

**BEFORE THE GUJARAT ELECTRICITY REGULATORY COMMISSION
GANDHINAGAR**

In the matter of: Gujarat Electricity Regulatory Commission (Net Metering Rooftop Solar PV Grid Interactive Systems) (First Amendment) Regulations, 2017.

CORAM:

Shri Anand Kumar, Chairman

Shri K.M.Shringarpure, Member

Shri P.J.Thakkar, Member

STATEMENT OF REASONS

Background:

The Electricity Act, 2003 and the Regulations framed thereunder envisage promotion of Renewable Sources of energy generation and consumption. The Government of India has pronounced the National Electricity Policy, Tariff Policy etc. which also envisage generation and consumption of energy from the Renewable Energy Sources including the Solar energy in the country. As a part of the same, the installation of Rooftop Solar Projects is being encouraged at the consumers' place so that it will result in reduction in the distribution loss, utilization of idle space available with small Rooftop owners and reduce the dependency on fossil fuel based generation.

The Commission has notified Gujarat Electricity Regulatory Commission (Net Metering Rooftop Solar PV Grid Interactive Systems) Regulations 2016 vide

Notification No. 5/2016 in this regard. The said notification provides that the consumers are eligible to set up Rooftop Solar Power Plants of capacity upto 50% of consumer's Contract demand/Sanctioned Load. Further, it is provided that the installed capacity shall not be less than 1kW and shall not exceed 1MW. It is also provided that the variance of $\pm 5\%$ shall be allowed in the Installed Capacity.

The Commission received letters from Energy & Petrochemicals Department, Government of Gujarat and Gujarat Urja Vikas Nigam Limited stating that the Government of Gujarat has amended the Gujarat Solar Power Policy 2015 notified earlier vide G.R. No. SLR/11/2015/2442/B dated 13.08.2015 vide Notification No. SLR/11/2015/401/B dated 13.04.2017 and removed the restriction on capacity of Solar Rooftop Power Projects at Residential Consumers' premises which was earlier kept at 50% of Sanctioned load/Contract demand of the consumers and allowed the installation of Solar capacity irrespective of their sanctioned load/contract demand.

Additional Secretary, Energy & Petrochemicals Department, Government of Gujarat vide letter dated 8.05.2017 submitted that the Rooftop Solar Power Plants have inherent advantages like consumption at the site of generation place only, no distribution losses, utilization of idle space available with small rooftop

owners and least burden on distribution system. Due to the provisions of capacity restriction of 50% of the Sanctioned load/Contracted demand, small residential rooftop owners, in some cases, could not install higher capacity of Rooftop Solar Plant even if the rooftop or terrace is available. Therefore, Government of Gujarat vide G.R. No. SLR/11/2015/401/B dated 13.04.2017 amended the Solar Policy 2015 issued earlier vide G.R. No. SLR/11/2015/2442/B dated 13.08.2015, as under:

“For residential consumers across the State, a condition that Rooftop Solar Plant can be installed up to a maximum of 50% of consumer’s sanctioned load, is hereby removed. Accordingly, residential consumers in the State will be allowed to install Rooftop Solar Plant, irrespective of whatever is their sanctioned load.”

It was requested that the Commission may amend the Gujarat Electricity Regulatory Commission (Net Metering Rooftop Solar PV Grid Interactive Systems) Regulations 2016 by incorporating necessary changes in this regard.

The Commission has examined the request of Government of Gujarat in the light of optimum utilization of the rooftop space of the residential consumers and the advantages of such system to the licensee and consumers. Moreover, the said

request was also examined from the perspective of Central Government's target of achieving Solar RPO of 8% by 2022.

Accordingly, the Commission initiated the procedure for amendment in Gujarat Electricity Regulatory Commission (Net Metering Rooftop Solar PV Grid Interactive Systems) Regulations 2016 under Section 61, 86, and 181 of the Electricity Act, 2003 by issuing draft amendment Regulations, 2017. A Public Notice in this regard was issued in Gujarat Samachar and Divya Bhaskar on 15.06.2017 and in Business Standard on 14.06.2017. Moreover, the draft Regulations along with public notice were hosted on the Commission's website inviting comments and suggestions from the stakeholders on the aforesaid proposed amendment in the Regulations as per the provisions of the Gujarat Electricity Regulatory Commission (Procedure for Previous Publication of Regulations to be made under Section 181 of the Electricity Act, 2003) Order.

In response to above, the Commission received comments and suggestions from various stakeholders. A list of the same is kept at **Annexure A** with this Statement of Reasons.

The Commission conducted public hearing on 7.07.2017. A list of stakeholders who remained present and represented their views on the subject matter during the public hearing is kept at **Annexure B** with this Statement of Reasons.

VIEWS OF THE STAKEHOLDERS AND ANALYSIS AND DECISION OF THE COMMISSION ON IMPORTANT ISSUES

We deal with the various objections/suggestions raised by the stakeholders hereunder:

1. **Regulation 6.2, Clause 1.3 of Annexure –IV and first bullet point of Sub-Activity (3) of the Regulation 7 of the Principal Regulations**
- 1.1. **Objections raised by the Objectors:**

Government of Gujarat, GUVNL, GEDA have suggested that the restriction of 50% of the Sanctioned load/Contract demand for installation of Rooftop Solar capacity in respect of Residential consumers provided in Regulation 6.2 of the existing Regulations be removed and the Residential consumer may be allowed to install Rooftop Solar Project with capacity irrespective of the Sanctioned load/Contract demand of such consumers. However, this restriction of 50% of the sanctioned load/contract demand on installation of Solar Rooftop Project for other consumers be continued.

Torrent Power Limited submitted that the proposed amendment to Regulation 6.2, if approved, will create technical difficulty for the distribution licensee in designing its network and catering to the demand of its consumers as the network is designed by taking into consideration the forecast of load/demand. It will create a situation of net export which will raise the issues of safety since existing network does not have the capacity to evacuate the excess energy. This would mandate licensee to augment the network and suggested to give clarity w.r.t recovery of cost as well. This will also lead to the Residential consumers installing Solar PV Power Plant not for captive consumption but for their commercial consideration.

1.2. **Analysis and Decision of Commission:**

We note that Regulation 6.2 of the Gujarat Electricity Regulatory Commission (Net Metering Rooftop Solar PV Grid Interactive Systems) Regulations 2016 and Annexure (IV) to the aforesaid Regulations provide that the consumers shall ensure the capacity of Solar Rooftop PV System shall not exceed 50% of their existing Contract demand/Sanctioned load.

As per the aforesaid provisions even the Residential consumers who are having lower contract demand/sanctioned load and situated at the far end of the supply system are required to be provided power supply by the distribution licensees by extending mainly LT networks can set-up Solar Rooftop project upto 50% of their Contract

demand/Sanctioned Load. The consumption pattern of Residential consumers varies from season to season and also during the day. The utilization of electricity by the residential consumers is limited to lighting, fan, air-conditioning, heating and for operating the domestic appliances, etc. The utilization of energy by such consumers is a very small fraction of total utilization of energy by all the consumers of the licensees. Moreover, the cost of supply of the distribution licensee to such consumers is quite high in comparison to other categories of consumers. Hence, utilization of energy generated at consumption place by such consumers by setting up of their own Rooftop Solar Power Plant will help the distribution licensee to lower down the losses, reduction in power procurement from the generators and also address the issues of voltage variance etc. The procurement of surplus power if any available from such Rooftop Solar Plants by the distribution licensees at APPC will help in reducing the procurement cost of electricity.

We also note that Government of Gujarat, GUVNL and GEDA have suggested for removal of this restriction of 50% of Contract demand/Sanctioned load on installation of Rooftop Solar Project capacity for Residential consumers and they may be permitted to set up the plant irrespective of their Sanctioned load or Contract demand.

Per contra, Torrent Power Limited has suggested that the maximum limit of Rooftop Solar Project capacity may be kept at the Sanctioned load of the consumers.

We note that the energy generated from Rooftop Solar Power Project setup at the consumer's premises is required to be consumed at the same place and hence, will be beneficial to the licensee as well as the consumers as stated above. As regards, the contentions of the Torrent Power Limited that the consumers will be tempted to install higher capacity of the Rooftop Solar Power Projects than their requirement for their commercial interest, we are of view that most of the consumers are having limitation of space of rooftop at their place. Moreover, the cost of installation of Rooftop Project would also be burdensome to them since the eligibility criteria provides for ownership of the project by the rooftop owner who has to be the consumer of licensee. Further, they are eligible to receive only the APPC price for surplus energy injected into the grid instead of tariff determined by the Commission. The APPC price is quite lower as compared to the tariff being charged to the consumers by the distribution licensee. Thus, it is beneficial for the licensee to earn higher revenue from procurement of such power at lower cost which in turn will reduce the overall power purchase cost of the distribution licensee. Therefore, the contention of TPL is not acceptable and the same is rejected.

In view of above, we decide to make the amendment in Principal Regulation 6.2, first bullet point of Sub-Activity (3) of the Regulation 7 and Clause 1.3 of Annexure-IV of

the Principal Regulations namely Gujarat Electricity Regulatory Commission (Net Metering Rooftop Solar PV Grid Interactive Systems) Regulations 2016 as under:

Regulation 6.2 of the Principal Regulations:

The first para of Regulation 6.2 shall stand amended as under:

The maximum Rooftop Solar PV System capacity to be installed at any Eligible Consumer's premises except Residential Consumers shall be upto a maximum of 50% of consumer's sanctioned load/contract demand; whereas in case of Residential Consumers, the Rooftop Solar PV System capacity shall be irrespective of their sanctioned load/contract demand.

Regulation 7 of the Principal Regulations:

First bullet point of Sub Activity (3) of Regulation 7 regarding the capacity of the Solar Rooftop plant to be installed at Consumer's premises stands amended as under:-

Sr. No.	Activity	Sub Activity	Duration in day(s)
3.	Application to Distribution Licensee	Applicant shall submit application in the prescribed format along with following compliance and documents to Distribution Licensee <ul style="list-style-type: none"> • Capacity of Solar Rooftop to be installed (Subject to Regulation 6.2) 	

Clause 1.3 of Annexure IV

Clause 1.3 of Annexure – IV, Inter connection Agreement between Distribution Licensee and Solar Roof top PV project owner, Net Metering Inter Connection Agreement of the Principal Regulations shall be amended as under:

Consumer other than Residential Consumer shall ensure capacity of Rooftop Solar not to exceed 50% of his contract load/demand/sanctioned load during initial 2 years of the connectivity agreement; whereas in case of Residential Consumers, the Rooftop Solar PV System capacity shall be irrespective of their sanctioned load/contract demand.

2. Regulation 7 of the Principal Regulations

2.1. Objections raised by the Objectors:

Gujarat Energy Development Agency submitted that Authorities at GoG level have desired that the present time line for registration of Solar Rooftop project and release of connection be not more than 30 days and in this regard online portal for registration and processing of application is at advance stage. At Sr.7 of Regulation 7, Signing of Connectivity Agreement and issuance of letter to applicant for completion of project work, in the online portal, the consumer is

required to give undertaking about acceptance of terms and conditions of Connectivity Agreement, State Policy, GRs and GERC Regulations/Notification in force and as amended from time to time. Hence, separate execution of Agreement between licensee and Residential Rooftop Solar consumers would not be required and it may be modified as *“For online applications a separate Execution of the Agreement between Distribution Licensee and Residential Solar PV Rooftop Consumers is waived off.”*

GEDA further submitted that as per the discussion during the meeting held on 25.05.2017 under the Chairmanship of Hon’ble Minister for Energy and Agriculture, it was decided that the date of installation of bi-directional meter should be considered as date of commissioning of Solar Rooftop project at consumers’ place and such consumers should get its benefit from that day. It was decided to waive off inspection by GEDA after installation of bi-directional meter by distribution licensee as the system is inspected by the Chief Electrical Inspector for its safety and also by the distribution licensee before installation of bi-directional meter. Hence, it is suggested to incorporate following in Regulation 7: *“The inspection of Electrical Inspector & installation of bi-directional meter by Distribution Licensee, be deemed as Commissioning of the Residential Solar*

Rooftop System and GEDA visit and issuance of Commissioning Certificate is waived off.”

GUVNL has submitted that as per Regulation 5, the cumulative capacity to be allowed at a particular Distribution Transformer is restricted to 65 % of peak capacity, whereas Regulation 7 of the existing Regulations, notes that the Solar installation to be restricted up to T/C capacity and if required, it is to be strengthened at the cost of Solar Rooftop Generator. This needs to be corrected. Also, clarification with regard to Peak Capacity as it should be Peak Demand recorded on the distribution transformer is required.

Chief Electrical Inspector has submitted that Sub-activity 5 of Activity 11 listed under Regulation 7 provides that installation of proper protection system (Anti-Islanding feature) along with second line of protection such as no volt relay should be provided. Since it is technically harmless to allow grid connected Rooftop Solar PV System having anti-islanding facility without a second line of protection such as NVR, this Inspectorate had been approving RSPV without NVR since long and the same is still continued for systems of capacity up to 10 kW for stated reasons. Hence, it is suggested to delete the words *“along with second line of protection such as no volt relay”* from sub-activity 5 of Activity 11 listed under Regulation 7.

2.2. **Analysis and Decision of Commission:**

The aforesaid objections and suggestions of the objectors are beyond the scope of the amendment proposed by the Commission in the Principal Regulations. If these objections/suggestions are considered at this juncture, the other stakeholders will not get an opportunity to offer their views on such amendments proposed by the aforesaid objectors, which is not permissible. Therefore, we decide not to consider these suggestions being beyond the scope of the present proposed amendment. Hence, the same is not acceptable and therefore, rejected.

3. **Regulation 8.1 of the Principal Regulations**

3.1. **Objections raised by the Objectors:**

Gujarat Energy Development Agency (GEDA) has raised the objection that under Regulation 8.1 of Regulations, a variation of +/- 5% of rated capacity is allowed. Therefore, for 1 kW, 950 Watt to 1050 Watt capacity is permissible. Similarly, for 1 MW the solar power plant of 950 kW and 1050 kW is permissible. Regulation 6.2 provides that the capacity of solar rooftop project shall be within the range of 1 kW to 1 MW. Some of the consumers informed that due to variance in Solar PV Panel Capacity, if the Solar PV Power Plants set up with capacity of 950 Watt or 1050 Watt in the Residential consumers' premises or industrial consumers'

premises, these are not accepted by the distribution licensees. Hence, it is suggested to add *“the grid connected Solar PV rooftop system with minimum 950 watts capacity and system capacity upto 1050 watts capacity may be deemed to be of minimum of 1 kW capacity.”*

3.2. **Analysis and Decision of Commission:**

Regulation 8.1 pertains to interconnection with grid “Standard and Safety”.

The aforesaid Regulation provides for interconnection of the Solar Rooftop plant with the grid to be carried out as per the CEA Regulations as well as GERC Open Access Regulations, 2011. Moreover, the first proviso to the said Regulation provides that the variance in the Solar Rooftop Power System within the range of 5% shall be allowed. The aforesaid provision has been made to the Regulations looking to the availability of various size of solar panels in the market, having capacity of 250/310/315/320 watt. In such case, it may not be always possible to achieve the minimum plant size of 1 kW or 1 MW as specified in first proviso to Regulation 6.2 and there may be some variance in the capacity of the plant. Therefore, the Commission has considered the size variance of the solar panel and accordingly provided the tolerance of +/- 5% in the rated capacity of the system. Whenever any case arises with regard to the capacity of plant set up by the consumers and connectivity of such plant with grid, in that case harmonious

interpretation of the Regulations needs to be made so that the provisions of the Regulation 6.2 and 8.1 can be given effect.

We also clarify that as the draft amendment does not propose any amendment in Regulation 8.1 of the Principal Regulations, we are of view that it is incorrect to decide any amendment sought by the GEDA as the same is beyond the scope of the present amendment proposed by the Commission. Hence, the request of GEDA to amend the Regulation 8.1 is not accepted and the same is rejected.

4. **Clause 1.3 of Annexure – IV of the Principal Regulations**

4.1. **Objections raised by the Objectors:**

Gujarat Urja Vikas Nigam Limited and Torrent Power Limited have submitted that consumers other than Residential consumers are required to ensure capacity of Rooftop Solar PV System does not exceed 50 % of their Contract load/demand/Sanctioned load during initial 2 years of the Inter Connection Agreement. This condition is required to be modified and made applicable for the entire tenure of Inter Connection Agreement. Hence, it may be specified that the consumer, other than Residential consumer, shall maintain the Sanctioned load/Contract Demand twice the Rooftop Solar System's capacity during the tenure of the agreement with licensee.

As per the provision of Clause 1.3 of Annexure IV (Connectivity Agreement), the capacity ceiling norms for other than residential consumers shall not be applicable after 2 years of Connectivity Agreement and other than residential consumers can also install Rooftop Solar PV System capacity irrespective of their sanctioned load.

If the ceiling norm is removed after 2 years, the implication will be (i) either consumer will set up Rooftop Solar PV System capacity to the extent of meeting entire requirement, or (ii) will reduce sanctioned load to the extent of solar capacity. In both the events, there will be financial implication on licensees even though licensees have to keep all the arrangement in place to ensure power supply to the consumer when there is no solar generation. The implication will be on the tariff of other lower paying capacity consumers. Also, after 2 years, the consumer may install excess capacity and Discoms have to purchase such excess energy at APPC, whereas solar power would be available at cheaper rates than APPC. Hence, wording “..during initial 2 years..” may be removed.

4.2. **Analysis and Decision of Commission:**

The objection raised by the objectors is with regard to amending the Clause 1.3 of Annexure –IV of the Principal Regulations which provides that the consumer other than Residential Consumer shall ensure capacity of Rooftop Solar not to

exceed 50% of the Contract load/demand/Sanctioned load “*during initial 2 years of the connectivity agreement*” by “*during the entire tenure of connectivity agreement*”. The aforesaid suggestion is beyond the scope of amendment proposed by the Commission. Further, as other stakeholders did not get an opportunity to comment on such suggestion, they need to be given such an opportunity. Hence, the suggestion is not acceptable at this juncture and the same is rejected.

5. **Regulation 9 of the Principal Regulations**

5.1. **Objections raised by the Objectors:**

It is brought to the notice of GEDA that upon commissioning of the system, RSPV consumers are receiving credits in their bill for the excess electricity injected after adjustment of consumption at the APPC rate. Since in the draft Regulation the limit of 50 % sanctioned load/contract demand is proposed to be removed, there could be such consumers who may get regular credit in the bill for the excess injected energy at APPC rate which need to be settled once in a Financial Year. Hence, it is suggested that,

“ ..the excess injected electricity after adjustment of consumption, purchased by the concerned Distribution Licensee at the APPC rate, shall be settled during the

end of each financial year and such Consumer's credit shall be paid by the Distribution Licensee."

5.2. **Analysis and Decision of Commission:**

The aforesaid objection and suggestion is beyond the scope of the amendment proposed by the Commission in the Principal Regulations. All the stakeholders are required to be given an opportunity to offer their views on the suggestion made by the Objector. Hence, if the aforesaid suggestion is considered, it would be without affording the other stakeholders an opportunity of giving their views which is not legal and permissible. Therefore, we decide that the suggestion is not acceptable and the same is rejected.

6. **Regulation 11.1 and Clause 7 (A) (ii) & 7 (B) of Annexure- IV of the Principal Regulations**

6.1. **Objections raised by the Objectors:**

Torrent Power Limited has submitted that there is inconsistency between Regulation 11.1 and Clause 7 (A) (ii) & 7 (B) (ii) of Annexure IV – i.e. Interconnection Agreement. As per Gujarat Solar Policy, 2015 utilization of energy generated by Rooftop Solar PV System installed by Residential/Govt. buildings and Industrial /commercial consumers who are not obligated entity,

shall be considered for meeting the RPO of licensee. Therefore, it is necessary to consider entire solar generation from such Rooftop Solar PV System for meeting RPO of the licensee and not just surplus purchased. Hence, Clause 7 (A) (ii) & 7 (B) (ii) of Annexure IV need to amended suitably.

GUVNL has also submitted that Regulation 11.1 provides that the quantum of electricity consumed by the Eligible Consumer, who is not defined as an obligated entity, from the Rooftop Solar PV System under net-metering arrangement shall qualify towards RPO compliance of the licensee, whereas Clause 7 (A) and (B) of the Inter-Connection Agreement provide that in case of eligible consumer who is not defined as an obligated entity, purchase of surplus energy is only allowed to meet RPO of the licensee. It needs rectification in line with policy wherein in case of Rooftop Solar PV System setup by Residential, GoG Building, Industrial, Commercial and Other consumers who are not obligated entity, the entire quantum of electricity generated from such Rooftop Solar PV System is to be utilized for RPO of the licensee.

6.2. **Analysis and Decision of Commission:**

The aforesaid objection and suggestion of the objectors is beyond the scope of the amendment proposed by the Commission in the Principal Regulations. All the stakeholders are required to be given an opportunity to offer their views on the

suggestion made by the Objectors. Hence, if the aforesaid suggestion is considered, it would be without affording the other stakeholders an opportunity of giving their views which is not legal and permissible. Therefore, we decide that the suggestion is not acceptable and the same is rejected.

7. Regulation 9.4, 9.5 and Clause 7 (B) of Annexure-IV of the Principal Regulations

7.1. Objections raised by the Objectors:

GUVNL has submitted that there is a contradiction between Regulation 9.4 & 9.5 and Clause 7 (B) (b) Type 2(a) and Type 2(b) of Interconnection Agreement dealing with energy accounting for industrial, commercial & Other consumers utilizing 'Renewable attributes' & registered under REC mechanism respectively. Regulation 9.4 & 9.5 are required to be modified in line with Inter Connection Agreement and Solar Power Policy, 2015, accordingly energy accounting for such consumers needs to be undertaken on 15- minute basis.

7.2. Analysis and Decision of Commission:

The aforesaid objection and suggestion is beyond the scope of the amendment proposed by the Commission in the Principal Regulations. All the stakeholders are required to be given an opportunity to offer their views on the suggestion made by the Objector. Hence, if the aforesaid suggestion is considered, it would be

without affording the other stakeholders an opportunity of giving their views which is not legal and permissible. Therefore, we decide that the suggestion is not acceptable and the same is rejected.

8. **Regulation 13.5 and Annexure –VI of the Principal Regulations**

8.1. **Objections raised by the Objectors:**

GUVNL has submitted that Regulation 13.5 provides the main Solar Meter of 0.2S class accuracy whereas Annex VI stipulates as 1.0/0.5S. This needs rectification. Also solar meter specification up to 50 kW system only is provided in Annex. VI, but specifications for capacity above 50 kW also need to be specified.

8.2. **Analysis and Decision of Commission:**

The aforesaid objection and suggestion of the objector is beyond the scope of the amendment proposed by the Commission in the Principal Regulations. All the stakeholders are required to be given an opportunity to offer their views on the suggestion made by the Objector. Hence, if the aforesaid suggestion is considered, it would be without affording the other stakeholders an opportunity of giving their views which is not legal and permissible. Therefore, we decide that the suggestion is not acceptable and the same is rejected.

9. **General Comments**

9.1. **Objections raised by the Objectors:**

Gondal Chamber of Commerce and Industry has suggested (i) Yearly accounting of units and unit charges after set-off of the energy generated and supplied and consumed by the consumers, (ii) Rooftop Solar PV System consumers should not be charged on slab rate basis.

Amplus Energy Solutions Private Limited has submitted that other states like Maharashtra, Rajasthan, Uttar Pradesh, Haryana, Delhi, Andhra Pradesh, Telangana and others have allowed the third-party ownership model to participate in the net metering. This has enabled them in ramping up their solar rooftop capacities.

Distributed Solar Power Association has submitted that the Regulations do not create any differentiation between roof-top based solar plants established under the ownership and third party model and that rooftop based plants may be established under the third party model on net-metering basis. In the alternative, the Commission may consider appropriate amendments to the Regulations to clarify the position in this behalf.

It is further submitted to provide exemption from (a) transmission charges and wheeling charges, and (b) Cross subsidy surcharge and the additional surcharge,

in respect of power generated under the rooftop based solar plants under the third party model.

9.2. **Analysis and Decision of Commission:**

The aforesaid objections and suggestions of the objectors are beyond the scope of the amendment proposed by the Commission in the Principal Regulations. All the stakeholders are required to be given an opportunity to offer their views on the suggestion made by the Objectors. Hence, if the aforesaid suggestions are considered, it would be without affording the other stakeholders an opportunity of giving their views which is not legal and permissible. Therefore, we decide that the suggestion is not acceptable and the same is rejected.

Sd/-
[P.J.THAKKAR]
MEMBER

Sd/-
[K.M.SHRINGARPURE]
MEMBER

Sd/-
[ANAND KUMAR]
CHAIRMAN

Place: Gandhinagar
Date: 6/10/2017.

Annexure – I

Sr. No.	Name of the objectors/stakeholders
1	Gujarat Energy Development Agency
2	Energy & Petrochemicals Department, Govt. of Gujarat
3	Torrent Power Limited
4	Chief Electrical Inspector
5	Gujarat Urja Vikas Nigam Limited
6	Amplus Energy Solutions Private Limited
7	Distribution Solar Power Association

Annexure – II

Sr. No.	Name of the objectors/stakeholders
1	Gujarat Energy Development Agency
2	Torrent Power Limited
3	Gujarat Urja Vikas Nigam Limited