



Renewable Energy Association of Rajasthan (REAR®)

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Ref: - RREA/2021/0104

30th April 2024

To,
Shri. Divyanshu Jha, (Dy. Secretary)
Ministry of New & Renewable Energy,
New Delhi

Subject: - Comments/suggestions on draft guidelines for PM Surya Ghar Yojna.

Respected Sir,

We appreciate your intent to seek feedback on the draft policy on PM Surya Ghar Yojana. While we commend many aspects outlined in the draft, we believe certain policy guidelines may not be favorable to vendors, who are integral to the success of this initiative. Imposing capacity limits by indexed Performance Bank Guarantees of huge amounts could potentially hinder the efforts of small and medium-sized vendors, who play a pivotal role in driving the implementation of this policy forward.

It's concerning that despite vendors being the driving force behind the policy's success, there appears to be a lack of recognition and support for their contributions. Unlike consumers who benefit from financial incentives and discoms who receive service charges, vendors seem to face additional challenges without corresponding incentives. This disparity becomes more apparent when considering the financial strains vendors already endure, such as bank loans and delayed payments from customers.

Furthermore, the requirement for vendors to provide warranty on behalf of manufacturers, coupled with financial burdens and pricing constraints that fail to cover installation costs, exacerbates the challenges faced by vendors. Additionally, the absence of operational support from MNRE only adds to the burden.

Moreover, the functionality issues with the portal for last 1 month raise doubts about the feasibility of achieving the targets set by MNRE. It's essential for MNRE to address these concerns and ensure that the necessary support and incentives are provided to vendors to facilitate the smooth and successful implementation of the policy.

Presently, when applying for loans via the Jan Samarth Portal, only a limited number of major corporations are listed as empaneled vendors. It's crucial to ensure that beneficiaries can access loans from Nationalized banks through all vendors, rather than just a privileged few. At present, Nationalized banks have established partnerships with only a handful of prominent vendors, leaving others uninformed about the process of facilitating loan facilities for beneficiaries.

Please find below some suggestions and comments on certain points, which we believe will contribute significantly to achieving the desired outcomes.

S. No.	Page No./Clause No./Para No with the description of the item	Comments	Remarks/Justification
1	Pg 3 Point 4 (e) – “In order to ensure that the customers are not overcharged, the Ministry of New and Renewable Energy will publish benchmark prices of solar modules, inverters, and other important equipment on the portal every year”.	For effective regulation, MNRE should consider issuing benchmark prices on a monthly basis, or at most, quarterly. Additionally, these benchmarks, which pertain to solar modules and inverters, should apply equally to manufacturers.	Given the inherent volatility in the solar equipment market, particularly with modules, where prices fluctuate frequently, setting annual benchmarks is not advisable. Moreover, since project costs are contingent upon equipment prices, it's commendable that MNRE will disclose the prices of solar modules and inverters. However, it's essential to carefully consider the frequency of these publications, ensuring they occur at most quarterly to reflect market dynamics accurately.
2	Page 1/Para 1a “ The scheme has an outlay of Rs 75,021 crore and is to be implemented till FY 2026-27.” and Page 12/ Para 8i “The receiving of applications on the National Portal shall be limited to 1 crore active applications and only these applications shall be considered for release of CFA. “	The scheme should remain accessible until March 31, 2027, with provisions for additional CFA in case the program surpasses budgetary allocations and the portal homepage should prominently display the current count of active applications for enhanced	Vendors invest significantly in establishing a comprehensive business ecosystem for subsidy programs. Assured program timelines enable them to offer long-term employment and services. The fear of sudden program closures often serves as a deterrent. Displaying the application details will not only motivate vendors but also encourage beneficiaries to expedite the deployment of rooftop solar systems.

		transparency and accessibility.	
3	Page 12/ Clause 9a “ Vendors shall be registered based on submission of the following documents” And Page 39/ Annexure 5 “	For empanelment, the annexure lacks any mention of prior experience in solar installation or services. It's imperative that new empanelment require a demonstrated history of solar experience, along with some financial and technical qualifications.	At present, after the launch of the PM Surya Ghar Yojana, individuals without prior solar experience securing empanelment solely based on their GST number. These individuals often engage in solar business as a secondary source of income, lacking the infrastructure for installations and services. They frequently hire unqualified and unskilled labor on an ad-hoc basis for installations. This surge in such vendors has created a network where they act as intermediaries, commissioning others to undertake solar installations under their empanelment. This unsustainable cycle must be halted immediately through the implementation of stringent eligibility criteria for empanelment. Such part-time businesses may abruptly cease operations, leaving customers stranded without services.
4	Pg 13 Point 9 (c) – “Once the vendors have installed a significant capacity through the National Portal, the bank guarantee requirement will be indexed to the capacity as follows:	Imposing such a substantial additional Performance Bank Guarantee (PBG) could deter vendors from expanding their capacities and	Why is MNRE considering restricting vendors based on installed capacity? Following installation, Discoms conduct inspections before disbursing CFA. Moreover, the equipment used meets MNRE standards with certifications like ALMM, BIS,



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We, hope you find our comments/suggestions in line with the policy requirements.

For **Renewable Energy Association of Rajasthan (REAR)**