BEFORE THE HARYANA ELECTRICITY REGULATORY COMMISSION
PANCHKULA, HARYANA

Case No. HERC/P. No. 50 of 2025

Date of Hearing : 25/09/2025
Date of Order : 30/10/2025

IN THE MATTER OF:

Discussion Paper for inviting comment/objections from stakeholders/general public for finalization of Draft 2nd amendment to the Haryana Electricity Regulatory Commission (Rooftop Solar Grid Interactive Systems Based on Net Metering/Gross Metering), Regulations, 2021.

QUORUM

Shri Nand Lal Sharma, Chairman
Shri Mukesh Garg, Member
Shri Shiv Kumar, Member

The following were Present On behalf of the Stake holder/General Public

1. Sh. Rajinder Kumar, CE/UHBVNL
2. Sh. Sanjay Verma, SDO/UHBVNL
3. Sh. G.C.Goyal, Retd. CE/PSPCL

ORDER

1. **Background and Statement of Objects:**

a) The Haryana Electricity Regulatory Commission (HERC) notified the Haryana Electricity Regulatory Commission (Rooftop Solar Grid Interactive Systems Based on Net Metering/Gross Metering), Regulations, 2021 on dated 19.07.2021 and issued 1st Amendment dated 15.07.2024 clarifying that *Monthly Minimum Charges (MMC), shall continue to be related to total consumption of the consumer and not to the net consumption.* HERC in its ARR order for FY 2025-26 abolished the provision of MMC and replaced with fixed charges.

b) The condition to cap generation at 90% of consumption during financial year was introduced in FOR draft Model Regulations, 2013 which was subsequently abolished in its draft Model Regulations, 2019 after introduction of the regulation to buyback the surplus power by Forum of Regulators (FOR). Now, FOR in its draft Model Regulations, 2024 has proposed that the surplus solar electricity generated shall be purchased by the distribution licensee at 75% of the last discovered SECI tariff for solar energy source or reference rate as may be determined by the Commission.

c) The PM Surya Ghar: Muft Bijli Yojana (PMSG:MBY) notified on 29.02.2024 aims to provide free 300 units of electricity to 1 cr. Households (Domestic Prosumers) every month by installing solar panels and providing opportunity to the beneficiaries to earn in lieu of surplus electricity generated. Many other SERCs have already aligned Regulations with above national policy.

d) It became imperative to revisit the existing regulations in view of the above developments, so as to make the same compatible with these changes. As such draft 2nd Amendment to HERC (Rooftop Solar Grid Interactive Systems Based on Net Metering/Gross Metering), Regulations, 2021 has been prepared.

e) A draft discussion paper for inviting comments/objections from stake holders/general public for finalization of 2nd amendment to the HERC (Rooftop Solar Grid Interactive Systems Based on Net Metering/Gross Metering) Regulations 2021, was published and hosted on Commission's website on 10.07.2025 for seeking comments of the stakeholders/intervenors up to 14.08.2025.

2. **Proceeding:**

2.1 In response to the ibid public notice, the following stakeholders filed their written objections / comments / suggestions:

I. Uttar Haryana Bijli Vitran Nigam Limited (UHBVNL).
II. Sh. Ashok Lavasa, 3696, Sector-23, Gurgaon.
III. Er. Gian Chand Goyal, Retd. CE, PSPCL, Panchkula.
IV. Citizen's Welfare Association (Regd.) Panchkula.
V. Haryana Rice Exporter's Association.
VI. Haryana Chamber of Commerce & Industries (Regd.).
VII. Powerxchange Innovations Pvt Ltd.

2.2 A public hearing was held on 20.08.2025 wherein the following representatives of the stakeholders/general public were present

I. Sh. Deepak Popli, CE/Commercial, UHBVNL, Panchkula.
II. Sh. Punit Kundu, SE/RA, UHBVNL, Panchkula.
III. Sh. Gian Chand Goyal Retd. CE, PSPCL, Panchkula.
IV. Sh. R. C. Goyal, Panchkula.
V. Sh. S. K. Nayar, President, Citizen Welfare Association Panchkula.
VI. Sh. Narender Sharma, representative of Citizen Welfare Association Panchkula.
VII. Sh. Vikram Hans, representative of Haryana Rice Exporters Association (HREA) and Haryana Chamber of Commerce & Industry (HCCI), Karnal.

2.3 The Commission vide its interim order dated 26.08.2025 held as under;

i. Sh. Gian Chand Goyal Retd CE, PSPCL submitted that the surplus electricity units may be compensated in full at APPC (Average Power Purchase Cost) without any cap in place of 75% cap of the last discovered SECI tariff. Further, submitted that the prosumer may be given an option to receive payment of the net credited balance, if any, or have such credited balance units be carried over to the next settlement period.

ii. Sh Vikram Hans, representative of Haryana Chamber of Commerce & Industry submitted that the compensation for unsettled units at the end of settlement period may be considered at rate of APPC or Gross Metering rates and option may be given to prosumers for carry forward such units *to next settlement period. Further, submitted that restriction of net metering up to 500 kWp may be increased up to 1MW or more on the pattern of neighboring States like Punjab and Himachal and net billing regulations may be incorporated for large industries.*

iii. *Sh. Deepak Popli, CE/Commercial, UHBVNL submitted that comment on the draft have been prepared with the consent of DHBVNL and filed in the Commission. He, further, requested for grant of some time to submit their views on the comments of general public/stake holders.*

iv. *The Commission adjourned the matter, UHBVNL on behalf of UHBVNL and DHBVNL to file their views on the comments of general public/stake holders.*

2.4 The case was heard on 25.09.2025. UHBVNL on behalf of UHBVNL and DHBVNL submitted their views on the comments of general public/stake holders.

The Commission, while giving a final shape to the HERC 2nd amendment to the HERC (Rooftop Solar Grid Interactive Systems Based on Net Metering/Gross Metering), Regulations, 2021 has considered the written objections / comments / suggestions filed by the interveners as well as oral submissions made in the hearing held on 20.08.2025 and 25.09.2025.

The main objections of the interveners and the Commission's view / decision on the same are being discussed in the following paragraphs. The comments / suggestions or rewording of certain regulation(s), addition deletion of words, inadvertent / typographical errors etc. pointed out by the interveners have been incorporated in the HERC 2nd Amendment to HERC (Rooftop Solar Grid Interactive Systems Based on Net Metering/Gross Metering), Regulations, 2021 wherever found appropriate.

3. Objections / suggestions / comments filed by the Interveners and Commission's view thereto:

The interveners have raised the following issues for the consideration of the Commission.

3.1 Amendment to Clause 11.1(a) of Regulation 11 of the principal Regulations-Energy Accounting

Existing Clause

"Electricity generated from a rooftop solar system shall be cumulatively capped at 90% of the electricity consumption by the consumer at the end of settlement period which shall be the relevant financial year. In case solar power system is connected to the grid during part of the year, the 90% capping shall be on the electricity consumption from the date of connection (to the grid) to the end of the financial year. The carry forward of excess energy generation shall be allowed from one billing cycle to the next billing cycle up to the end of the same financial year. Any excess generation (above 90%) at the end of the financial year shall not be offset against the consumer's consumption. There shall be no carry forward of excess energy to the next financial year."

Proposed

This clause shall be deleted

i. Comments of UHBVNL

Amendment to clause 11.1(a) shall be substituted as under:
Electricity generated from a Rooftop solar system shall be cumulatively capped at 5 kWh per day per kW (or as decided by Hon'ble HERC) of installed solar capacity at the end of settlement period which shall be the relevant financial year. In case solar power system is connected to the grid during part of the year, the aforementioned capping shall be from the date of connection (to the grid) to the end of the financial year. The carry forward of excess energy generation shall be allowed from one billing cycle to the next billing cycle upto the end of the same financial year. Any excess generation within aforementioned capping at the end of the financial year shall be settled by the distribution licensee as per clause 11.1 (g) of these regulations and no carry forward of excess energy beyond this cap shall be permitted to the next financial year. The audit wing shall arrange to ensure 100% audit of net meter billing and payment related to consumer. Reasons the capping is considered essential under current circumstances, as the DISCOMs presently lack a robust mechanism to physically verify augmentation of rooftop solar capacity after commissioning of Solar Plant. It is apprehended that without this capping several complaints may be received highlighting unauthorized enhancement of installed capacity by consumers post-commissioning. Implementing a cap of 5 units per kW per day would act as a deterrent against such practices, thereby discouraging consumers from oversizing their rooftop solar installations solely to gain additional financial benefits beyond sanctioned limits & to limit the 50% loading of distribution transformer as per existing Net Metering Regulations.

ii. Comments of other Interveners;
No one has objected against removing the capping of the solar generation at 90% of consumption in the relevant settlement period.

Commission's view

The Commission notes that all stakeholders have concurred with the proposal for deletion of the 90% consumption cap on solar generation in the relevant settlement period.

The Commission observes that, pursuant to the latest Tariff Order, Monthly Minimum Charges (MMC) have been substituted with fixed charges, hence, there is no relevance of capping the solar generation at 90% of consumption in the relevant settlement period. The Commission further observes that the *principal regulations already stipulate clear limits on the maximum rooftop solar capacity permissible under net metering, accordingly, there is no need for capping the daily solar generation. Hence, the Commission deems it appropriate and in public interest to delete Clause 11.1(a) of the principal regulations.*

Accordingly, Regulation 11.1(a) stands deleted.

3.2 **Amendment to Clause 11.1(g) of Regulation 11 of the principal Regulations-Energy Accounting**

Proposed
Clause 11.1(g) shall be substituted as under:

g) The unadjusted net credited units of electricity shall be settled by the distribution licensee at the end of settlement period as under:

The excess injected electricity units (unadjusted net credited units) at the end of settlement period (April-March) shall be compensated by the Distribution Licensee at 75% of the last discovered SECI tariff up to 31st March of the respective settlement period for Solar energy sources or reference rate as and when determined by the Commission.

Provided that, at the beginning of each settlement period, i.e. April, the cumulative quantum of injected electricity carried forward will be re-set to Zero.

Comments of Interveners on Settlements of Surplus Solar Energy and annual reset of Solar generation credits to Zero.

A) Settlement of Surplus energy

i. Comments of Haryana Rice Exporters' Association / Haryana Chamber of Commerce & Industry

The proposal to purchase surplus power at only 75% of the last discovered SECI tariff undervalues industrial solar generation.

SECI tariff is meant for large utility-scale solar plants, not comparable to the cost structure of rooftop projects.

Neighboring states like Punjab and Himachal Pradesh have adopted net billing or full retail rate offsets for certain categories, or base settlements on state-specific renewable procurement costs.

ii. Comments of Citizen's Welfare Association

The unadjusted credited units of electricity shall be settled by the distribution licensee at the end of settlement period as proposed under:

The excess injected electricity units (unadjusted net credited units) at the end of settlement period (April-March) should be compensated by the distribution licensee at 100% average power purchase cost (APPC) or may be allowed to carry forward to next financial year instead to be set to zero.

iii. Comments of Shri. Ashok Lavasa

- Is a consumer required to pay the interim bills or wait till March 31st of each year for the total solar generation to accumulate so that it can be netted off at the end of the year? This seems a fair arrangement and should be formalized.
- The consumer shouldn't be required to pay any interim bill as was done in our case when we were asked to pay the bill on July 13, 2025 as the solar generation may net off the import from the grid in subsequent months by year end.
- It is also suggested that a consumer bill at the end of the year should be generated around 30th or 31st March so that we can get full benefit of the good solar generation in the month of March.

iv. Comments of Sh. Gian Chand Goyal Chief Engineer PSPCL (Retired)

- For Chandigarh consumers, there is no cumulative cap for electricity consumption at the end of the settlement period relevant to financial year. Also, there is no cap for payment for excess injected electricity units (unadjusted net credited units) at the end of the settlement period as against 75% of the last discovered SECI Tariff, up to 31st march of the respective settlement period for Haryana prosumers.
- In UT Chandigarh, the unadjusted net credited units of electricity as at the end of the F/Y shall be considered as units purchased by the Licensee at APPC (Average Power Purchase Cost) of the Distribution Licensee or Feed-in- Tariff whichever is lower and not at 75% of the last discovered SECI Tariff.

v. Comments of Haryana DISCOMs

Hon'ble HERC while formulating the (Rooftop Solar Grid Interactive Systems Based on Net Metering/Gross Metering), Regulations, 2021 provided the basis for introducing Net Metering to consumers, i.e., prosumers produce energy through Roof Top Solar (RTS) and this energy is used to offset the consumption through Grid thereby reducing electricity bills of such prosumers. Prosumers can also produce more energy than they consume which is exported to the grid, however, this energy is not scheduled by the DISCOMs and therefore, it may have technical implications on the Grid.

It is pertinent to mention that prosumers already derive financial benefits through net metering facility throughout the year. Surplus generated units are unscheduled injections into the system, which cannot be accounted for by DISCOMs in energy procurement planning or forecasting. In effect, such excess generation is "dumped" in the grid.

The intent of rooftop solar policy is to encourage consumers to size their systems in line with their actual demand, not to generate long-term surplus for profit. The HERC vide Net Metering regulations has also not allowed the installation of solar system above the sanctioned load.

Importantly, consumers already get full retail tariff benefit on self-consumed units throughout the year by way of net metering which maximizes their savings.

It is also submitted that, as per the comments submitted by UHBVN on the reply to the discussion paper, it is proposed to fix the maximum solar generation at 5 kWh/kWp/day, since prosumers may otherwise extend their solar systems without intimating the DISCOMs, thereby deriving unintended financial benefits.

Neighboring states like Himachal Pradesh has adopted the rate of 50% of the weighted average rate at which DISCOM has purchased power from the ground mounted solar PV plant upto 5 MW capacity located in the State during the calendar year adjusted with the subsidy and/or grant and/or incentive etc. received by the consumer under any Government Scheme for paying excess injected electricity units (unadjusted net credited units) at the end of the settlement period. For FY 2024-25: 0.61 Rs./kWh to 1.62 Rs./kW which is quite less than the proposed amendment by the Hon'ble Commission**,** i.e., 75% of the last discovered SECI Tariff, up to 31st March of the respective settlement period.

Further, in case of Punjab the electricity generated from the RTS shall not exceed 90% of the electricity consumption by the consumer in a settlement period and in case the electricity generated exceeds 90% of the electricity consumed at the end of the settlement period no payment to be made by the DISCOM and shall not be carried forward to next settlement period and the same shall be treated as inadvertent injection.

Compensating unadjusted net credited units at the end of settlement period at 100% of APPC or retail tariff, as suggested by some stakeholders, would escalate DISCOM's power purchase costs, inflate the ARR, and ultimately increase consumer tariffs across the board—leading to cross-subsidization at the expense of non- solar households and MSMEs. Further, the framework ensures certainty: at the end of each financial year (settlement period), any unadjusted net credited units are settled transparently at the notified rate, ensuring prosumers receive monetary benefit for their contribution to renewable energy. At the same time, consumers already enjoy the full retail tariff offset on self- consumed solar units throughout the year, which maximizes their savings.

It is also submitted that with the installation of solar systems, many prosumers are paying very minimal electricity bills and, in some cases, no bills at all to the DISCOMs. At the same time, DISCOMs continue to incur substantial expenditure towards installation and augmentation of electrical infrastructure, as well as operation and maintenance (O&M) of the system, at par with non-solar consumers.

Further, DISCOMs are already under financial stress due to the impact of net metering, as they are compelled to procure high-cost power during peak hours in order to extend banking benefits to prosumers, whereas the power injected by prosumers for banking is generally supplied to the grid during periods of surplus availability at comparatively lower rates.

If, in addition, the DISCOMs are required to make payments to prosumers for surplus energy injected into the grid, it would result in additional financial burden. Such a situation is detrimental to the financial health and long-term sustainability of the DISCOMs.

Thus, the 75% settlement provision strikes a careful balance—rewarding prosumers, protecting the financial viability of DISCOMs, and safeguarding the interests of the wider consumer base.

In backdrop of above, amendment to Clause 11.1(g), the proposal of DISCOMs is submitted as under:-

The unadjusted surplus energy shall be compensated by DISCOMs at 75% of the lowest discovered SECl/ SJVNL/NHPC tariff up to 31st March of the respective settlement period

OR 75% of the lowest discovered solar tariff in the Haryana upto 31st March of the respective settlement period.

OR 75% of the lowest tariff rate determined by the Commission for the distribution licensee up to 31st March of the respective settlement period, whichever is lowest.

B) Annual Reset of Credits to Zero

i. Comments of Haryana Rice Exporters' Association / Haryana Chamber of Commerce & Industry

- Resetting credits to zero each April without fair compensation results in loss of value for generated clean energy.
- Punjab & Himachal Pradesh permit carry-forward within the settlement period and ensure monetary settlement at fair rates at period end.

ii. Comments of Citizen's Welfare Association

- It is for your kind information that JERC for the state of Goa & other UT's in its Regulation, 2019, for Solar PV Grid Interactive system based on Net Metering in its regulation 11.3 has provided "The unadjusted net credited Units of Electricity at the end of each financial year shall be considered as units purchased by the Distribution Licensee at Average Power Purchase cost of the concerned Distribution Licensee or Feed- in-Tariff determined for the year without considering subsidy and Accelerated Depreciation, whichever is lower."
- Provided that, at the beginning of each Settlement period, the cumulative quantum of injected electricity carried forward will be set to Zero.

iii. Comments of Sh. Gian Chand Goyal Chief Engineer PSPCL (Retired)

In Chandigarh UT, if there is any outstanding Billing Credit at the end of the settlement period, the prosumer has option to receive payment of the net credit balance, if any, or have such credit balance carried over to the next settlement period. In Haryana, this provision does not exist as on date.

iv. Comments of Haryana DISCOM

Hon'ble HERC in the draft 2nd amendment to the HERC (Rooftop Solar Grid Interactive Systems Based on Net Metering/Gross Metering), Regulations, 2021 has proposed that the unadjusted net credited units (excess surplus) at the end of settlement period be paid at 75% of the last discovered Solar project by SECI. So, after compensating for the surplus Solar power at the end of settlement period it is imperative that at the beginning of each settlement period, cumulative carried over solar electricity injected be reset to zero.

It is to submit before the Hon'ble HERC that Himachal Pradesh Electricity Regulatory Commission in HPERC (Rooftop Solar PV Grid Interactive System) (Second Amendment) Regulations, 2022 provides that at the beginning of each settlement period, cumulative carried over solar electricity injected is reset to zero.

Similarly, Punjab Electricity Regulatory Commission in PSERC (Grid Interactive Rooftop Solar Photo Voltaic Systems) Regulations, 2021 and Joint Electricity Regulatory Commission for the State of Goa and Union Territories in JERC (Solar PV Grid Interactive System based on Net Metering) Regulations, 2019, has laid down the similar provisions that at the beginning of each settlement period, cumulative carried over solar electricity injected is reset to zero.

Therefore, the provision for annual reset of credits to zero is appropriate and necessary. It prevents indefinite carry-forward of surplus units - which would otherwise convert into a de-facto commercial sale arrangement rather than a consumer-centric self- consumption model.

The intent of rooftop solar policy is to encourage consumers to size their systems in line with their actual demand, not to generate long-term surplus for profit.

Importantly, consumers already get full retail tariff benefit on self-consumed units throughout the year, which maximizes their savings. Only the unutilized surplus at year-end is reset, ensuring fairness and system discipline.

In backdrop of above, amendment to Clause 11.1(g) as proposed by the DISCOM-

"At the beginning of each settlement period, i.e., April, the cumulative quantum of the injected electricity carried forward will be reset to Zero."

Commission's View

I. *The Commission has carefully considered the submissions from stakeholders and agrees with their comments that the regulation should encourage self-consumption of the units generated by the prosumers. Interveners suggested for utilizing surplus solar energy generated during the winter season, which is typically a low-demand period, to offset or be credited against electricity consumption from the grid during the high-demand summer season. However, the limitation is that the net metering credits from low demand periods effectively expire or reset with the end of the present settlement period in the month of March. This prevents the full utilization of excess rooftop solar generation accumulated during winter in subsequent months of higher demand, for which the interveners are suggesting to carry forward the accumulated units to next settlement period.*

For a better balancing of electricity usage and generation over a full seasonal cycle considering consumption pattern based on climatic condition of the state, the Commission deems it appropriate to redefine the settlement period to commence on 1st October of a calendar year and conclude on 30th September of the following year. This modification will enable prosumers to offset winter-season accumulated solar generation against subsequent summer consumption, thereby providing greater value to prosumers. As a result, the overall net metering framework will become more effective and advantageous for consumers with solar installations.

Commission after taking all relevant factors in to consideration, decides that the Regulation 2.1(ab) of the Principal Regulations shall be substituted as under;

"Settlement period" *means the period beginning from the first day of October in a calendar year and ending with the thirtieth day of September of the next year; Provided that the first settlement period for a newly commissioned roof top solar system will be from the date of commissioning to the thirtieth day of September of next year.*

II. *The Commission notes the divergent views on settlement of surplus energy—while prosumers have sought compensation at the Average Power Purchase Cost (APPC) or feed in Tariff, the distribution licensees have expressed concerns regarding financial viability and grid management.*

Balancing these considerations, the Commission holds that the excess unadjusted units at the end of the settlement period needs to be compensated at a tariff which encourages consumers to install sufficient capacity of solar generator contributing a push to the national mission of maximum solar generation. At the same time the tariff should not be detrimental to financial health of licensee as the licensee has to arrange the power during peak hours also whereas maximum solar generation is during off peak hours.

Accordingly, the Commission decides that the unadjusted net credited units at the end of the settlement period shall be purchased by the distribution licensee at 90% of the Feed-in Tariff determined by the Commission under the PM-KUSUM scheme.

This approach maintains a fair equilibrium between promoting renewable generation and safeguarding the financial sustainability of the sector. Further, to ensure transparent annual accounting, the cumulative quantum *of injected electricity carried forward shall be reset to zero at the commencement of each settlement period (i.e., 1st October).*

Hence, Regulation 11.1(g) shall be substituted as under:

The unadjusted net credited Units of electricity at the end of each settlement period shall be considered as units purchased by the Distribution Licensee at 90% of the Feed-in-Tariff provided in regulation 11.(iii.)(b.) of the principal regulations.

Provided that, at the beginning of each Settlement Period i.e. October, the cumulative quantum of injected electricity carried forward will be re-set to zero.

3.3 **Amendment to Clause 11.6**

Proposed

Clause 11.6 shall be substituted as under:

In case, an eligible consumer leaves the system, such consumer's unused credits for excess energy generated shall be compensated by the Distribution Licensee at 75% of the last discovered SECI tariff up to last day of leaving for Solar energy sources or reference rate as and when determined by the Commission.

i. **Haryana Rice Exporters' Association / Haryana Chamber of Commerce & Industry Comments:**

Compensating unused credits at 75% of SECI tariff upon exit is unfair; the prosumer has already invested capital based on a different financial return assumption.

ii. **Citizen's Welfare Association Comments:**

In case, an eligible consumer leaves the system, such consumer's unused credits for excess energy generated should also be compensated by the distribution licensee at 100% average power purchase cost (APPC)

iii. **Haryana DISCOM Comments:**

It is pertinent to submit before Hon'ble HERC that in case of Punjab, the excess electricity, in case of disconnection, to be considered as inadvertent injection and shall not be paid for by the DISCOM.

It is logical that if a consumer leaves the system through disconnection, the excess Solar energy exported to the Grid, if any should not be paid for by the DISCOM as the objective of Rooftop Solar Policy is to encourage consumers to size their systems in line with their actual demand to offset their consumption and not to generate long- term surplus for profit. In case, a consumer is no longer the consumer of DISCOM, there is no case of offsetting his/her consumption through Grid.

Importantly, consumers already get full retail tariff benefit on self-consumed units throughout the year, which maximizes their savings

The proposed framework is both transparent and equitable. It ensures that prosumers are rewarded for their unutilized surplus generation while avoiding overcompensation that could unfairly burden the distribution licensee and non-solar consumers. Providing 100% APPC or retail tariff for exit compensation, as suggested by stakeholders, would significantly raise DISCOM's procurement costs and lead to cross-subsidization, impacting households and MSMEs that cannot invest in rooftop solar. By applying a 75% benchmark, the approach safeguards financial prudence, aligns with principles of cost-reflective tariff design, and avoids undue strain on the ARR.

In backdrop of above, amendment to Clause 11.6 as proposed by the DISCOM-

"The excess electricity, in case of disconnection, to be considered as inadvertent injection and shall not be paid for by the DISCOM"

Commission's View

The Commission has examined the submissions of all stakeholders and notes that the issue is similar as discussed under Regulation 11.1(g).

In the event a prosumer ceases to be a consumer of the distribution licensee, equity requires that the value of any unadjusted surplus generation up to the date of exit be duly compensated in accordance with the same principles governing year-end settlements.

Accordingly, the Commission decides that, upon exit from the system, the unused credits for excess energy generated by the prosumer shall be settled at 90% of the Feed-in Tariff provided under Regulation 11.(iii.)(b.) of the principal regulations.

Hence, Regulation 11.6 shall be substituted as under:

In case, an eligible consumer leaves the system, such consumer's unused credits for excess energy generated shall be compensated by the Distribution Licensee at 90% of the Feed-in-Tariff provided in regulation 11.(iii.)(b.) of the principal regulations.

3.4 **Additional Points**

A) Replacement of Monthly Minimum Charges (MMC) with High Fixed Charges.

Haryana Rice Exporters' Association / Haryana Chamber of Commerce & Industry Comments:

- The abolition of MMC and introduction of significantly higher fixed charges (approx. 76% increase from 01.04.2025) will penalise industrial consumers regardless of their actual consumption.

- Fixed charges apply even when industries are shut down or operating on full capacity, directly increasing the cost of doing business. Such charges disincentives investment in rooftop solar because the savings from self-generation are eroded by unavoidable fixed costs.

Commission's view

Objection refers to the changes approved by the Commission in the Tariff schedule of consumers in Tariff Order for FY 2025-26 and does not pertain specifically to the subject matter of 2nd amendment to the HERC (Rooftop Solar Grid Interactive Systems Based on Net Metering/ Gross Metering), Regulations, 2021.

As such, these submissions fall outside the scope of the present amendment proceedings, which are confined to modifications in the HERC (Rooftop Solar Grid Interactive Systems Based on Net Metering/Gross Metering) Regulations, 2021.

Accordingly, the comments are not considered in this proceeding.

B) Lack of Net Billing & Captive Policy for Large Industrial Loads.

Haryana Rice Exporters' Association / Haryana Chamber of Commerce & Industry Comments:

- Haryana still restricts net metering to 500 kWp and lacks a net billing or captive solar policy for higher capacities, unlike Punjab & Himachal.
- This limits scalability for manufacturing units with large roof-tops and higher loads.

UHBVNL Comments:

- Haryana has adopted a calibrated approach to rooftop solar deployment with the present framework capping net metering at 500 kWp. This cap is in alignment with the Electricity (Rights of Consumers) Rules, 2020 (as amended), which provide for net metering up to 500 kW.
- Further, for the sake of comparison with other States, this is to submit before Hon'ble HERC that Himachal Pradesh restricts net metering to 50 kWp (10% of the proposed Haryana's Capacity) while Punjab and Chandigarh restricts net metering to 500 kWp (same as the proposed Haryana's Capacity.

Commission's view

These submissions fall outside the scope of the present amendment proceedings; hence the comments are not considered in this proceeding.

C) *Proposal for Inclusion of Blockchain-Enabled Peer-to-Peer (P2P) Energy Trading Platform in Rooftop Solar Energy Ecosystem.*

Comments of Powerxchange Innovations Pvt Ltd

A blockchain-enabled P2P energy trading platform that we have developed to accelerate decentralized, transparent, and efficient rooftop solar energy exchange within Haryana. Our platform is fully aligned with the regulatory framework and built upon the latest digital infrastructure suitable for the evolving energy needs of the state.

Why P2P Energy Trading is Critical Now:

- Empowers prosumers to trade surplus power locally, thereby enhancing rooftop solar uptake.
- Supports DISCOMs in balancing demand by decentralizing load supply.
- Boosts rural electrification and smart energy management through micro-transactions.
- Complies with evolving regulations, including energy accounting, settlement, and pricing mechanisms (e.g., SECI-linked tariffs).

We respectfully request the Commission to consider:

1. Piloting our P2P platform in selected districts of Haryana under regulatory sandbox provisions.
2. Formally recognizing P2P models within the regulatory framework to complement net metering and buyback schemes.
3. Collaborating with DISCOMs and stakeholders to integrate this technology as part of a future ready grid ecosystem.
4. Our platform supports secure transactions, smart contracts, audit trails, and real-time monitoring, ensuring trust and transparency in all energy exchanges. We believe this is an opportune moment to integrate such digital innovations into Haryana's renewable energy strategy.

   We would be honored to demonstrate the platform at your convenience and collaborate on any regulatory or technical requirements needed for implementation.

Commission's view

The Commission appreciates the innovative suggestions regarding blockchain-enabled peer-to-peer (P2P) energy trading platforms. However, the present proceedings are restricted to the amendments proposed in the draft 2nd Amendment Regulations pertaining to net metering and gross metering. The issue of P2P trading falls outside the scope of these regulations and involves separate regulatory and technical considerations relating to market design, grid management, and consumer protection. Therefore, the comments are not deliberated within the ambit of this order.

4. In view of the foregoing deliberations and decisions, and after due consideration of all stakeholder submissions, the Commission hereby finalizes the Haryana Electricity Regulatory Commission (Rooftop Solar Grid Interactive Systems Based on Net Metering/Gross Metering) Regulations, 2021 (2nd Amendment) Regulations, 2025 as detailed in Annexure "A" appended to this Order. The Commission orders that the Regulation, as approved, shall be sent for notification in the Haryana Government Gazette at the earliest.

This order is signed, dated and issued by the Haryana Electricity Regulatory Commission on 30/10/2025

		Sd/-	Sd/-	Sd/-
Date:	**30/10/2025**	**(Shiv Kumar)**	**(Mukesh Garg)**	**(Nand Lal Sharma)**
Place:	**Panchkula**	**Member**	**Member**	**Chairman**

Annexure-A

HARYANA ELECTRICITY REGULATORY COMMISSION
BAYS NO.33-36, SECTOR-4, PANCHKULA-134113, HARYANA

Notification

The , 2025

Regulation No. HERC/54/2nd Amendment/2025

The Haryana Electricity Regulatory Commission, in exercise of the powers conferred under Section 61,66,86(1)(e) and Section 181 of the Electricity Act 2003 and all other powers enabling it in this behalf, after previous publication, makes the following regulations:

1. Short title, Commencement and Interpretation:

1.1. This Regulation shall be called the Haryana Electricity Regulatory Commission (Rooftop Solar Grid Interactive Systems Based on Net Metering/Gross Metering) Regulations, 2021 (2nd Amendment) Regulations, 2025.

1.2. This amendment shall come into force with effect from the date of its publication in the Haryana Government Gazette.

2. Amendment of Regulation 2.1(ab) of the Principal Regulations.

The Regulation 2.1(ab) of the Principal Regulations shall be substituted as under;

"Settlement period" *means the period beginning from the first day of October in a calendar year and ending with the thirtieth day of September of the next year; Provided that the first settlement period for a newly commissioned roof top solar system will be from the date of commissioning to the thirtieth day of September of next year.*

3. Amendment of Regulation 11 of the principal Regulations- Energy Accounting.

3.1 Amendment of Regulation 11.1(a) of the principal Regulations

The Regulation 11.1(a) of the principal Regulations *shall be treated as deleted.*

3.2 Amendment of Regulation 11.1(g) of the principal Regulations.

The Regulation 11.1(g) of the principal Regulations shall be substituted as under;

The unadjusted net credited Units of electricity at the end of each settlement period shall be considered as units purchased by the Distribution Licensee at 90% of the Feed-in-Tariff provided in regulation 11.(iii.)(b.) of the principal regulations.

Provided that, at the beginning of each Settlement Period i.e. October, the cumulative quantum of injected electricity carried forward will be re-set to zero.

3.3 Amendment of Regulation 11.6 of the principal Regulations.

The Regulation 11.6 of the principal Regulations shall be substituted as under;

In case, an eligible consumer leaves the system, such consumer's unused credits for excess energy generated shall be compensated by the Distribution Licensee at 90% of the Feed-in-Tariff provided in regulation 11.(iii.)(b.) of the principal regulations.