

**BEFORE THE HARYANA ELECTRICITY REGULATORY COMMISSION
BAYS No. 33-36, SECTOR-4, PANCHKULA- 134112, HARYANA**

Case No. HERC/PETITION NO. – 49 of 2021

IA No. 3 of 2022

IA No. 4 of 2022

Date of Hearing : 21.04.2022

Date of Order : 04.05.2022

IN THE MATTER OF:

Petition under Sections 42, 61, 86 and 181 of the Electricity Act, 2003 and Regulation 21 of Conduct of Business Regulations, 2019, seeking for reconsideration and amendment thereto of the Haryana Electricity Regulatory Commission (Terms and Conditions for determination of Tariff from Renewable Energy Sources, Renewable Purchase Obligation and Renewable Energy Certificate) Regulations, 2021.

Petitioner

M/s. Faridabad Industries Association (FIA)

Respondents

1. Uttar Haryana Bijli Vitran Nigam Limited (UHBVNL), Panchkula
2. Dakshin Haryana Bijli Vitran Nigam Limited (DHBVNL), Panchkula

Present on behalf of the Petitioner

1. Shri Anand K. Ganeshan, Advocate

Present On behalf of the Respondents

1. Smt. Sonia Madan, Advocate on behalf of HPPC/Respondents.

Quorum

**Shri R.K. Pachnanda
Shri Naresh Sardana**

**Chairman
Member**

ORDER

Brief Background of the case

1. The present petition has been filed by M/s. Faridabad Industries Association (FIA) seeking amendment in certain regulations of the HERC RE Regulations, 2021, to facilitate development of solar power projects in the State of Haryana. The specific reliefs sought by the petitioner are as under: -
 - i) Regulation no. 66 (banking of RE power):
 - a) That the condition of 100% equity holding by the captive users in the captive power plant may be changed to provide 26% equity as provided in Rule 3 the Electricity Rules, 2005.
 - b) That banking of RE power has been restricted to a cumulative capacity of 100 MW, which should be removed. The solar plants operate at a capacity utilisation factor at about 20% and the capacity of 100 MW would translate to actual generation of only about 20 MW, out of which only a small portion would be banked with the Distribution Licensee.
 - c) Banking charges @ Rs. 1.50/unit: Banking charges have increased from 5% of the banked energy in the previous regulations to Rs. 1.50/unit in the present regulations.

Banking charges of 5% is more than sufficient to compensate the Distribution Licensees for the facility being granted. Drawl of banked energy during peak hours, when the tariff for the Distribution Licensees is high, is in any case not permitted.

ii) Regulation no. 72 (Reliability charge):

That reliability charge of ₹ 1.5 per unit is to be paid by the open access generators/consumers. This is provided for keeping in view the imbalance charges as applicable under the Open Access Regulations, whereas, imbalance charges are payable as per DSM Regulations.

Further, Regulation 72 has prescribed a flat rate of ₹ 1.50 per unit as reliability charges, which is in fact applicable on the total quantum of energy generated and injected. This is against the applicability of deviation settlement charges/imbalance charges which are levied only on the deviations beyond the prescribed limits under the regulations of the Central Commission. Further, the quantum of charges under the regulations of the Central Commission in most cases of applicability is lower than ₹ 1.50 per unit.

iii) Regulation no. 72.a (reduction in contract demand to the extent of open access schedule):

The HERC Open Access Regulations, provides for the principle of admissible drawl for an open access consumer i.e. the quantum of power that an open access consumer can draw from the distribution licensee within the contract demand will be reduced to the extent of the open access schedule of the consumer. In case actual solar generation of a consumer falls below the scheduled generation, his drawl from DISCOMs shall increase from the level of entitled drawl. This drawl over and above the entitled drawl is chargeable at twice the normal tariff. Regulation 72(a) provides that the reduction of contract demand shall not be applicable to Rooftop Solar PV projects. The very same principle also ought to apply to the solar projects for drawl of power through open access, since deviation charges have already been provided in the DSM Regulations which are Rs. 1.50/unit in the case of deviations exceeding 30%.

The petitioner has submitted that in the alternative, the Commission may provide that the benefit of revision of schedule and the deviation range as is available to the solar generator, shall also be available to the consumers. In other words, since the solar generator can revise its schedule during the day depending upon the solar generation **possible**, the revision ought to also automatically apply to the consumers to enable them to increase their admissible drawl accordingly.

iv) Accordingly the following prayers have been made: -

- a) Initiate proceedings for amendment of the RE Regulations, 2021 and amend Regulation 66 and 72 to the extent as represented in the above petition;
- b) Pass such other further order(s) as the Hon'ble Commission may deem just in the facts of the present case.

2. Per contra, the respondents herein i.e. the distribution licensee(s) in Haryana that are responsible for purchase of power for onward sale to the electricity consumers in Haryana, have vehemently argued that the petition is not maintainable. The reply dated 01.02.2022, filed in the matter, is as under:-
- i) That the petitioner did not come forward before the Commission at the time of framing of the RE Regulations, 2021. However, similar issues were raised by other intervenors which were duly considered, deliberated upon and dealt with by this Hon'ble Commission in the order dated 27.04.2021, subsequent to the proceedings, the HERC RE Regulations, 2021 was notified in the Haryana Government Gazette on 30.04.2021.
 - ii) That the Regulations framed by the Commission partake the character of subordinate or delegated legislations having the force of law. The validity of the regulations can be only challenged by seeking judicial review thereof.
 - iii) That the cost of renewable power generation has reduced drastically in the recent years and it has been observed that Solar and Wind generation, in particular, does not call for any preferential treatment, as it has attained grid parity.
 - iv) Banking provisions: -
 - a) With the intent to curb gaming of the system under the garb of 'Group Captive', the Commission has restricted the banking facility for the Single consumer / Industry who set-up captive Power Plant for its own use only.
 - b) The consideration of captive generating plant under Rule 3 of Electricity Rules, 2005 is different and independent than the eligibility prescribed under the RE Regulations, 2021 for banking. The Regulations do not take away any right or benefit granted to a captive generating plant within the definition of Rule 3 of the Electricity Rules, 2005.
 - c) **The Discoms have no control for power injected into the system as surplus power on real time basis and further ready to provide additional supply when the consumption occurs.** Apart from the financial implication for the distribution companies, there are issues related to system operation and load/generation balancing for providing banking facility. Therefore, to balance the interest of solar power project, power system operation and general body of consumers, the restriction on the banking up to cumulative contract capacity of 100 MW and levy of banking charges at the rate of Rs. 1.50 per unit is reasonable and justified.
 - d) The cost implication is in terms of (i) keeping ready the equivalent conventional capacity having fixed cost liability to meet consumers demand during the time of day when corresponding solar generation is lower / not available (ii) supply of power through marginally costlier generating station during the period when less / no solar generation is available (iii) the cost implication of DSM/ADSM penalties (iv) the cost implication for absorbing excess solar generation into the grid by backing down

conventional generation when corresponding demand is lower and solar generation is higher. In order to balance the interest of solar power projects and general body of consumers, it is justified to levy banking charges of Rs. 1.50 per unit.

- e) The Regulation provides that initially the RE power shall be allowed to be banked up to the cumulative contract capacity of 100 MW, after which the Commission shall review the provisions of banking taking into consideration the financial impact on the distribution companies. However, even the limit of 100 MW, specified for banking, has not been exhausted, till date.
- v) Reliability charges (Regulations 72)
That imbalance charges as per the Open Access Regulation will not be applicable for the Solar Power generated and consumed within the State in real time. However, Open Access consumers/generators shall pay Rs. 1.50/unit for injection/drawl of solar power in the grid as reliability charges.
- vi) Regulation no. 72.a (reduction in contract demand to the extent of open access schedule):
That RE Regulations, 2021 already provide benefits in forms of waiver of imbalance charges specified under the OA Regulations. The petitioner has misinterpreted and wrongly projected the impact of the provisions of the HERC (Forecasting, Scheduling and Deviation Settlement and related matters for Solar and Wind Generation) Regulations, 2019 (hereinafter also referred as 'F&S Regulations') and provisions of the HERC (Terms and Conditions for grant of connectivity and open access for intra-State transmission and distribution system) Regulations, 2012, (hereinafter also referred as 'OA Regulations') and Regulation 72(e) of the HERC RE Regulations, 2021. The F&S Regulations are only applicable to Wind and Solar Energy Generators in Haryana which are connected to the Intra-State Transmission /Distribution System. The solar and wind generators have accordingly been mandated to forecast and schedule its generation in advance so that demand-supply position can be better planned to ensure grid security. The Regulations provides for levy of deviation charges on generators for deviation in scheduled generation. Such deviation charges are based on absolute error which is the percentage of deviation with respect to total cumulative capacity rating of the wind turbines/ solar inverters and thus, are not onerous. The intent of levy of such charges is to encourage the generators to make efforts to forecast generation effectively. Even otherwise, if the petitioner is aggrieved with deviation charges specified by the Hon'ble Commission, the petitioner has to challenge the provisions of the F&S Regulations, which cannot be done in the present proceedings.

Commission's Analysis and order

3. The case was heard on 21.04.2022, as scheduled, in the court room of the Commission. At the outset, the Commission considers it appropriate to decide the issue of locus standi of the petitioners herein, to file the present petition. The Commission has considered the argument of the learned Advocate Shri Anand Ganeshan, appearing for the petitioner Viz, Faridabad Industries Associations as well as the learned Advocate M/s Sonia Madan putting in appearance for the respondent Nigam/HPPC. On the issue of locus standi, M/s Madan vehemently argued that the petition is not maintainable as the petitioner herein is not an aggrieved party and has no locus standi in the matter. Per contra Sh. Ganeshan argued at length that FIA is a registered association of industrial and commercial consumers in Haryana contributing to the people of the State and the Country who are bonafide HT supply consumers of the power utilities. It has been further submitted that the issues under consideration are of vital interest to them as it has impact on the future development of the solar power projects in Haryana as the existing dispensation has made solar power projects un-viable in Haryana. Additionally, the petitioner i.e. FIA has relied on Regulation 12 and Regulation 21 of the HERC (Conduct of Business) Regulations in vogue as well as Section 2(49) of the Electricity Act, 2003.

Regulation 12 and 21 of the HERC (Conduct of Business) Regulations, 2019, provides as under:

"12 The Commission shall, at all times, have the authority, either on an application made by any interested or affected party or suo motu, to review, revoke, revise, modify, amend, alter or otherwise change any order made or action taken by the Secretary or the Officers if the Commission thinks fit."

"21 Participation of Consumers Association or Other Petitioners

- (1) The Commission may permit any persons/ group of persons including any group of consumers to participate in any proceedings before the Commission on such terms and conditions including in regard to the nature and extent of participation as the Commission may consider appropriate."*

The petitioner herein is a registered association and has filed the case in a representative capacity. The petitioner has further cited a few case laws emanating from various judgments of the Hon'ble APTEL, wherein proceedings at the behest of the association were upheld. Considering the above, it can be said that the petitioner in this case has the locus standi to file the present petition.

4. Regarding the issue of equity, the petitioner has submitted that the relief sought regarding the condition of banking with respect to equity participation by captive users, has already been addressed by the Commission in the HERC RE Regulations, 2021 (1st Amendment), 2022, notified on 31.03.2022. Therefore, nothing survives for consideration of this issue.
5. **So far as the other issues raised by the petitioner, are concerned, the Commission observes that similar issues were raised by other intervenors which were duly considered, deliberated upon and dealt within the order dated 27.04.2021; resultantly the HERC RE Regulations, 2021 were notified on 30.04.2021. The operative part of the ibid order of the Commission dated 27.04.2021, is reproduced hereunder:-**

“8. Issues raised by HPPC: -

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vii) Regulation 66(1) specifies the contract capacity up to 100 MW instead of ‘cumulative contract capacity’ shall be eligible for Banking. The discussion paper also provides that banking of RE power shall be allowed throughout the year, however, the drawl of banked power shall not be allowed during the peak months (July to mid-October). The banking facility so proposed for renewable generators enables them to inject their surplus power into the grid and withdraw the same as per their convenience. Whereas, Discoms have to manage for all kind of infirmities and absorb the DSM/ADSM penalties to accommodate infirm injection of renewable power. Needless to mention that the banking facility has cost associated with it. It is submitted that the cost of Renewable generation has reduced drastically in the recent years and it has been recognized at all levels that Solar and Wind generation in particular does not call for any preferential treatment. As the generation cost from these sources has declined to Rs. 2.00 per unit it would not be appropriate by any means to further subsidize the same at the cost of consumers at large.

Due to an abnormal spurt in the power purchase cost and deteriorating financial position of the Discoms of the State, the Government of Andhra Pradesh vide notification dated 18.11.2019 inter-alia has withdrawn the banking facility extended to the RE Generators. Further, the Hon’ble Karnataka Electricity Regulatory Commission in its discussion paper has proposed to discontinue the banking facility which had earlier been extended to solar, mini hydel, and wind power projects, for both REC and non-REC route-based projects Discoms already have to deal with the huge gap between the intra-day minimum and maximum demand which can be up to 2500 MW and the banking of RE power further adds challenge to that. The level of accuracy of demand forecast will become a matter of concern as the increase of RE power integration will pose huge challenge in maintaining Unscheduled Interchange (UI) between permissible limits. Further, Discoms/HPPC is not equipped with any facility to store the banked power for its future use in an economical manner. Owing to the fact that no storage facilities are available

with the Discoms/HPPC for storage of surplus power it would be rather impractical, challenging and uneconomical for Discoms/HPPC to grant banking facility to RE based generators.

It is pertinent in this regard to bring to the kind notice of Commission that Hon'ble Central Electricity Regulatory Commission (CERC) has now approved Green Term Ahead Market (GTAM) contracts on the Indian Energy Exchange (IEX) platform wherein RE Generators can trade their green energy and avail benefits of competitive prices and transparent and flexible procurement. Such contracts itself serves as a pool of energy and facilitates Renewable generators. The generator may opt to sell excess renewable power in energy exchanges and purchase subsequently as per his requirement. The power exchanges are thus by large acting as a pool which can be used effectively by renewable generators with impacting the Discoms. Moreover, since the captive users are eligible for several concessions under the Electricity Act, 2003, facilitating banking facility to renewable based captive generators under the garb of promotion would lead to direct revenue loss to the Discoms which will ultimately be passed to consumers at large by the way of electricity tariff. Thus, in view of the above, the Commission is requested to withdraw the banking facility and to delete the provision of Banking of RE Power from the Regulations.

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10. Issues raised by M/s. Shree Cements:-

M/s Shree Cement Ltd. has submitted that it has a cement grinding unit at Panipat. The grinding unit has a HT supply connection of 8MVA with UHBVN. The Company also has 1247 KWp Captive Solar Power Plant located within its factory premises. Further, it is considering expanding its RE generation capacity by setting up a MW scale PV solar plant to meet its captive power requirement at the grinding unit. In this regard, comments/suggestions are as under:-

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ix) Clause 66:

a) Banking should be permitted from both Co-located as well as distant located RE based captive generating plants in the state.

b) Further, power wheeled from outside the state for captive consumption should also be allowed to be banked in case the same doesn't get consumed.

The Commission has considered the above and observes that banking facility is allowed to the RE based CPP fully owned by the consumer. However, to cushion the adverse impact of such banked power brought from outside Haryana and not consumed, which may not also be required by the Discoms, the banking facility ought to be restricted to the contracted demand / sanctioned load of the consumers. Hence, the suggestion of the intervener is iniquitous and unacceptable.

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Commission's View

The Commission has carefully examined the comments/suggestions filed by HPPC. The Commission observes that the changes suggested by HPPC in the provisions of the draft Regulations are mostly in consonance with the provisions in Central Electricity Regulatory Commission (Terms and Conditions for Tariff determination from Renewable Energy Sources) Regulations, 2020 (CERC RE Regulations, 2020) and Ministry of Power Order dated 29.01.2021. Accordingly, finding some merit in the suggestions of the HPPC, the followings, have been incorporated in the draft Regulations:-

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(vii) The Commission has taken note of the submissions of the intervener on 'banking of power' and observes that banking is a facility provided to the CPPs / Consumer; however, the same ought not to impose additional financial burden on the Discoms in an unreasonable manner which passes on to the ultimate consumers of electricity in Haryana. The Commission, as averred by the intervener (HPPC), is not inclined to withdraw the banking facility as such. However, The Commission is conscious of the fact that there is a need to curb gaming of the system under the garb of 'Group Captive', which is nothing but third-party sale, thereby depriving the Discoms of the revenue which they would have otherwise realised from Cross-Subsidy Surcharge and Additional Surcharge as well as avoidable cost of banking facility intended for the Consumer / Industry who set-up CPP primarily for its own use. Resultantly, the provision for 'banking of power' shall be modified to cushion un-reasonable financial burden on the Discoms which ultimately passes on to the electricity consumers at large, as under:

a) Banking shall be allowed to the captive power plant which are owned and operated by a single consumer with 100% equity holding in the CPP.

b) Banking shall be allowed by DISCOMs up to a cumulative capacity of 100 MW. Provided that the Commission may review the provisions of banking taking after into consideration the financial impact on the DISCOMs. The Discoms are directed to prepare a report on the quantum of power banked during the first half of the FY 2021-22, revenue earned from the charges levied for extending the banking facility to the eligible entities vis-à-vis the computed revenue loss / cost. HPPC has submitted that financial implication on account of variation of renewable generation is Rs. 1.50/unit, as tabulated below:-

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Accordingly, in order to balance the equity in both sides, banking charges @ 1.50/unit shall be levied. Further, Open Access consumers/generators shall also pay Rs. 1.50/unit for injection/drawl of solar power in the grid as reliability charges.

d) Banked power not drawn as per schedule, shall be considered as dumped energy & shall lapse. The Discoms shall not be liable to pay for such dumped energy.

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“10. Issues raised by M/s. Shree Cements:-

M/s Shree Cement Ltd. has submitted that it has a cement grinding unit at Panipat. The grinding unit has a HT supply connection of 8MVA with UHBVN. The Company also has 1247 KWp Captive Solar Power Plant located within its factory premises. Further, it is considering expanding its RE generation capacity by setting up a MW scale PV solar plant to meet its captive power requirement at the grinding unit. In this regard, comments/suggestions are as under:-

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x) Clause 66 (1):

a) *Banking Charges should remain unchanged at 5% of power banked (in kind). The proposal to levy 1.50 Rs/Kwh as banking charges will put onerous financial burden on the renewable energy generators and will make their operations unviable.*

b) *Levy of such high banking charges is also against the spirit of Section 86 (1) (e) of Electricity Act 2003, which defines promotion of co-generation and generation of electricity from renewable sources of energy by providing suitable measures for connectivity with the grid and sale of electricity to banking charges in cash would make setting up and wheeling in the state unviable for captive users.*

c) *Without prejudice to the above submission of keeping the banking charges unchanged at 5% of energy banked (in kind), it is also submitted that levy of such charges cannot be adhoc and must be based on some scientific studies, supported by relevant data, Moreover, such charges are compensatory in nature to fulfil the losses of Discoms for providing such promotional facilities. These cannot be considered as revenue earning sources.*

Clause 66 (2): The banked energy that remains unutilized at the end of financial year shall be paid at APPC of Haryana Discoms or at a rate decided by the HERC. Further, such unutilized power should be accounted towards RPO compliance of Discoms.

xii) *Clause 66 (3): The power that is banked during peak months i. e. from July to Oct should be allowed to be drawn during these (peak) months.*

Clause 66 (5):

Open Access power through Bilateral transactions should be added in settlement priority at s.no. 5. Also Banked power should be accorded lower priority as compared to open access power. Therefore, the modified order of priority should be:

- 1. RE generation after deducting losses.*
- 2. Captive Power*
- 3. Open Access Power through Exchange*
- 4. Open Access Power through Bi-lateral transaction*
- 5. Banked Energy*
- 6. Discom power*

The Commission is of the view that restriction on banked power is also required during the peak load hours / periods as it would aggravate peak demand and additional costs for meeting power during the peak periods that would get passed on to the electricity consumers at large, which is avoidable. The Commission has considered the above objection and is of the view that banking of RE Power is a facility extended to the eligible RE generator and it imposes cost on the Discoms on several counts i.e. cost of grid integration as the solar generator may not be located near a load Centre, intermittent nature of such RE Power requiring additional capacity arrangements to step in when such power is not available etc. Further, payment for the banked power remaining unutilized at the end of the financial year would adversely affect the revenue balance of the Discoms and also against the objectives of the banking facility. Hence, the same, as suggested by the intervener, lack merit as the same would tantamount to unjust enrichment at the cost of the Discoms and its ultimate consumers. Thus, no further changes in the regulations are required.”

The Commission has further decided at sub para vii of para 8 (ix) of the order dated 27.04.2021, as under:-

“vii) The Commission has taken note of the submissions of the intervener on ‘banking of power’ and observes that banking is a facility provided to the CPPs / Consumer; however, the same ought not to impose additional financial burden on the Discoms in an unreasonable manner which passes on to the ultimate consumers of electricity in Haryana. The Commission, as averred by the intervener (HPPC), is not inclined to withdraw the banking facility as such. However, The Commission is conscious of the fact that there is a need to curb gaming of the system under the garb of ‘Group Captive’, which is nothing but third-party sale, thereby depriving the Discoms of the revenue which they would have otherwise realised from Cross-Subsidy Surcharge and Additional Surcharge as well as avoidable cost of banking facility intended for the Consumer / Industry who set-up CPP primarily for its own use. Resultantly, the provision for ‘banking of power’ shall be modified to cushion un-reasonable financial burden on the Discoms which ultimately passes on to the electricity consumers at large, as under:

- a) Banking shall be allowed to the captive power plant which are owned and operated by a single consumer with 100% equity holding in the CPP.
- b) Banking shall be allowed by DISCOMs up to a cumulative capacity of 100 MW. Provided that the Commission may review the provisions of banking taking after into consideration the financial impact on the DISCOMs. The Discoms are directed to prepare a report on the quantum of power banked during the first half of the FY 2021-22, revenue earned from the charges levied for extending the banking facility to the eligible entities vis-à-vis the computed revenue loss /cost.
- c) HPPC has submitted that financial implication on account of variation of renewable generation is Rs. 1.50/unit, as tabulated below:-

Item No.	Balancing Cost	Rs./Unit
1	Total balancing charge for CGSs Coal and gas based station (fixed +fuel charge for operating at lower PLF)(Rs/kWh)-Spread over renewable generation	0.06
2	Total balancing charge for Haryana Coal stations (fixed charge for operating at lower PLF)(Rs/kWh)-Spread over renewable generation	0.69
3	Impact of DSM charges per unit (Rs/kWh)- Spread over renewable generation	0.18
4	Impact on tariff (Rs./Unit) for Haryana DISCOMs for backing down Coal generation assuming solar and wind at Rs. 2.8/kWh and coal fuel charge at Rs. 2.5/kWh- Spread over renewable generation (Considering 25% on account of renewables)	0.075
5	Stand by charge (Rs/kWh)- Spread over renewable generation	0.23
6	Extra transmission charge (Rs/kWh)- Spread over renewable generation	0.26
	Total Impact- Spread over renewable generation (Rs/kWh)	1.50

Accordingly, in order to balance the equity in both sides, banking charges @ 1.50/unit shall be levied. Further, Open Access consumers/generators shall also pay Rs. 1.50/unit for injection/drawl of solar power in the grid as reliability charges.”

6. In the circumstances stated above, the petitioner was directed to justify the change in circumstances or law which may merit consideration as prayed for in the present petition. The issues in the present matter are exactly similar to the issues already decided by the Commission, vide its order dated 27.04.2021 w.r.t. change of law and are, therefore, hit by res-judicata.

7. The other issue raised by the petitioner herein is whether levying of banking charges @ Rs. 1.50 per unit is reasonable or not?

The Commission on this issue is of the view that the petitioner has not explained the cause and implication of levying the banking charge @ Rs. 1.50 per unit on it. The Regulation provides that initially RE power shall be allowed to be banked up to the cumulative contract capacity of 100 MW, after which the Commission shall review the provisions of banking taking into consideration the financial impact on the distribution companies. However, even the limit of 100 MW, specified for banking, has not been exhausted, till date. Further, the concept of doctrine of res judicata is applicable on this issue as the Commission has already discussed this in its earlier order dated 27.04.2021.

8. The Commission has examined the submissions of the petitioner and observes that it has already decided the issues providing reasoning for incorporating such provisions in its order dated 27.04.2021 and, subsequent to that, there is no change of circumstances caused by a change of law, judgement of the Hon'ble Supreme Court or Hon'ble APTEL which may warrant the Commission to reconsider its decision. Accordingly, nothing survives for consideration of the Commission.
9. Since the main case has been decided, the interlocutory applications (IA No. 3 of 2022 and 4 of 2022) filed by M/s. Merino Industries Limited and M/s. Distributed Solar Power Association (DiSPA) stand disposed of, with a liberty to the applicants to file a separate petition, if desired. All the pending applications (if any) are also disposed of accordingly.
10. In terms of the above, the present petition as well the IAs are dismissed as infructuous.

This order is signed, dated and issued by the Haryana Electricity Regulatory Commission on 04.05.2022.

Date: 04.05.2022
Place: Panchkula

(Naresh Sardana)
Member

(R.K. Pachnanda)
Chairman