

Renewable Energy Association of Rajasthan(REAR®)

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28th June 2025

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President

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Vipin Bansal
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To

The Secretary,
Ministry of New and Renewable Energy (MNRE)
Atal Akshay Urja Bhawan
Block-14, CGO Complex, Lodhi Road
New Delhi - 110003

Subject: Request for Issuance of Standard Operating Procedure (SOP) for Uniform Implementation of ALMM-II

Respected Sir,

At the outset, we extend our wholehearted support to the Hon'ble Prime Minister's vision of "**Make in India**" and "**Atmanirbhar Bharat.**" We firmly believe that ALMM-II is a significant step towards strengthening India's domestic solar manufacturing ecosystem and reducing dependence on imports. We also sincerely appreciate **MNRE Order No. 283/63/2025-GRID SOLAR dated 25.05.2026** and the subsequent clarifications, wherein provision has been made to consider case-to-case relief for affected projects. This has helped safeguard investments and provided much-needed confidence to the industry.

However, while the intent of the policy is widely appreciated, its implementation is presently facing significant challenges due to the absence of a detailed **Standard Operating Procedure (SOP)**. Across the country, several DISCOMs, State Nodal Agencies and other approving authorities have either stopped accepting or are delaying applications for **Net Metering, Open Access and other solar projects**, citing lack of clarity on ALMM-II compliance and verification requirements. Consequently, project approvals are getting delayed, investments are being held up, consumers are facing uncertainty, and renewable energy deployment is being adversely affected. The challenge today is not the policy itself, but the absence of a clear and uniform implementation framework.

In view of the above, we respectfully request the Ministry to issue a comprehensive SOP clearly defining the implementation process, compliance requirements, roles and responsibilities of all stakeholders, documentation, verification mechanism and approval procedures so that all implementing agencies across the country follow a uniform approach.

We also request the Ministry to issue a specific clarification regarding **ALMM-II compliant modules**. At present, there is considerable ambiguity in the market regarding which modules qualify under ALMM-II and how compliance should be verified. It is pertinent to note that **every DCR-certified module may not necessarily be ALMM-II compliant**, and therefore DCR certification alone

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should not be treated as the basis for determining compliance. A clear clarification identifying the eligibility criteria, acceptable documents and verification methodology will eliminate confusion and prevent inconsistent interpretation by various agencies.

To strengthen transparency and traceability, REAR proposes the development of a centralized digital platform based on the principle of **"One Nation • One Industry • One Portal."** Every ALMM-II compliant project should be registered on a common portal, enabling digital verification of module details, DCR status, project registration, and commissioning status. Such a platform would greatly simplify compliance for developers, manufacturers, DISCOMs and inspection agencies while ensuring end-to-end traceability.

We further request the Ministry to introduce a **standardized national nomenclature for solar modules serial numbers**, enabling stakeholders to identify critical information such as manufacturer, manufacturing facility, cell origin, technology, manufacturing date and ALMM-II compliance directly from the module serial number. This will significantly improve transparency and simplify field verification.

Further, the SOP should clearly define the accountability of manufacturers, EPC contractors, developers, DISCOMs, State Nodal Agencies and other stakeholders. A well-defined governance framework specifying verification responsibilities, documentation requirements, penalties and dispute resolution mechanisms will ensure uniform implementation and reduce interpretation-related disputes.

The industry is also witnessing supply constraints and price volatility following the implementation of ALMM-II. We therefore request MNRE to monitor domestic availability of modules and cells, maintain visibility of the supply chain, discourage profiteering, stocking and black marketing, and explore suitable market stabilization measures until domestic manufacturing capacities mature. Such interventions will help maintain healthy competition and protect consumer interests during the transition period.

We shall be grateful for your kind consideration of the above suggestions and request the Ministry to issue the necessary SOP and implementation guidelines at the earliest.

Thanking You.

Yours sincerely,

For Renewable Energy Association of Rajasthan (REAR)



**Ajay Yadav
(President)**