



July 27th, 2019

GCCI/DYSGR/ENR/2019-20/7796

Shri Saurabhbhai Patel,
Hon'ble Energy Minister
Govt. of Gujarat
Gandhinagar.

Durgesh V. Buch
President

Natubhai Patel
Sr. Vice President

Bhargav Thakkar
Vice President

Sanjeev Chhajer
Secretary

Dilip M. Padhya
Secretary (R)

Pathik S. Patwari
Treasurer

Subject: Inability of Local manufacturers of Solar Photovoltaic Systems to participate in tenders due to restrictive guidelines of MNRE

Reference: PGVCL/DSM/EOI/SRT/2019-20/01 DT: 20/07/2019

Respective Sir,

Greetings from Gujarat Chamber of Commerce and Industry.

We request your kind intervention in the above-mentioned serious matter, in the interest of Gujarat based Manufacturing & EPC Industry.

Sir, recently a tender for empanelment of agencies for design, supply, installation, testing and commissioning of grid connected Rooftop SPV in residential premises aggregating to 600 MW has been published by PGCCL "Paschim Gujarat Vij Company Ltd".

In the tender it is mentioned that the bidder needs to use DCR modules in the project which means that the solar modules which are produced in India should be manufactured from those Solar Cells which should also have been manufactured in India. It is mentioned that this requirement is as per MNRE's guidelines. A copy of the relevant section of the tender is attached herewith for your kind perusal.

Sir, as you will be kindly aware, at present the availability of domestically manufactured Solar Cells in our country is very less and therefore the local manufacturers of SPV systems will not be able to provide the Solar Cells required to manufacture the modules that can fulfil the 600 MW capacity of this tender, for which the deadline is 31st March 2020.

At present Indian Solar Cell manufacturers' production capacity is less than the demand and therefore most of the solar cell suppliers refuse to supply cells to the small manufacturers of solar panel whose capacity is under 100MW/Annum. In addition, since their production capacity is lower than the demand, they supply the cells only to their pre-determined buyers at very high rates.



Sir, we believe that the guidelines of MNRE are aimed only at supporting Make-In-India. However, the criteria do not solve the objective but is having a rather contrary effect as the local manufactures are unable to apply to tenders due to the low manufacturing capacity of solar cells in our country.

In the present conditions if MNRE insists to use the DCR cells then the project will be delayed by years because of shortage of DCR cells; also the price the system will exceed the MNRE benchmark price by a huge difference.

Our humble request in this matter is to please start DCR scheme gradually by keeping initial requirement of 5% DCR for this 600MW Project. We request your kind intervention to suggest MNRE to amend the "DCR" clause and permit use of "Made in India" Modules having requisite BIS & IEC certification by using Imported Cells for the remaining percentage. Thereafter MNRE can increase gradually in a phased manner. We also request that such phased requirements should be kept for other tenders in future as well.

On behalf of our members and associations including the Federation of Solar Manufacturers & Intermediaries (FEDSMI), we request you to kindly consider the matter positively to make necessary recommendations to MNRE and oblige.

Thanking you in anticipation,

With Regards,

Sincerely,

Durgesh Buch
President

Encl. as above

Copy to:

1. Shri R.K. Singh, Hon'ble Minister for New and Renewable Energy, Block No. 14, C.G.O. Complex, New Delhi.
2. Shri Armane Giridhar, IAS, Addl. Secretary, New and Renewable Energy, Prime Minister's Office, New Delhi.

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TECHNICAL SPECIFICATIONS FOR GRID CONNECTED SPV SYSTEMS

The specifications of SPV systems, for which EOI are invited, are as under. The self certified Test Report(s) of each of the components/ systems mentioned shall be submitted before starting System installation. To ensure optimum performance of the solar installation and its related safety aspects, the provisions of the publication of GERMI on "Best Practices in Operation and Maintenance of Roof Top Solar PV systems in India" published in May, 2018 be followed.

The proposed projects shall be commissioned as per the technical specifications given below. Any short comings will lead to cancelation of Empanelment as may be decided by -DISCOMs. The specifications, in the GERC Regulation on Net Metering shall also be applicable.

1. DEFINITION:

A Grid Tied Solar Rooftop Photo Voltaic (SPV) power plant consists of SPV array, Module Mounting Structure, Power Conditioning Unit (PCU) consisting of Maximum Power Point Tracker (MPPT), Inverter, and Controls & Protections, interconnect cables, solar meter, bi-directional energy meter and switches. PV Array is mounted on a suitable structure. Grid tied SPV system is without battery and should be designed with necessary features to supplement the grid power during daytime. Components and parts used in the SPV power plants including the PV modules, metallic structures, cables, junction box, switches, PCUs etc., should confirm to the BIS, IEC, or international specifications, wherever such specifications are available and applicable.

Solar PV system shall consist of following equipment/components.

- Solar PV modules consisting of required number of Crystalline PV modules.
- Grid interactive Power Conditioning Unit with Remote Monitoring System.
- Mounting structures.
- Junction Boxes.
- Earthing and lightening protections.
- IR/UV protected PVC Cables, pipes and accessories.
- Solar Meter and Bi-directional Energy Meter

a. SOLAR PHOTOVOLTAIC MODULES:

1.1.1 The PV modules and Solar Cell used should be made in India. Necessary documents in this regards must be provided to DISCOM.

Violation of norms of Domestic Content Requirement (DCR) UNDER Solar PV projects will lead to penalties and actions as mentioned in office memorandum of MNRE GOI vide letter no. 283/2018-GRID SOLAR dated 20th February, 2018 as under:

- a) Filing of criminal case under IPC 420 and related Sec.
- b) Blacklisting of developers for period of 10 years
- c) Forfeiting of relevant bank guarantee(s)
- d) Disciplinary case against the Officers of concerned CPSU/ State Govt.
- e) Any other action, in addition to those above

SPV Modules and Solar Cells must be used for this Scheme shall be domestically manufactured as per MNRE's requirement. The Empanelled Agencies shall require to submit the Self declaration, regarding the Modules and Solar cells used under the Scheme are "Made in India", from the concerned manufacturer of Solar Modules, supplied for this scheme of GoG/GOI, before commissioning of the System. Violation of this condition will be reported to the MNRE and GoG for taking actions against the Manufacturer of the Solar Modules and Empanelled Agency. Such firm and Empanelled Agency may be put under the black list or stop deal list as may be decided by the DISCOM Authority.

In absence of the ALMM, the Empanelled Agencies shall have to submit self-declaration regarding domestically manufactured Cell and Modules used in the SPV System in this project. Whenever, the ALMM list published by the MNRE, the Model and Manufactures of the Module and Cell shall be from the ALMM only used in the SPV System in this project.

"The PV modules used shall conform to the latest edition of IEC 61215 and IS 14286 (Terrestrial photovoltaic (PV) modules - Design qualification and type approval). The PV modules shall also conform to IS/ IEC 61730 (Photovoltaic (PV) module safety qualification: Requirements for construction and testing)."

1.1.2. The PV modules used must qualify to the latest edition of IEC PV module qualification test or equivalent BIS standards Crystalline Silicon Solar Cell Modules IEC 61215 and IS14286, IEC 61853-Part I, IS 16170-Part I for Photovoltaic (PV) module performance testing and energy rating, Irradiance and temperature performance measurements, and power rating, In addition, the modules must conform to IEC61730 Part-2- requirements for construction & Part 2 – requirements for testing, for safety qualification or equivalent IS.

- a) For the PV modules to be used in a highly corrosive atmosphere throughout their lifetime, they must qualify to IEC 61701/IS 61701

Sign & Round Seal of the EOI applicant

Date and place

(Page 65 of 108)