capacity of 5% of BESS installed. For BESS beyond 5% of solar capacity will be eligible for extra exemption of additional 1% Wheeling charges on enhancement of each 1% capacity of storage system up to 30% capacity. BESS beyond 30% of solar capacity, will be exempted from 100% Wheeling charges.

Waiver of other charges

15.8 Notwithstanding anything contrary contained in these Regulations, the requirement of payment of application fee, security deposit and meter testing charges, for domestic category consumers installing plants under the Net Metering, Virtual Net Metering and Group Net Metering arrangement, shall stand waived off till the achievement of the target of five lakh houses, or such other target as may be specified by the State Government for rooftop solar installations in the State.

Provided that the requirement of execution of connection agreement, for domestic category consumers installing plants under Net Metering arrangement, shall stand waived off till the achievement of the target of five lakh houses, or such other target as may be specified by the State Government for rooftop solar installations in the State.

14. Amendment in regulation 17

(1) The words "Net metering systems" in regulation 17.1 shall be replaced with the words "Net metering, Group net metering systems and virtual Net Metering".

15. Amendment in regulation 19

Following new Regulation shall be added after regulation 19 as 19(A):

"19(A) The Commission may, by a separate order, implement Plug-and-Play Solar Systems and block chain based Peer-to-Peer (P2P) Trading, either suo-motu or upon filing of a suitable petition by the Distribution Licensees ."

By Order of the Commission

Secretary

Model Form
Annexure IV-C – Application format(s)

Annexure IV-C-1. Application form for VNM

To,

_____ <Name of Administrative officer>

_____ <Name of Distribution licensee>

Subject: Application form for Virtual Net Metering Mechanism

We intend to connect Solar Power Plant System, in compliance of Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments, under:

i. CAPEX Mode or ii. RESCO mode (Pls tick one)

1.	Name of Registered Consumer (Lead)	
2.	Address of Registered Consumer	
3.	K. No.	
4.	Email id of lead consumer (In Capital Letters)	
5.	Telephone no. of Consumer	Mobile No. WhatsApp No.
6.	For CAPEX: Name, Mobile No and email id of Installer (in Capital Letters)	
7.	For RESCO: Name, address, email id, contact number of the RESCO	
8.	Category (Please mention)	Domestic, Industrial, Commercial, Government Building, etc.
9.	Supply Voltage Level (Please mention)	230 V, 415V, 11 kV and above
10.	Aggregate sanctioned load, i.e. sum of sanctioned loads of the participating consumers as per Latest Electricity Bill (kW).	
11.	Type of Renewable Energy System Proposed (Solar, Wind, etc)	
12.	Capacity of Renewable Energy System Proposed to be connected (kW)	

13	Supply Voltage of Renewable Energy System Proposed to be connected (Please tick)	230 V (1-Phase): 415 V (3-Phase): 11 kV & above (3-Phase):
14	Location of Proposed Renewable Energy System	
15	Location Address of Renewable System	
16	Latitude (N) of Site	
17	Longitude (E) of site	
18	Area (sq-mtr)	

2. We hereby request you to provide grid connectivity to the Solar system installed or planning to be installed under VNM arrangement. Details supported by necessary evidence are furnished hereunder.

3. We declare that the information submitted for Virtual Net metering are checked and verified to best of my/ our knowledge and belief.

Enclosure: Necessary documents for Applicability as Per Annexure-IV-C-2

Place:

Date:

Signature of Participating Consumers with stamp (If any)

S.No.	K.No.	Sharing Ratio %	Address of each consumer in the list	ID Details of Eligible Consumers	Signature of Consumer
1					
2					
3					
4					
5					

Note: The List of consumers are indicative, with possibility to extend upto the requirement of the project.

FOR OFFICE USE ONLY

Application Form Number:	
Date of application:	

Annexure-IV-C-2: Necessary documents for
applicability (required to be submitted with the
application form)

S. No.	Required Documents	Attached (Yes / No)
1.	Agreement for VNM arrangement	
2.	Consumers' agreement for VNM	
3.	Self – attested Copy of ID Proofs (PAN / EPIC / Aadhar Card etc.,) of consumers	
4.	Proof of ownership of the site where Renewable Energy System is to be installed/already installed.	
5.	Self – attested Copy of ID Proofs (PAN / EPIC / Aadhar Card etc.,) of : i. EPC Contractor (for CAPEX mode) and ii. RESCO (for RESCO mode)	

Annexure IV-C-3. Application form for Group Net Metering

To,

_____ <Name of Administrative officer>

_____ <Name of Distribution licensee>

Subject: Application form for Group Net Metering Mechanism

I/We intend to connect Solar Power Plant System, in compliance of Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments.

i. CAPEX Mode or ii. RESCO mode (Pls tick one)

1.	Name of Registered Consumer (Parent Connection where RE system is to be installed)	
2.	Address of Registered Consumer	
3.	K. No.	
4.	Email ID (In Capital Letters)	
5.	Telephone No. of Consumers	Mobile No. WhatsApp No.
6.	For CAPEX: Name, Mobile No and email id of Installer (in Capital Letters)	
7.	For RESCO: Name, address, email id, contact number of the RESCO	
8.	Category (Please tick)	Domestic, Industrial, Commercial, Government Building, etc
9	Supply Voltage Level (Please tick)	230 V, 415V, 11 kV and above
10	Sanctioned Load as per Latest Electricity Bill (kW)	
11.	Type of Renewable Energy System Proposed (Solar, Wind, etc)	
12.	Capacity of Renewable Energy System Proposed to be connected (kW)	
13	Supply Voltage of Renewable Energy System Proposed to be connected (Please tick)	230 V (1-Phase): 415 V (3-Phase): 11 kV & above (3-Phase):
14	Location of Proposed Renewable Energy System (Please tick)	Rooftop Solar System: Ground Mounted System:

15	Latitude (N) of Site	
16	Longitude (E) of site	
17	Area (sq-mtr)	

I hereby request you to provide grid connectivity to the Solar roof top PV system installed or planning to install at premises owned /occupied by me. Details supported by necessary evidence are furnished hereunder. I declare that the information submitted for Group Net metering are checked and verified to the best of my knowledge and belief.

Enclosure: Documents as per "Annexure IV-C-4"

Place:

Date:

S.No.	K.No.	Applicability Priority	Address of each service connection	ID Details of Parent Consumer	Signature of Consumer with stamp (if any)
1					
2					
3					
4					
5					

Note: The List of service connections are indicative, with possibility to extend upto the requirement of the project

FOR OFFICE USE ONLY

Application Form Number:	
Date of application:	

Annexure-IV-C-4

S. No.	Required Documents	Attached (Yes / No)
1.	Agreement for GNM arrangement	
2.	Undertaking for incorporating the CA nos/ K nos. in the priority list of settlement under Group Net-metering	
3.	Self – attested Copy of ID Proofs (PAN / EPIC / Aadhar Card etc.,) of consumers	
4.	Proof of ownership of the site where Renewable Energy System is to be installed/already installed.	
5.	Self – attested Copy of ID Proofs (PAN / EPIC / Aadhar Card etc.,) of : i. EPC Contractor (for CAPEX mode) and ii. RESCO (for RESCO mode)	

Annexure IV-D – Connection agreement(s)

Annexure-B.1.: Model agreement for VNM arrangement

I. CAPEX Mode: Model agreement between participating Consumers and the DISCOM:

(On **Rs.100/-** non judicial stamp paper, duly attested by Notary)

Virtual Net Metering Model Connection Agreement for Renewable Energy

This Agreement is made and entered into at _____ <Insert the name of City and State> on date _____ <Insert the Date of Agreement Signing> between

1. The registered consumers whose name and Consumer numbers are provided in the below list ("List of Consumers") as first party (hereinafter called as "Eligible Consumers"

And

2. Distribution Licensee of the _____ <Insert the name of the State> (i.e. _____ <Insert the Name of DISCOM>), having its' registered office at _____ <Insert the address of State Utility> (hereinafter called "DISCOM") as second party to this Agreement.

List of Consumers: The list of consumers is given below.

S.No.	K.No.	Sharing Ratio %	Address of each consumer in the list	ID Details of Eligible Consumers	Signature of Consumer
1					
2					
3					
4					
5					

Note: The List of consumers are indicative, with possibility to extend upto the requirement of the project.

It is hereby agreed between the parties as follows:

1. Eligibility:

- 1.1 The Eligible Consumers do hereby confirm that they are aware, in advance, of the standards and conditions the Photovoltaic System must meet for being integrated into the grid/distribution system.
- 1.2 The Eligible Consumers agree that connection of the Photovoltaic System to DISCOM's distribution system shall be bound by requirements of the state Distribution Code and/or DISCOM's conditions of service and Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments. The grid shall continue to perform with specified reliability, security, and quality as per the Central Electricity Authority (Grid Standard) Regulations 2010 as amended from time to time.
- 1.3 The Eligible Consumers, understanding the benefits of Virtual Net-metering scheme, have agreed and jointly requested with _____ <Insert the name of State Utility> (DISCOM) to install solar meter at the premises situated at _____ <Insert the complete Address> wherein the Photovoltaic System has already been installed by the Eligible Consumers, and the Eligible Consumers have agreed for their respective share of benefits of solar units generation in their respective electricity bills, the details of which have also been specified in this Agreement.

2. Technical and Interconnection Requirements

- 2.1. The Eligible Consumers agree that they have installed/will install, prior to connection of Photovoltaic System to DISCOM's distribution system, an isolation device (both automatic and inbuilt within inverter and external manual relays) and agree for the DISCOM to have access to and operation of this device, if required, for repair and maintenance of the distribution system.
- 2.2. The Eligible Consumers agree that in case of a power outage on DISCOM's system, the Photovoltaic System will shut down, unless special transfer and isolating capabilities have been installed on photovoltaic system.
- 2.3. Technical specification of net meter and renewable energy meter should be in compliance with the DISCOM.
- 2.4. All the equipment connected to distribution system must be compliant with relevant International (IEEE/IEC) or Indian Standards (BIS) and installations of electrical equipment must comply with Indian Electricity Rules, 1956 and Central Electricity Authority (Technical Standards for Connectivity of the Distributed Generation Resources) Regulations, 2013 and their amendments.
- 2.5. The Eligible Consumers agree that DISCOM will specify the interface/inter-connection point and metering point.
- 2.6. The Eligible Consumers agree to adhere to power quality measures as per International or Indian Standards and/or other such measures provided by Commission/DISCOM.
- 2.7. The Eligible Consumers agree to furnish all the data such as voltage, frequency, and breaker, isolator position in his system, as and when required by the DISCOM. The Eligible Consumers shall also provide facilities for online transfer of the real time operational data.

- 2.8. The Eligible Consumers shall obtain requisite approvals, in accordance with the provisions of the Central Electricity Authority (Technical Standards for Connectivity of Distributed Generation Resources) Regulations, 2013 for commissioning of the Renewable Energy System, and furnish copies of approvals to the Distribution Licensee.
- 2.9. The Eligible Consumers do hereby agree that DISCOM may keep the entire information regarding application and registration of the Renewable Energy System on its website or web portal for transparency and convenience.

3. Safety:

- 3.1 Eligible Consumers shall comply with the Central Electricity Authority (Measures Relating to Safety and Electricity Supply) Regulations 2010.
- 3.2 The Eligible Consumers agree that the design, installation, maintenance, and operation of the Photovoltaic System shall be performed in a manner conducive to the safety of the Photovoltaic System as well as the DISCOM's distribution system.
- 3.3 Due to DISCOM's obligation to maintain a safe and reliable distribution system, the Eligible Consumers agree that if it is determined by DISCOM that Eligible Consumer's Photovoltaic System either causes damage to and/or produces adverse effects affecting other distribution systems' consumers or DISCOM's assets, the Eligible Consumers will have to disconnect photovoltaic system immediately from the distribution system upon direction from the DISCOM and correct the problem at its own expense prior to reconnection.
- 3.4 The Eligible Consumers agree that any change/alteration/modification/addition of new capacity in the Photovoltaic System post Net metering shall be carried out only after securing prior permission from DISCOM, which shall be issued post receipt of necessary Test certificate(s) and other documents as notified by DISCOM time to time.

4. Clearances and Approvals:

The Eligible Consumers agree to attain all the necessary approvals and clearances (environmental and grid connected related) before connecting the Photovoltaic System to the distribution system.

5. Access and Disconnection:

- 5.1 DISCOM shall have access to metering equipment and disconnecting means of Photovoltaic System, both automatic and manual, at all times.
- 5.2 In emergency or outage situation, where there is no access to any disconnecting means, both automatic and manual, such as a switch or breaker, DISCOM may disconnect service to the premise and in such scenario, the eligible consumer shall not have any right to object or to claim any sum from DISCOM citing such immediate disconnection.

6. Liabilities:

- 6.1 Eligible Consumers and DISCOM will indemnify each other for damages or adverse effects from either party's negligence or intentional misconduct in the connection and operation of Photovoltaic System or DISCOM's distribution

system.

- 6.2 DISCOM and Eligible Consumers will not be liable to each other for any loss of profits or revenues, business interruption losses, loss of contract or loss of goodwill, or for indirect, consequential, incidental, or special damages, including, but not limited to, punitive or exemplary damages, whether any of the said liability, loss or damages arise in contract or otherwise.

7. Commercial and Settlement:

All the commercial settlement under this agreement shall follow the Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments.

8. Conditions for System Connectivity

The parties shall abide by the Central Electricity Regulatory Commission Regulations in respect of procedure of grant of connectivity. The consumer shall submit the following documents to grant the connectivity:

- Synchronization Circuit Details
- Safety Report
- Protection Circuit Details
- Test Certificates of System
- Schematic diagram of Renewable Energy system

9. Connection Costs:

- 9.1. The Eligible Consumers shall bear all costs related to setting up of the Photovoltaic System including metering and interconnection costs as per estimate by DISCOM. The Eligible Consumers agree to pay the actual cost of modifications and upgrades to the distribution facilities required to connect the Photovoltaic System in case it is required.
- 9.2. Cost for interconnection equipment including the isolators, meters etc. are also to be borne by the Eligible consumers.

10. Termination:

- 10.1 The term of this Agreement shall be the life of a typical solar photovoltaic power plant, which is 25 years or till the validity of license with DISCOM, whichever is earlier, unless this Agreement is otherwise terminated as per the provisions of this clause.
- 10.2 The Eligible Consumer/s (Jointly) or DISCOM can terminate this Agreement at any time by providing 90 days prior notice to the other party to the agreement. Whereas it is clarified that in case of termination notice to be issued by DISCOM, the same shall be issued to Lead Consumer, appointed by eligible consumers.
- 10.3 The Eligible Consumers agree that upon termination of this Agreement, they must disconnect the photovoltaic system from DISCOM's distribution system in a timely manner and upto DISCOM's satisfaction.

11. Change of Sharing Ratios:

- 11.1 The Eligible Consumers shall have the right to change the Sharing Ratio

provided in the List of Consumers once at the start of financial year by sending notice in at least 2 months in advance to the DISCOM and submitting a revised List of Consumers.

- 11.2 The Eligible Consumers shall submit a Virtual Net Metering application form as applicable at the time of such proposed change in the Sharing Ratio and amendment of the List of Consumers.
- 11.3 Eligible Consumers hereby irrevocably give the right to Lead Consumer to apply on their behalf for such change of Sharing Ratio and, if applicable, introduction of a new Eligible Consumer to this Agreement and submission of the List of Consumers. Lead Consumer may sign on behalf of all eligible consumers any and all documents required by DISCOM in this regard.
- 11.4 That the consumers, for setting up/installation of solar photovoltaic power plant and during the tenure of the installation of the same, shall be liable to take all permissions/permits/approvals as required under the provisions of relevant laws.
- 11.5 That upon setting up and during the period of installation of solar photovoltaic power plant, the consumers shall jointly and severally keep DISCOM /its employees/directors/officers/associates indemnified from all cost consequences, liabilities, penalties, claim of damages/compensation etc. from any person/agency/land owning agency/court or any other judicial-quasi-judicial authority citing the establishment and/or operation & maintenance of solar photovoltaic power plant.

12. Lead Consumer:

That at the time of execution of this agreement, the eligible consumers shall appoint/nominate one of the eligible consumers as lead consumer. That for all communications issued by DISCOM, DISCOM shall be free to communicate with lead consumer and not to every consumer. It shall be the responsibility of the lead consumer to communicate with the other eligible consumers and the service of communication by DISCOM to lead consumer shall be termed as service to all eligible consumers in all respect.

13. Governing Law and Jurisdiction:

This agreement shall be governed by the Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments and any other order/directions related to establishment / maintaining / functioning of solar photovoltaic power plant. Further in case of any change in the above laws, the eligible consumers shall be liable to comply with the same.

In the witness, where of Mr./Ms. _____ and Mr./Ms. _____ for and on behalf of the Eligible Consumers and Mr./Ms. _____ for and on behalf of DISCOM agree to this agreement.

Date:

Place:

List of Consumers:

S. No.	Name of Consumer	Signature of Consumer
1		
2		
3		

Note: The List of consumers are indicative, with possibility to extend upto the requirement of the project

Name and signature of witness

Name and Signature of Lead Consumer

Name and Signature of DISCOM Nodal Officer (Along with Stamp)

II. RESCO Mode: Model Tripartite Agreement among Participating Consumers, DISCOM and RESCO:

(On Rs.100/- non judicial stamp paper, duly attested by Notary)

Virtual Net Metering Model Connection Agreement for Renewable Energy

This Agreement is made and entered into at _____ <Insert the name of City and State> on date _____ <Insert the Date of Agreement Signing>

among

1. M/S _____, a Sole- Proprietorship / Partnership Firm / Company Incorporated under Companies Act. ,having its registered office at _____ and represented through _____ Sole-Proprietor / Partner / Manager / Director / Authorised Signatory, hereinafter referred to as the "Solar Power Generator" (SPG)/Renewable Energy Service Company (RESCO), which expression shall wherever the context so permits, mean and includes the successors in interest, executors, administrators and assigns as party of the first part.

AND

2. Distribution Licensee of the _____ <Insert the name of the State> (i.e. <Insert the Name of DISCOM>), having its' registered office at _____ <Insert the address of State Utility > (hereinafter called "**DISCOM**") as second party to this Agreement.

AND

3. The registered consumers whose name and_Consumer numbers are provided in the below list("**List of Consumers**") as third party (hereinafter called as "**Eligible Consumers**")

All the above, Power Generator, the Distribution Licensee, and the Consumer shall be collectively referred to as "the Parties".

List of Consumers: The list of consumers is given below.

S.No.	K.No.	Name of Consumer	Sharing Ratio %	Address of each consumer in the list	ID Details of Eligible Consumers
1					
2					
3					
4					
5					

Note: The List of consumers are indicative, with possibility to extend upto the requirement of the project.

It is hereby agreed between the parties as follows

1. Definitions:

- 1.1. "Act" means the Electricity Act, 2003 (36 of 2003) and subsequent amendments thereof.
- 1.2. "Applicable Rules and Regulations" shall have the same meaning as defined in Article 2 of this document.
- 1.3. "Authority" shall mean the Central Electricity Authority as referred to in sub-section (1) of Section 70 of the Act.
- 1.4. "Billing cycle" shall mean the period for which regular electricity bills as specified by the Commission, are prepared for different categories of consumers by the Distribution Licensee.
- 1.5. "Commissioning Date" shall mean the date on which the Grid Connected Rooftop Solar Power Plant is synchronised and starts injecting the Solar Power to the Grid.
- 1.6. "Commission" shall mean the Rajasthan Electricity Regulatory Commission referred to in sub- Section (1) of section 82 of the Act and constituted under the Act.

2. Applicable Rules and Regulations

This agreement is subject to the following rules and regulations, hereinafter collectively referred to as the "Applicable Rules and Regulations" and includes any amendments thereof:

- 2.1. Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments.
- 2.2. Central Electricity Authority (Technical Standards for Connectivity of Distributed Generation Resources) Regulations, 2013 and amendment thereof;
- 2.3. Central Electricity Authority (Installation and Operation of Meters) Regulations, 2006 and amendment thereof;
- 2.4. Central Electricity Authority (Measures of Safety and Electricity Supply) Regulations, 2010 and amendment thereof;
- 2.5. Power Quality & Protection and Controls shall conform to the standards specified in the CEA (Technical Standards for connectivity to the grid) Regulations, 2007 and CEA (Technical Standards for Connectivity of Distributed Generation Resources) Regulations, 2013, applicable to the distribution system as amended from time to time.
- 2.6. Indian Electricity Rules, 1956.
- 2.7. Any other provision that becomes applicable at the time of signing of the PPA as per the Regulation and amendments henceforth.

All other words and expressions used in this agreement, if not specifically defined herein above, but defined in the Act, shall have the same meaning as assigned to them in the Act. The other words and expressions used herein but not specifically defined in this agreement, regulations or the Act but defined under any other law passed by the Parliament applicable to the electricity industry in the State or Union Territory shall have the same meaning assigned to them in such law.

3. Eligibility:

- 1.1. The RESCO and Eligible Consumers do hereby confirm that they are aware, in advance, of the standards and conditions the Photovoltaic System must meet for being integrated into the grid/distribution system.
- 1.2. The RESCO and Eligible Consumers agree that connection of the Photovoltaic System to DISCOM's distribution system shall be bound by requirements of the state Distribution Code and/or DISCOM's conditions of service and Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments. The grid shall continue to perform with specified reliability, security, and quality as per the Central Electricity Authority (Grid Standard) Regulations 2010 as amended from time to time.
- 1.3. The RESCO and Eligible Consumers, understanding the benefits of Virtual Net-metering scheme, have agreed and jointly requested with ____ <Insert the name of State Utility> (DISCOM) to install solar meter at the site situated at _____ <Insert the complete Address> wherein the Photovoltaic System has already been installed, and the Eligible Consumers have agreed for their respective share of benefits of solar units generation in their respective electricity bills, the details of which have also been specified in this Agreement.

2. Technical and Interconnection Requirements

- 2.1. The RESCO and Eligible Consumers agree that they have installed/will install, prior to connection of Photovoltaic System to DISCOM's distribution system, an isolation device (both automatic and inbuilt within inverter and external manual relays) and agree for the DISCOM to have access to and operation of this device, if required, for repair and maintenance of the distribution system.
- 2.2. The RESCO and Eligible Consumers agree that in case of a power outage on DISCOM's system, the Photovoltaic System will shut down, unless special transfer and isolating capabilities have been installed on photovoltaic system.
- 2.3. Technical specification of net meter and renewable energy meter should be in compliance with the DISCOM.
- 2.4. All the equipment connected to distribution system must be compliant with relevant International (IEEE/IEC) or Indian Standards (BIS) and installations of electrical equipment must comply with Indian Electricity Rules, 1956 and Central Electricity Authority (Technical Standards for Connectivity of the Distributed Generation Resources) Regulations, 2013 and their amendments.
- 2.5. The RESCO and Eligible Consumers agree that DISCOM will specify the interface/inter-connection point and metering point.
- 2.6. The RESCO and Eligible Consumers agree to adhere to power quality measures as per International or Indian Standards and/or other such measures provided by Commission/DISCOM.
- 2.7. The RESCO and Eligible Consumers agree to furnish all the data such as voltage, frequency, and breaker, isolator position in his system, as and when required by the DISCOM. The Eligible Consumers shall also provide facilities for online transfer of the real time operational data.
- 2.8. The RESCO and Eligible Consumers shall obtain requisite approvals, in accordance

with the provisions of the Central Electricity Authority (Technical Standards for Connectivity of Distributed Generation Resources) Regulations, 2013 for commissioning of the Renewable Energy System, and furnish copies of approvals to the Distribution Licensee.

- 2.9. The RESCO and Eligible Consumers do hereby agree that DISCOM may keep the entire information regarding application and registration of the Renewable Energy System on its website or web portal for transparency and convenience.

3. Safety:

- 3.1. The RESCO and Eligible Consumers shall comply with the Central Electricity Authority (Measures Relating to Safety and Electricity Supply) Regulations 2010.
- 3.2. The RESCO and Eligible Consumers agree that the design, installation, maintenance, and operation of the Photovoltaic System shall be performed in a manner conducive to the safety of the Photovoltaic System as well as the DISCOM's distribution system.
- 3.3. Due to DISCOM's obligation to maintain a safe and reliable distribution system, the RESCO and Eligible Consumers agree that if it is determined by DISCOM that Eligible Consumer's Photovoltaic System either causes damage to and/or produces adverse effects affecting other distribution systems' consumers or DISCOM's assets, the RESCO and Eligible Consumers will have to disconnect photovoltaic system immediately from the distribution system upon direction from the DISCOM and correct the problem at its own expense prior to reconnection.
- 3.4. The RESCO and Eligible Consumers agree that any change/alteration/modification/addition of new capacity in the Photovoltaic System post Net metering shall be carried out only after securing prior permission from DISCOM, which shall be issued post receipt of necessary Test certificate(s) and other documents as notified by DISCOM time to time.

4. Clearances and Approvals:

The RESCO and Eligible Consumers agree to obtain all the necessary approvals and clearances (environmental and grid connected related) before connecting the Photovoltaic System to the distribution system.

5. Access and Disconnection:

- 1.1. DISCOM shall have access to metering equipment and disconnecting means of Photovoltaic System, both automatic and manual, at all times.
- 1.2. In emergency or outage situation, where there is no access to any disconnecting means, both automatic and manual, such as a switch or breaker, DISCOM may disconnect service to the premise and in such scenario, the RESCO and eligible consumer shall not have any right to object or to claim any sum from DISCOM citing such immediate disconnection.

6. Liabilities:

- 6.1. RESCO, Eligible Consumers and DISCOM will indemnify each other for damages or adverse effects from either party's negligence or intentional misconduct in the connection and operation of Photovoltaic System or DISCOM's distribution system.

- 6.2. RESCO, DISCOM and Eligible Consumers will not be liable to each other for any loss of profits or revenues, business interruption losses, loss of contract or loss of goodwill, or for indirect, consequential, incidental, or special damages, including, but not limited to, punitive or exemplary damages, whether any of the said liability, loss or damages arise in contract or otherwise.

7. Energy Metering accounting and settlement:

7.1. All the energy generated from the solar plant will be purchased by the eligible consumers in a ratio mutually agreed upon themselves @....Rs/unit from the RESCO. The billing cycle between the RESCO and the eligible consumers will be.....

7.2. The units generated from the solar plant would be adjusted by the DISCOM in the monthly bill of the eligible consumers in a ratio mutually agreed upon themselves as per the

..... Electricity Regulatory Commission Regulations () , Clause

8. Conditions for System Connectivity

The parties shall abide by the Central Electricity Regulatory Commission Regulations in respect of procedure of grant of connectivity. The consumer shall submit the following documents to grant the connectivity:

- Synchronization Circuit Details
- Safety Report
- Protection Circuit Details
- Test Certificates of System
- Schematic diagram of Renewable Energy system

9. Connection Costs:

- 9.1. The RESCO shall bear all costs related to setting up of the Photovoltaic System including metering and interconnection costs as per estimate by DISCOM. The RESCO agrees to pay the actual cost of modifications and upgrades to the distribution facilities required to connect the Photovoltaic System in case it is required.
- 9.2. Cost for interconnection equipment including the isolators, meters etc. are also to be borne by the Eligible consumers.

10. Termination:

- 10.1. The term of this Agreement shall be the life of a typical solar photovoltaic power plant, which is 25 years or till the validity of license with DISCOM, whichever is earlier, unless this Agreement is otherwise terminated as per the provisions of this clause.
- 10.2. The RESCO, Eligible Consumer/s (Jointly) or DISCOM can terminate this Agreement at any time by providing 90 days prior notice to all the other party to the agreement. Whereas it is clarified that in case of termination notice to be issued by DISCOM, the same shall be issued to the RESCO and Lead Consumer, appointed by eligible consumers.
- 10.3. The RESCO and Eligible Consumers agree that upon termination of this Agreement, they must disconnect the photovoltaic system from DISCOM's distribution system in a timely manner and upto DISCOM's satisfaction.

11. Change of Sharing Ratios:

- 11.1 The Eligible Consumers shall have the right to change the Sharing Ratio provided in the List of Consumers once at start of every financial year by sending notice in at least __ months in advance to the RESCO and DISCOM and submitting a revised List of Consumers.
- 11.2 The Eligible Consumers shall submit a Virtual Net Metering application form as applicable at the time of such proposed change in the Sharing Ratio and amendment of the List of Consumers.
- 11.3 Eligible Consumers hereby irrevocably give the right to Lead Consumer to apply on their behalf for such change of Sharing Ratio and, if applicable, introduction of a new Eligible Consumer to this Agreement and submission of the List of Consumers. Lead Consumer may sign on behalf of all eligible consumers any and all documents required by DISCOM in this regard.
- 11.4 That the RESCO and eligible consumers, for setting up/installation of solar photovoltaic power plant and during the tenure of the installation of the same, shall be liable to take all permissions/permits/approvals as required under the provisions of relevant laws.
- 11.5 That upon setting up and during the period of installation of solar photovoltaic power plant, the RESCO and eligible consumers shall jointly and severally keep DISCOM /its employees/directors/officers/associates indemnified from all cost consequences, liabilities, penalties, claim of damages/compensation etc. from any person/agency/land owning agency/court or any other judicial-quasi-judicial authority citing the establishment and/or operation & maintenance of solar photovoltaic power plant.

12. Lead Consumer:

That at the time of execution of this agreement, the eligible consumers shall appoint/nominate one of the eligible consumers as lead consumer. That for all communications issued by DISCOM and RESCO, RESCO and DISCOM shall be free to communicate with lead consumer and not to every consumer. It shall be the responsibility of the lead consumer to communicate with the other eligible consumers and the service of communication by RESCO and DISCOM to lead consumer shall be termed as service to all eligible consumers in all respect.

13. Governing Law and Jurisdiction:

This agreement shall be governed by the Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments and any other order/directions related to establishment / maintaining / functioning of solar photovoltaic power plant. Further in case of any change in the above laws, the eligible consumers shall be liable to comply with the same.

In the witness, where of Mr./Ms. _____ and Mr./Ms. _____ for and on behalf of the Eligible Consumers, Mr./Ms. _____ for and on behalf of RESCO and Mr./Ms. _____ for and on behalf of DISCOM agree to this agreement.

Date:

Place:

List of Consumers:

S. No.	Name of Consumer	Signature of Consumer
1		
2		
3		

Note: The List of consumers are indicative, with possibility to extend upto the requirement of the project

Name and signature of witnesses

Name and Signature of Lead Consumer

Name and Signature of RESCO

Name and Signature of DISCOM Nodal Officer (Along with Stamp)

Annexure-IV-D-1.: Model agreement for GNM arrangement

I. CAPEX Mode: Model agreement between participating Consumers and the DISCOM:

(On **Rs.100/- non** judicial stamp paper, duly attested by Notary)

Group Net Metering Model Connection Agreement for Renewable Energy

This Agreement is made and entered into at _____ <Insert the name of the City and State> on date _____

between

1. The registered consumer name _____ with Consumer Number _____ residing at _____ as first party (hereinafter called as "Eligible Consumers")

and

2. Distribution Licensee of the _____ <Insert the name of State> (i.e. _____ <Insert the name of DISCOM>), having its' registered office at _____ <Insert the complete Address> (hereinafter called "DISCOM") as second party to this Agreement.

A solar photovoltaic plant of _____ <Insert the capacity of the Power Plant in kWp> ("Photovoltaic System") is installed at the premises of registered Consumer (here to call "Parent Consumer") bearing address _____ <Insert the complete Address>.

1. Eligibility:

- 1.1 The Eligible Consumer do hereby confirm that he/she is aware, in advance, of the standards and conditions the Photovoltaic System has to meet for being integrated into grid/distribution system.
- 1.2 The Eligible Consumer agree that connection of the Photovoltaic System to DISCOM's distribution system shall be bound by requirements of the state Distribution Code and/or DISCOM's conditions of service and Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments. The grid shall continue to perform with specified reliability, security, and quality as per the Central Electricity Authority (Grid Standard) Regulations 2010 as amended from time to time.
- 1.3 The list of CA numbers eligible for GNM must be of same consumer i.e. having same name and must be situated in DISCOM Licensee area for setting-off of the consumption in the billing under Group Net-metering along with the signed undertaking is also annexed at **Annexure – I** to this Agreement.
- 1.4 The Eligible Consumer do hereby confirm that it has applied connection under Group Net metering arrangement. The eligible consumer in furtherance of GNM arrangement has requested __ (concerned department) to install net-meter equipment at his/her premises situated at _____ wherein the eligible

consumer has already installed the requisite solar panels. That the consumer has also given the list of GNM service connection numbers along with their sequence for setting-off the solar generation units.

2. Technical and Interconnection Requirements

- 2.1 The Eligible Consumer agrees that he/she has installed/will install, prior to connection of Photovoltaic System to DISCOM's distribution system, an isolation device (both automatic and inbuilt within inverter and external manual relays) and agree for the DISCOM to have access to and operation of this, if required, for repair and maintenance of the distribution system.
- 2.2 The Eligible Consumer agrees that in case of a power outage on DISCOM's system, the photovoltaic system will shut down, unless special transfer and isolating capabilities have been installed on the photovoltaic system.
- 2.3 Technical specification of net meter and renewable energy meter should be in compliance with the DISCOM.
- 2.4 All the equipment connected to distribution system must be compliant with relevant International (IEEE/IEC) or Indian Standards (BIS) and installations of electrical equipment must comply with Indian Electricity Rules, 1956 and Central Electricity Authority (Technical Standards for Connectivity of the Distributed Generation Resources) Regulations, 2013 and their amendments.
- 2.5 The Eligible Consumer agrees that DISCOM will specify the interface/inter-connection point and metering point.
- 2.6 The Eligible Consumer agrees to adhere to the power quality measures as per International or Indian Standards and/or other such measures provided by Commission/DISCOM.
- 2.7 The Eligible Consumer agrees to furnish all the data such as voltage, frequency, and breaker, isolator position in his/her system, as and when required by the DISCOM. The Eligible Consumer shall also provide facilities for online transfer of the real time operational data.
- 2.8 The Eligible Consumer shall obtain requisite approvals, in accordance with the provisions of the Central Electricity Authority (Technical Standards for Connectivity of Distributed Generation Resources) Regulations, 2013 for commissioning of the Renewable Energy System, and furnish copies of approvals to the Distribution Licensee.
- 2.9 The Eligible Consumer do hereby agrees that ____ (concerned department) may keep the entire information regarding application and registration of the Renewable Energy System on its website or web portal for transparency and convenience.

3. Safety:

- 3.1 Eligible Consumer shall comply with the Central Electricity Authority (Measures Relating to Safety and Electricity Supply) Regulations 2010.
- 3.2 The Eligible Consumer agrees that the design, installation, maintenance, and operation of the photovoltaic system shall be performed in a manner conducive to the safety of the photovoltaic system as well as the DISCOM's distribution system.
- 3.3 Due to DISCOM's obligation to maintain a safe and reliable distribution

system, the Eligible Consumer agrees that if it is determined by DISCOM that Eligible Consumer's photovoltaic system either causes damage to and/or produces adverse effects affecting other distribution systems' consumers or DISCOM's assets, the Eligible Consumer will have to disconnect photovoltaic system immediately from the distribution system upon direction from the DISCOM and correct the problem at its own expense prior to reconnection.

- 3.4 The Eligible Consumer agrees that any change/alteration/modification/addition of new capacity in the photovoltaic system post Net metering shall be carried out only after securing prior permission from DISCOM, which shall be issued post receipt of necessary Test certificate(s) and other documents as notified by DISCOM time to time.

4. Clearances and Approvals:

The Eligible Consumer agrees to attain all the necessary approvals and clearances (environmental and grid connected related) before connecting the photovoltaic system to the distribution system.

5. Access and Disconnection:

- 5.1 DISCOM shall have access to metering equipment and disconnecting means of photovoltaic system, both automatic and manual, at all times.
- 5.2 In emergency or outage situation, where there is no access to any disconnecting means, both automatic and manual, such as a switch or breaker, DISCOM may disconnect service to the premise and in such scenario, the Eligible Consumer shall not have any right to object or to claim any sum from DISCOM citing such immediate disconnection.

6. Liabilities:

- 6.1 Eligible Consumer and DISCOM will indemnify each other for damages or adverse effects from either party's negligence or intentional misconduct in the connection and operation of photovoltaic system or DISCOM's distribution system.
- 6.2 DISCOM and Eligible Consumer will not be liable to each other for any loss of profits or revenues, business interruption losses, loss of contract or loss of goodwill, or for indirect, consequential, incidental, or special damages, including, but not limited to, punitive or exemplary damages, whether any of the said liability, loss or damages arise in contract, or otherwise.
- 6.3 DISCOM shall not be liable for delivery or realization by eligible consumer for any fiscal or other incentives provided by the central & state government.
- 6.4 DISCOM disclaim all warranty/guarantee/oral discussions as to the performance of system/results/outputs, benefits etc. and DISCOM shall not be responsible for any claim associated with/citing the installation/performance of the photovoltaic system.

7. Commercial and Settlement:

All the commercial settlement under this agreement shall follow the Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments.

8. Conditions for System Connectivity

The parties shall abide by the Central Electricity Regulatory Commission Regulations in respect of procedure of grant of connectivity. The consumer shall submit the following documents to grant the connectivity:

- Synchronization Circuit Details
- Safety Report
- Protection Circuit Details
- Test Certificates of System
- Schematic diagram of Renewable Energy system

9. Connection Costs:

- 9.1 The Eligible Consumer shall bear all costs related to setting up of the photovoltaic system including metering and interconnection costs as per estimate by DISCOM. The Eligible Consumer agrees to pay the actual cost of modifications and upgrades to the distribution facilities required to connect the photovoltaic system in case it is required.
- 9.2 Cost for interconnection equipment including the isolators, meters etc. are also to be borne by the Eligible consumer.

10. Termination:

- 10.1 The term of this Agreement shall be the life of a typical solar photovoltaic power plant, which is 25 years or till the validity of license with DISCOM, whichever is earlier, unless this Agreement is otherwise terminated as per the provisions of this clause.
- 10.2 The Eligible Consumer or DISCOM can terminate this Agreement at any time by providing 90 days prior notice to the other party to the agreement. Whereas it is clarified that in case of termination notice to be issued by DISCOM, the same shall be issued to the Parent Consumer.
- 10.3 The Eligible Consumer agrees that upon termination of this Agreement, he/she must disconnect the photovoltaic system from DISCOM's distribution system in a timely manner and upto DISCOM's satisfaction.

11. Change of Priority:

- 11.1 The Eligible Consumer shall have the right to change the priority provided in the List of Service connections once start of every financial year by sending notice of at least 2 months to the DISCOM and submitting a revised list of service connections.
- 11.2 The Eligible Consumer shall submit a Group Net Metering application form as applicable at the time of such proposed change in the priority and amendment of the List of service connections.
- 11.3 That the Eligible Consumer, for setting up/installation of solar photovoltaic power plant and during the tenure of the installation of the same, shall be liable to take all permissions/permits/approvals as required under the provisions of relevant laws.
- 11.4 That upon setting up and during the period of installation of solar photovoltaic power plant, the Eligible Consumer shall jointly and severally, keep DISCOM /its employees/directors/officers/associates indemnified from all cost

consequences, liabilities, penalties, claim of damages/compensation etc. from any person/agency/land owning agency/court or any other judicial-quasi-judicial authority citing the establishment and/or operation & maintenance of solar photovoltaic power plant.

12. Parent and Child Consumer:

That at the time of execution of this agreement, the Eligible Consumer shall be termed as Parent consumer and others as Child consumers with respective Applicability Priority. That for all communications issued by DISCOM, DISCOM shall be free to communicate with Parent consumer and not to every consumer.

13. Governing Law and Jurisdiction:

This agreement shall be governed by the Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments and any other order/directions in related to establishment / maintaining / functioning of solar photovoltaic power plant. Further in case of any changes in the above laws, the Eligible Consumer shall be liable to comply with the same.

In the witness, where of Mr./Ms. _____ and Mr./Ms. for and on the behalf of the Eligible Consumer and Mr./Ms _____for and on behalf of DISCOM agree to this agreement.

Date:

Place:

Name & Signature of witness

Name & Signature of registered Consumer (GNM Applicant)

Name and Signature of Nodal Officer (Along with Stamp)

II. RESCO Mode: Model Tripartite Agreement among Participating Consumers, DISCOM and RESCO

(On **Rs.100/-** non judicial stamp paper, duly attested by Notary)

Group Net Metering Model Connection Agreement for Renewable Energy

This Agreement is made and entered into at **<Insert the name of City and State>** on date **<Insert the Date of Agreement Signing>**

among

1. M/S _____, a Sole- Proprietorship / Partnership Firm / Company Incorporated under Companies Act. ,having its registered office at _____ and represented through _____ Sole-Proprietor / Partner / Manager / Director / Authorised Signatory, hereinafter referred to as the "Solar Power Generator" (SPG)/Renewable Energy Service Company (RESCO), which expression shall wherever the context so permits, mean and includes the successors in interest, executors, administrators and assigns as party of the first part.

AND

2. Distribution Licensee of the _____ <Insert the name of the State> (i.e. _____ **<Insert the Name of DISCOM>**), having its' registered office at _____ **<Insert the address of State Utility>** (hereinafter called "**DISCOM**") as second party to this Agreement.

AND

3. The registered consumer name _____with Consumer Number _____residing at _____as first party (hereinafter called as "Eligible Consumer"

All the above, Power Generator, the Distribution Licensee, and the Consumer shall be

collectively referred to as "the Parties".

It is hereby agreed between the parties as follows:

1. Definitions:

- 1.1. "Act" means the Electricity Act, 2003 (36 of 2003) and subsequent amendments thereof.
- 1.2. "Applicable Rules and Regulations" shall have the same meaning as defined in Article 2 of this document.
- 1.4. "Authority" shall mean the Central Electricity Authority as referred to in sub-section (1) of Section 70 of the Act.
- 1.5. "Billing cycle" shall mean the period for which regular electricity bills as specified by the Commission, are prepared for different categories of consumers by the Distribution Licensee.
- 1.6. "Commissioning Date" shall mean the date on which the Grid Connected Rooftop Solar Power Plant is synchronized and starts injecting the Solar Power to the Grid.
- 1.7. "Commission" shall mean the Rajasthan Electricity Regulatory Commission referred to in sub- Section (1) of section 82 of the Act and constituted under the Act.

2. Applicable Rules and Regulations

This agreement is subject to the following rules and regulations, hereinafter collectively referred to as the "Applicable Rules and Regulations" and includes any amendments thereof:

- 2.1. Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments.
- 2.2. Central Electricity Authority (Technical Standards for Connectivity of Distributed Generation Resources) Regulations, 2013 and amendment thereof;
- 2.3. Central Electricity Authority (Installation and Operation of Meters) Regulations, 2006 and amendment thereof;
- 2.4. Central Electricity Authority (Measures of Safety and Electricity Supply) Regulations, 2010 and amendment thereof;
- 2.5. Power Quality & Protection and Controls shall conform to the standards specified in the CEA (Technical Standards for connectivity to the grid) Regulations, 2007 and CEA (Technical Standards for Connectivity of Distributed Generation Resources) Regulations, 2013, applicable to the distribution system as amended from time to time.
- 2.6. Indian Electricity Rules, 1956.
- 2.7. Any other provision that becomes applicable at the time of signing of the PPA as per the Regulation and amendments henceforth.

All other words and expressions used in this agreement, if not specifically defined herein above, but defined in the Act, shall have the same meaning as assigned to them in the Act. The other words and expressions used herein but not specifically defined in this agreement, regulations or the Act but defined under any other law passed by the Parliament applicable

to the electricity industry in the State or Union Territory shall have the same meaning assigned to them in such law.

3. Eligibility:

- 3.1. The RESCO and Eligible Consumer do hereby confirm that he/she is aware, in advance, of the standards and conditions the Photovoltaic System has to meet for being integrated into grid/distribution system.
- 3.2. The RESCO and Eligible Consumer agree that connection of the Photovoltaic System to DISCOM's distribution system shall be bound by requirements of the state Distribution Code and/or DISCOM's conditions of service and Rajasthan Electricity Regulatory Commission (Grid Interactive Distributed Renewable Energy Generating Systems) Regulations, 2021 and any further amendments. The grid shall continue to perform with specified reliability, security, and quality as per the Central Electricity Authority (Grid Standard) Regulations 2010 as amended from time to time.
- 3.3. The list of CA numbers eligible for GNM must be of same consumer i.e. having same name and must be situated in DISCOM Licensee area for setting-off of the consumption in the billing under Group Net-metering along with the signed undertaking is also annexed at **Annexure – F** to this Agreement.
- 3.4. The RESCO and Eligible Consumer do hereby confirm that it has applied connection under Group Net metering arrangement. The eligible consumer in furtherance of GNM arrangement has requested __ (concerned department) to install net-meter equipment at his/her premises situated at _____ wherein the RESCO and eligible consumer is going to/has already installed the requisite solar panels. That the consumer has also given the list of GNM service connection numbers along with their sequence for setting-off the solar generation units.

4. Technical and Interconnection Requirements

- 4.1. The RESCO and Eligible Consumer agrees that he/she has installed/will install, prior to connection of Photovoltaic System to DISCOM's distribution system, an isolation device (both automatic and inbuilt within inverter and external manual relays) and agree for the DISCOM to have access to and operation of this, if required, for repair and maintenance of the distribution system.
- 4.2. The RESCO and Eligible Consumer agrees that in case of a power outage on DISCOM's system, the photovoltaic system will shut down, unless special transfer and isolating capabilities have been installed on the photovoltaic system.
- 4.3. Technical specification of net meter and renewable energy meter should be in compliance with the DISCOM.
- 4.4. All the equipment connected to distribution system must be compliant with relevant International (IEEE/IEC) or Indian Standards (BIS) and installations of electrical equipment must comply with Indian Electricity Rules, 1956 and Central Electricity Authority (Technical Standards for Connectivity of the Distributed Generation Resources) Regulations, 2013 and their amendments.
- 4.5. The RESCO and Eligible Consumer agrees that DISCOM will specify the

interface/inter- connection point and metering point.

- 4.6. The RESCO and Eligible Consumer agrees to adhere to the power quality measures as per International or Indian Standards and/or other such measures provided by Commission/DISCOM.
- 4.7. The RESCO and Eligible Consumer agrees to furnish all the data such as voltage, frequency, and breaker, isolator position in his/her system, as and when required by the DISCOM. The Eligible Consumer shall also provide facilities for online transfer of the real time operational data.
- 4.8. The RESCO and Eligible Consumer shall obtain requisite approvals, in accordance with the provisions of the Central Electricity Authority (Technical Standards for Connectivity of Distributed Generation Resources) Regulations, 2013 for commissioning of the Renewable Energy System, and furnish copies of approvals to the Distribution Licensee.
- 4.9. The RESCO and Eligible Consumer do hereby agrees that _____ (concerned department) may keep the entire information regarding application and registration of the Renewable Energy System on its website or web portal for transparency and convenience.

5. Safety:

- 5.1. The RESCO and Eligible Consumer shall comply with the Central Electricity Authority (Measures Relating to Safety and Electricity Supply) Regulations 2010.
- 5.2. The RESCO and Eligible Consumer agree that the design, installation, maintenance, and operation of the photovoltaic system shall be performed in a manner conducive to the safety of the photovoltaic system as well as the DISCOM's distribution system.
- 5.3. Due to DISCOM's obligation to maintain a safe and reliable distribution system, the RESCO and Eligible Consumer agree that if it is determined by DISCOM that Eligible Consumer's photovoltaic system either causes damage to and/or produces adverse effects affecting other distribution systems' consumers or DISCOM's assets, the RESCO and Eligible Consumer will have to disconnect photovoltaic system immediately from the distribution system upon direction from the DISCOM and correct the problem at its own expense prior to reconnection.
- 5.4. The RESCO and Eligible Consumer agree that any change/alteration/modification/addition of new capacity in the photovoltaic system post Net metering shall be carried out only after securing prior permission from DISCOM, which shall be issued post receipt of necessary Test certificate(s) and other documents as notified by DISCOM time to time.

6. Clearances and Approvals:

The Eligible Consumer agrees to attain all the necessary approvals and clearances (environmental and grid connected related) before connecting the photovoltaic system to the distribution system.

7. Access and Disconnection:

- 7.1. DISCOM shall have access to metering equipment and disconnecting means of

photovoltaic system, both automatic and manual, at all times.

- 7.2. In emergency or outage situation, where there is no access to any disconnecting means, both automatic and manual, such as a switch or breaker, DISCOM may disconnect service to the premise and in such scenario, the RESCO and Eligible Consumer shall not have any right to object or to claim any sum from DISCOM citing such immediate disconnection.

8. Liabilities:

- 8.1. The RESCO, Eligible Consumer and DISCOM will indemnify each other for damages or adverse effects from either party's negligence or intentional misconduct in the connection and operation of photovoltaic system or DISCOM's distribution system.
- 8.2. DISCOM, RESCO and Eligible Consumer will not be liable to each other for any loss of profits or revenues, business interruption losses, loss of contract or loss of goodwill, or for indirect, consequential, incidental, or special damages, including, but not limited to, punitive or exemplary damages, whether any of the said liability, loss or damages arise in contract, or otherwise.
- 8.3. DISCOM shall not be liable for delivery or realization by RESCO and eligible consumer for any fiscal or other incentives provided by the central & state government.
- 8.4. DISCOM disclaim all warranty/guarantee/oral discussions as to the performance of system/results/outputs, benefits etc. and DISCOM shall not be responsible for any claim associated with/citing the installation/performance of the photovoltaic system.

9. Energy Metering accounting and settlement:

- 9.1. All the energy generated from the solar plant will be purchased by the eligible consumer @....Rs/unit from the RESCO. The billing cycle between the RESCO and the eligible consumers will be.....
- 9.2. The units generated from the solar plant would be adjusted by the DISCOM in the monthly bill of the eligible consumer and in his different service connections as per the Electricity Regulatory Commission Regulations () , Clause

10. Conditions for System Connectivity

The parties shall abide by the Central Electricity Regulatory Commission Regulations in respect of procedure of grant of connectivity. The consumer shall submit the following documents to grant t h e connectivity:

- Synchronization Circuit Details
- Safety Report
- Protection Circuit Details
- Test Certificates of System
- Schematic diagram of Renewable Energy system

11. Connection Costs:

- 11.1. The RESCO shall bear all costs related to setting up of the photovoltaic system including metering and interconnection costs as per estimate by DISCOM.
- 11.2. The RESCO agrees to pay the actual cost of modifications and upgrades to the distribution facilities required to connect the photovoltaic system in case it is

required.

- 11.3. Cost for interconnection equipment including the isolators, meters etc. are also to be borne by the RESCO.

12. Termination:

- 12.1. The term of this Agreement shall be the life of a typical solar photovoltaic power plant, which is 25 years or till the validity of license with DISCOM, whichever is earlier, unless this Agreement is otherwise terminated as per the provisions of this clause.
- 12.2. The Eligible Consumer or DISCOM or RESCO can terminate this Agreement at any time by providing 90 days prior notice to the all the other party to the agreement.
- 12.3. The RESCO and Eligible Consumer agrees that upon termination of this Agreement, he/she must disconnect the photovoltaic system from DISCOM's distribution system in a timely manner and upto DISCOM's satisfaction.

13. Change of Priority:

- 13.1. The Eligible Consumer shall have the right to change the Priority provided in the List of Service connections once every financial year by sending notice of at least 2 months to the DISCOM and submitting a revised list of service connections.
- 13.2. The Eligible Consumer shall submit a Group Net Metering application form as applicable at the time of such proposed change in the priority and amendment of the List of service connections.
- 13.3. That the RESCO and Eligible Consumer, for setting up/installation of solar photovoltaic power plant and during the tenure of the installation of the same, shall be liable to take all permissions/permits/approvals as required under the provisions of relevant laws.
- 13.4. That upon setting up and during the period of installation of solar photovoltaic power plant, the RESCO and Eligible Consumer shall jointly and severally, keep DISCOM /its employees/directors/officers/associates indemnified from all cost consequences, liabilities, penalties, claim of damages/compensation etc. from any person/agency/land owning agency/court or any other judicial-quasi-judicial authority citing the establishment and/or operation & maintenance of solar photovoltaic power plant.

14. Parent and Child Consumer:

That at the time of execution of this agreement, the Eligible Consumer shall be termed as Parent consumer and others as Child consumers with respective Applicability Priority. That for all communications issued by DISCOM and RESCO, they shall be free to communicate with Parent consumer and not to every consumer.

In the witness, where of Mr./Ms. _____ and Mr./Ms. for and on the behalf of the Eligible Consumer, Mr./Ms _____ for and on behalf of the RESCO and Mr./Ms

_____ for and on behalf of DISCOM agree to this agreement. Date:

Place:

Name & Signature of witnesses

Name & Signature of registered Consumer (GNM Applicant)

Name and Signature of RESCO (Along with Stamp)

Name and Signature of Nodal Officer (Along with Stamp)

Undertaking for incorporating the CA nos. in the priority list of settlement under Group Net-metering

I, _____ Son/Daughter of _____ Resident of _____ (hereinafter referred to as "GNM Beneficiary", which term shall mean and include executors, administrators, heirs, successors and assigns), do hereby swear and declare as under:

- i. That the GNM Beneficiary is aware that a Group Net Metering connection has been applied by "GNM Applicant" at the premises situated at _____.
- ii. That GNM Beneficiary is aware that name/CA No/s. of GNM Beneficiary have been given by the GNM Applicant for availing of benefits under GNM Scheme.
- iii. That GNM Beneficiary would like to avail the benefits associated with the GNM Connection issued to GNM Applicant as such submitting this instant undertaking confirming the terms herein.
- iv. That GNM Beneficiary confirms and understands that this present undertaking shall form part of the GNM Application Form submitted by the GNM Applicant and shall be construed in addition to the declarations and undertakings provided therein.

That the GNM Beneficiary hereby agree and undertake: -

- a. That GNM Beneficiary is the Registered Consumer (RC) for the CA No. _____ installed at the premises _____, whereas the GNM Applicant is the owner of the premises.
- b. That GNM Beneficiary has no objection if the CA No. _____ is being added to the benefits of GNM Connection issued to GNM Applicant in a manner as requested/agreed by GNM Applicant in the GNM Application.
- c. That GNM Beneficiary do hereby agree and undertake that it shall have no objection for the benefit credited, calculation of billing units under GNM Scheme as notified by Government/Competent Authority time to time.
- d. That GNM Beneficiary do hereby agree and undertake for calculation of units or the issues associated with the same the billing units may be revised by DISCOM in consideration of GNM Guidelines or any other issues and the same shall not give any rise to any claim from GNM Beneficiary against ____ (concerned department).
- e. That GNM Beneficiary has given its consent to GNM Applicant for inclusion of GNM Beneficiary for the benefits of Group Net Metering and understand that the nomination of GNM Beneficiary is at the discretion of GNM Applicant and the GNM applicant, at all times, shall be free to change the sequence of GNM Beneficiary and/or drop GNM Beneficiary from the benefits without any prior

intimation and the same shall not give any rise to any claim from GNM Beneficiary against DISCOM.

- f. That GNM Beneficiary shall at all time keep DISCOM indemnified from all law suits/claims/action/liabilities associated with the inclusion/dropping of GNM Beneficiary from the benefits of Group Net Metering.
- g. That GNM Beneficiary undertakes to deposit the necessary document and permissions with DISCOM as and when demanded by DISCOM.
- h. That GNM Beneficiary shall take necessary permissions from the concerned authorities and shall submit the same with DISCOM, as notified by DISCOM time to time.
- i. The GNM Beneficiary confirms and agrees that in case of violation of the terms as stated in this undertaking and other terms as agreed by him/her, DISCOM shall be having full right to drop GNM Beneficiary from the benefits of Group Net Metering.

Signature of GNM Beneficiary

VERIFICATION:

Verified at _____ <Insert the name of the City and State> that the contents of the above self-declaration are true and correct to the best of my knowledge and belief. This is to declare that No word and/or any statement has been amended/altered/reframed in connection agreement as provided by DISCOM for the needful process of Group Net Metering (GNM) Application.

Signature of GNM Beneficiary

Annexure VII

A. Codes and Standards

The BESS shall comply with the following Codes and Standards or equivalent Indian Standards, as applicable.

Standard	Description	Certification Requirements
IEC 62485-2	Safety requirements for secondary batteries and battery installations - to meet requirements on safety aspects associated with the erection, use, inspection, maintenance and disposal: Applicable for Lead Acid and NiCd / NiMH batteries	Applicable only for Lead Acid and NiCd / NiMH batteries
UL 1642 or UL 1973, Appendix E (cell) or IEC 62619 (cell) + IEC 63056 (cell)	Secondary cells and batteries containing alkaline or other non-acid electrolytes - Safety requirements for secondary lithium cells and batteries, for use in industrial applications	Required for Cell
UL 1973 (battery) or (IEC 62619 (battery) + IEC 63056 (battery))	Batteries for Use in Stationary, Vehicle Auxiliary Power and Light Electric Rail (LER) Applications / Secondary cells and batteries containing alkaline or other nonacid electrolytes - Safety requirements for secondary lithium cells and batteries, for use in industrial applications	Either UL 1642 or UL1973 or (IEC 62619 + IEC 63056) for the Battery level
IEC 62281 / UN 38.3	Safety of primary and secondary lithium cells and batteries during transport: Applicable for storage systems using Lithium Ion chemistries	Required for both Battery and Cell
IEC 61850/ DNP3	Communications networks and management systems. (BESS control system communication)	
UL 9540 or (IEC TS 62933- 5-1 + IEC 62933-5-2)	Electrical energy storage (EES) systems - Part 5-1: Safety considerations for grid integrated EES systems – General specification / Standard for Energy Storage Systems and Equipment	Either UL9540 or (IEC 62933-5-1 + IEC 62933-5- 2) is required for BESS system level

Power Conditioning Unit Standards for BESS	
IEC 62909-1	Bi-directional grid connected power converters - Part 1: General requirements
IEC 62909-2 (if applicable)	Bi-directional grid-connected power converters - Part 2: Interface of GCPC

	and distributed energy resources
IEC 61683 Ed.1	Photovoltaic systems - Power conditioners - Procedure for measuring efficiency
IEC 61000-6-2 Ed. 2	Electromagnetic compatibility (EMC) - Part 6-2: Generic standards - Immunity standard for industrial environments
IEC 61000-6-4 Ed. 2.1	Electromagnetic compatibility (EMC) - Part 6-4: Generic standards - Emission standard for industrial environments
IEC 62116 Ed. 2	Utility-interconnected photovoltaic inverters - Test procedure of islanding prevention measures
IEC 60068-2-1:2007	Environmental testing - Part 2-1: Tests - Test A: Cold
IEC 60068-2-2:2007	Environmental testing - Part 2-2: Tests - Test B: Dry heat
IEC 60068-2-14:2009	Environmental testing - Part 2-14: Tests - Test N: Change of temperature
IEC 60068-2-30:2005	Environmental testing - Part 2-30: Tests - Test Db: Damp heat, cyclic (12 h + 12 h cycle)

B. General Specifications

1. Identification and Traceability: Cells/Racks/Packs Assembly shall meet seismic requirement for the plant location of the BESS. Labelling of cells/batteries shall include manufacturer's name, cell type, name-plate rating, date of manufacture and date of expiry of parts and labour warranty.

2. Other Sub-systems/Components: Other subsystems/components used in the BESS must also conform to the relevant international/national Standards for Electrical Safety besides that for Quality required for ensuring Expected Service Life and Weather Resistance.

3. Fire Protection: The Battery Energy Storage System Developer (BESSD) shall design and install a fire protection system that conforms to national and local codes. The fire protection system design and associated alarms shall take into account that the BESS will be unattended at most times. For high energy density technologies, the BESSD shall also obtain thermal runaway characterization of the battery storage systems.

4. Authorized Test Centres: Batteries/ Power Conditioning Units deployed in the power plants must have valid test certificates for their qualification as per above specified IEC/ BIS Standards by one of the ILAC member signatory accredited laboratories. In case of module types/BESS/equipment for which such Test facilities may not exist in India at present, test certificates from reputed ILAC Member body accredited Labs abroad will be acceptable.

5. Warranty: BESSD shall procure performance guarantees to ensure minimum performance levels for predefined application(s) as per the terms of the Tender Document / RfS document. The Warranty shall clearly indicate life expectancy given discharge profiles provided for the application.

C. Performance Monitoring

As part of the performance monitoring, the following shall be carried out:

a) The BESSD must install necessary equipment to continuously measure BESS operating

parameters (including but not limited to voltage, current, ambient conditions etc.) as well as energy input into and energy output from the BESS along with Metering arrangement in accordance with extant regulations. They will be required to submit this data to the concerned authorities / organizations on-line and/or through a report on regular basis every month for the entire duration of contract.

- b) The SPDs shall provide access to the concerned authorities / organisations or their authorized representatives for installing any additional monitoring equipment to facilitate on-line transfer of data.
- c) All data shall be made available as mentioned above for the entire duration of the Contract.
- d) The plant SCADA should be OPC version 2.0a (or a later version including OPC UA) compliant and implement appropriate OPC-DA server as per the specification of OPC Foundation. All data should be accessible through this OPC server for providing real time online data (BESS parameters) to the concerned authorities/organisations. This time series data shall be available from the Project SCADA system to facilitate monitoring and should include among others as stated before, parameters to facilitate daily, monthly and annual report for performance monitoring.
- e) Web-based monitoring should be available, which should not be machine-dependent. The web based monitoring should provide the same screens as available in the plant. Also, it should be possible to download reports from a remote web-client in PDF or Excel format.

D. Safe Disposal of unit Batteries from the BESS

The Developer will comply with the requirements under Hazardous & other Waste (Management and Transboundary Movement) Rules, 2016, as amended from time to time, as applicable. The BESSD shall ensure that all Unit Battery modules from the plant after their 'end of life' (when they become defective/ non-operational/ non-repairable) are disposed in accordance with the "e-waste (Management and Handling) Rules, 2016" notified by the Government and as revised and amended from time to time and Battery Waste Management Rules, notified by the Government of India from time to time.