

## Notes for Public hearing, TGERC, 17/04/2025

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### Introduction

Not really an objector, supporter for better implementation of this DRE solar. Wish DISCOMs had proposed this idea years ago.

- 1<sup>st</sup> SAC meeting, 4/3/2015: Agri solar, solarisation of feeder
- 2<sup>nd</sup> SAC meeting 17/3/2016: same, Published a booklet on solar feeder idea in TG/AP, presentations in AP, TG, Mh, RJ etc
- Jun 2017: MSKVY, Maharashtra launched, 2-10 MW plants within 5 km of s/s, 2024 MSKVY-2
- March 2019: KUSUM launched, A, B,C, the current scheme ending on 31/3/2026

TG has delayed on this. Mistakes happen, but should not be repeated. Hasty capacity addition plans, without ensuring that plans will result in the expected benefits. (Success does not consist in never making mistakes, but in never making the same one a second time – GBS).

How can this be implemented better? Only 4 objectors. No SHG or farmer representatives. Awareness building for better participation of stakeholders at this early stage needed.

### Issues raised, DISCOMs' responses, our comments

1. Substation infrastructure strengthening to ensure quality and availability of grid supply: DISCOMs' replies that this will be considered and addressed. Ideally DISCOMs should commit voltage within limits and specify grid availability (say > 95 or 98% in a year). Barring exceptions such as SLDC directives, DISCOMs should compensate if these criteria are not met. SPG cannot sell in open access as per PPA. DISCOMs should plan for this investment. MSKVY had provided upto Rs 25 lakh per s/s for infrastructure strengthening, suggested prioritisation of s/s with additional 11 kV bay/ land for bay.
2. Substation spare capacity calculation: DISCOMs' calculation of solar capacity is currently independent of substation loading. Solar capacity should not exceed the average load of the substation, so that there would not be reverse flow, since that would defeat the very purpose of DREs. DISCOMs have replied that this will be considered and addressed. They could clarify how this is being addressed, in all the substations where solar plants are proposed. There may be instances where an existing solar plant is already connected at 33 kV level. This also needs to be considered.

3. Tight implementation time line of 8 months: DISCOMs reply that this is to meet KUSUM scheme deadline of March 2026. DISCOMs reply also mentions the MNRE plan for KUSUM 2. This is also supported by the fifth report on demand for grants for MNRE for FY26, by the standing committee on energy (March 2025). If this is indeed the case, why shorten the schedule to unrealistic time frames?
4. Phased implementation of KUSUM and sanctioned KUSUM capacity: DISCOMs agree that the MNRE sanctioned capacity is 1000 MW, but says that efforts are being made to revert to 4000 MW and also get sanction for KUSUM C. With the available sanction of 1000 MW, we feel that there is a stronger case for a phased implementation of KUSUM. This could be a mix of KUSUM A and C (feeder). DISCOMs could comment on this and also inform about their proposal for KUSUM C. DISCOMs should also present a comparative analysis between KUSUM A and C options for TG state – in terms of cost/benefits to farmers, SHGs, DISCOMs, and state government. Such calculations should use realistic numbers relevant to the location. (For example, use of average market price in Additional info 1 is not correct – average day time market price should be used). They should specify availability of land parcels near the substations to facilitate the implementation. (MSKVY land lease 1.25 l/ha, 3% escalation)
5. Reduction of PBG to Rs: 1 lakh/MW: DISCOMs have replied that they are already taking this up with government support and will be implemented after Hon'ble TGERC approval: We hope this happens soon.
6. Tariff: Hon'ble TGERC could consider revising the benchmark tariff for KUSUM A from Rs 3.13/Unit, determined in 2021. DISCOMs to clarify if F& S regulations would apply to these plants. Clause 4.3.4 c of the model PPA appears to suggest this. If so, generator or DISCOMs (at a fee) could ensure that these regulations are complied with.
7. KUSUM Implementation plan for Telangana: DISCOMs/TGREDCO should prepare a detailed document to address all issues related to implementation. An example is the document prepared for [MSKVY 2.0](#), by Maharashtra government. This has points such as improving substation infrastructure, offering high lease rent, benefit grant to Panchayat etc.
8. PPA clauses on generation compensation due to off take constraints due to grid unavailability: Draft PPA provided by DISCOMs does not have clause 4.9 given in the model PPA in [KUSUM guidelines](#). 4.9.1 and 4.9.2 give the details. DISCOMs to clarify why this clause is deleted and what is its plan for compensation.
9. Review of power purchase plan: DISCOMs have not replied to this comment. We request Hon'ble TGERC to take up amendments to the resource plan, considering the many developments that have happened after the order of December 2023.

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