



Renewable Energy Producers Association

Reg. No. SRG/Dindugul/131/ 2024

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By Direct Delivery

To

Date: 25.05.2026.

Shri. R. Nirmalkumar,

Hon'ble Minister for Energy Resources and Law,

Government of Tamil Nadu,

Fort St. George,

Chennai-600 009.

Most Esteemed Sir,

Sub: Meeting of the Hon'ble Minister with the Renewable Energy Generators and Developers on 25.05.2026-Regarding.

Ref: The Invitation extended to our Association by the Chief Engineer-NCES, Chennai on 22.05.2026 confirmed by a WhatsApp Message dated 23.05.2026.

We whole heartedly place our bunch of thanks, over the dynamic steps and proactive actions, taken by the Hon'ble Minister, which are highly progressive and considered with high speed and velocity, in the matter of Electricity Administration, at all the levels of Tamil Nadu Electricity Board, immediately on assuming charge, as Hon'ble Minister for Electricity. These progressive steps initiated, taken and implemented by the Hon'ble Minister, will always be remembered there, in the History of Tamil Nadu, as the retrograde practices prevailed for more than 60 Years, in the State, were all now abolished and converted in to positive and progressive steps, aiming to achieve and make the best Electricity Board, as it was once, earning good profits. We wish that the proactive steps of the Hon'ble Minister be continued forever and we express our support in all the ways and means.

We also whole heartedly thank the Hon'ble Minister, for having invited the Renewable Energy Generators and Developers, in the State of Tamil Nadu, for a discussion, to understand the issues they are currently facing, with the approach of the various Wings of the Tamil Nadu Electricity Board. Accordingly, we briefly present the following matters, for the benign consideration of the Hon'ble Minister and for a possible redressal at the earliest.

Repowering Policy for WEGs still not brought-in for Enforcement:

- A. On completion of 20 Years of Designed Life Time of the WEGs, in order to continue their generation, a Policy was provided by the Government of Tamil Nadu and finally, the Policy was notified for Enforcement as per G.O. (Ms.) No. 3 Energy (E1) Department dated 14.01.2026 with due amendments as suggested by the Repowering Sub-Committee. Accordingly, as the matters were earlier agitated before the Hon'ble Division Bench on the Writ Appeals filed by the TNEB, the RE Generators have consented to close the pending Writ Appeals filed by the TNEB and accordingly, with some directions, the Hon'ble Division Bench has disposed off the matter on 09.02.2026. However, for implementing the directions of the Hon'ble Division Bench, the TNGECL has not taken any steps to implement the Policy in the State, so far. Hence, the Hon'ble Minister may issue necessary directions to the TNGECL, to comply with the Court Orders and make the Policy implemented in the State, so as to continue the working of the WEGs completed 20 years smoothly for the remaining of their operational life period and this will also bring new investments in Tamil Nadu on the Wind Energy by way of Repowering and Refurbishing the Old WEGs and also by way of Investments in the Hybrid Wind and Solar Segment.

Need for a RE Policy:

- B. In all other States, either separate Wind Energy Policy and Solar Energy Policy or a Comprehensive Renewable Energy Policy, was made available, so as to understand the Policy and the benefits of making investments in the RE Sector in the State. However, the State of Tamil Nadu, being a pioneer in Renewable Energy Segment and is poised to have all the potentials to harness the Renewable Energy, both from Wind and Solar, it is highly unfortunate that our State has no Comprehensive RE Policy or a Policy for Wind Energy and Solar Energy at least separately. Only with the Policies, the Government can show case to the Investors and accordingly, invite more investments in the RE Sector. Considering the potential available in the State, Policies can be brought-in for implementation in the State, which will definitely boost the investments manifold.

Deficiency in Services related to Wind Energy Generators / Solar Energy Generators:

- C. Wind Energy Generators are owned by Small Enterprises mostly falling under MSMEs. Consequential of the Business Environment, Small Capacity Generators are sold as used machinery and accordingly, other required Industries are purchasing such used WEGs. On purchase, they have to make the ownership of WEGs

changed in the New Purchaser's Name and this has to be approved by the NCES Wing. Likewise, the WEGs hitherto selling the power to the Board, when changed for captive use, the purpose needs to be changed by cancelling the existing Energy Purchase Agreements and entering in to a new Energy Wheeling Agreements. These efforts are followed with the NCES Wing of TNEB / TNGECL. There are enormous delays happening which leads to deficiency of services to the RE Generators and hence, such processes have to be made online and a neat system has to be introduced to streamline the entire requirements to avoid malpractices.

Connectivity / Wheeling Approvals:

- D. For the New Projects both in Wind Energy and Solar Energy, to make them functional, connectivity approvals are being granted by the NCES Wing and this has to be regulated through an Online Mechanism based on First Come-First Served Basis, by fixing clear deadlines for each movement of files. This includes, addition of New Captive Users / Change of Utility (from Sale to Board to Captive Use and viz-a-viz)/ Approval of Third-Party Sale of Renewable Energy / Change of Ownership or Name Changes within a given time frames.

Network Charges on Rooftop Solar:

- E. Whenever any Domestic, Commercial or Industrial Consumer goes for Rooftop Solar (behind the meter or GISS), a Network Charge of Rs. 1.04/Unit for the HT Industrial Consumers and an exorbitant rate in the case of Domestic, Commercial and MSME LT Consumers is being charged. This way of collecting the Network Charges for Solar Rooftop Systems, is in practice only in the State of Tamil Nadu. Even though, there is no actual Networking happening in the whole process, the TNPDC is adamant in collecting the Network Charges, which completely discourages the Rooftop Solar System in Tamil Nadu. Even though, the Hon'ble High Court has set aside the System by its Order passed on 22.12.2024 itself, with unsustainable grounds, the TNPDC has filed a Writ Appeal and got Stay Orders only in respect of few Consumers and is continuing to collect the same, even though, it knows well that the matter will not be successful at Appellate Forums. Hence, the System of collection of Network Charges needs to be dispensed with and however, we all agree, to levy the Network Charges, when the energy is exported to the Grid, where the actual Networking happens. Therefore, on the energy self-generated and self-consumed through Rooftop Solar, need not to be levied with Network Charges.

Poor Infrastructure in Transmission and Distribution Lines:

- F. Even though, both the TANTRANSCO and TNPDC, collect charges towards Transmission and Wheeling from the Open Access Consumers regularly without any concession, the amounts so collected, are not being used for the development, upkeep and maintenance of Transmission and Distribution Lines in a proper manner. This leads to lot of issues and loss of energy for want of Grid availability, even when the machine availability and Solar / Wind availability are abundantly available.

Likewise, every Open Access Consumer is also paying Grid Operation and Maintenance Charges based on the capacities of their Power Generators and in spite of collecting the same, the Distribution / Transmission Lines are not properly maintained.

Poor maintenance of Sub-Stations:

- G. The Transformers installed at Sub-Stations are going frequently out of order and because of the same, even when good Wind is available, the Wind Energy is not able to be harnessed or evacuated due to such high level of Transformer failures. The renewable energy which is available only during the seasons (starts by mid of May and ends by mid of October) are not able to be harnessed fully at the seasons, due to the frequent failure of Transformers. Hence, all the Sub-Stations require to be checked properly on a yearly basis before the start of the Wind Seasons for effectively harnessing the Wind Energy Generation. As the Wind Season has started now, this exercise can be ordered to be undertaken immediately.

RE Curtailments:

- H. Currently, the Renewable Energy Curtailments are in full control and the evacuation of Renewable Energy is going on smoothly. This has to be ensured in the coming seasons too and the costly Renewable Energy needs to be harnessed fully and efficiently by ensuring 100% Grid Availability. However, in the Solar Energy Segment, the Curtailment is still on the higher side, which needs to be brought down to the maximum extent possible. Every unit of energy evacuated would reduce the burden of utility from getting the energy from other sources at a higher cost.

Revisiting of DSM Regulations:

- I. In a RE rich State like Tamil Nadu, implementation of Forecasting, Scheduling and Deviation Settlement Mechanism has to be implemented in a phased manner without any rushing. The Utilities

concerned like TNPDC at Consumption End and TNGECL at Consumption End and also the SLDC, being a Grid Manager, are not fully equipped with connected Infrastructure both by Software and Hardware. Without equipping themselves ready to implement the Regulation, rushing to implement the Regulation in a hurried manner would affect the whole System abruptly. Hence, the DSM Regulations, mandating to 15 Minutes Time Block Adjustment between injected energy and consumed energy has to be revisited still with practical areas where the implementation is hindered. Hence, a detailed revisiting is required.

- J. Though the RE Generators are paying a System Operation and Scheduling Charges on a monthly basis to the DISCOM, the RE Generators are not getting the Real Time Generation Data from the DISCOM even today. However, the RE Generators are made obligated to Forecast and Schedule their Generation on a daily basis and on a 15 Minutes Time Block Intervals, even without sharing the Real Time Data by the DISCOM. Moreover, for any deviations on such Forecasted and Scheduled Generations, the RE Generators are penalized by way of a DSM Charge which is again exorbitant. For Forecasting and Scheduling of the day-to-day RE Generation on a 15 Minute Time Block Interval, the supply of Real Time Data is just and necessary for maintaining high level of accuracy.

GEOA Regulation has to be withdrawn:

- K. The TNERC which is supposed to function as an independent quasi-judicial body, is mostly occupied by the officials of TNEB and therefore, it almost functions as an extended arm of TNEB only. Even with the Chairman and Members, it functions like another Wing of TNEB only, from 2014 onwards. Earlier to it, only I.A.S. officers were occupying as Chair Person of the Commission and the matters were decided most judiciously and only after 2014, the induction of Chairman and Members were nominated from TNEB. This has resulted in to plethora of disputes between the Generators / Consumers and the Utility like DISCOM, SLDC etc. Hence, the recently enacted Green Energy Open Access Regulation 2025 has to be withdrawn and the Regulation should aim to promote the Green Energy instead of aiming to abolish the investments in Renewable Energy Sector.

TNERC has to be revamped:

- L. The existing TNERC is mostly functioning as an extended arm of TNEB, from 2014 onwards for reasons obvious. Therefore, in order to gain the image and competence back, without any clash of interest and also to ensure completely a judicious approach,

competent persons need to be appointed from the cadres of I.A.S. or Retired High Court Judges, so as to ensure its functions more efficiently and effectively, in order to reduce the growing disputes.

Maintenance of TPSs / Feeder Lines and Sub-Stations during the Wind Season is active:

M. As the Wind Season is active from 19th of May 2026, the Wind Energy injected to the Grid has started improving and now, it is touching more than 80 Million Units every day. This position will continue, till September 2026. Considering the active Wind Season, all Thermal Power Stations (TPSs), Feeder Lines and Sub-Stations can be taken up for Preventive Maintenance during the Wind Season and they can be kept ready for better Transmission and Distribution, once the Wind Season is over by September 2026. This was a normal practice followed by the TNEB and however, in the recent years, such a practice was discontinued for no reasons.

Formation of a High-Level Committee to address the Grievances of RE Generators:

N. Since the Grievances of the RE Generators are high in quantum, to address the same, a High-Level Grievance Redressal Committee can be constituted under the Chairmanship of Managing Director-TNGECL, with Ex-Officio Secretaryship of CE NCES and with the participation of members from Associations of RE Generators. This will pave way for the speedy redressal of Grievances of RE Generators then and there.

Overall loss picture (T&D + theft):

- O. In Tamil Nadu (TN), transmission losses are relatively low, but overall power loss levels (T&D + theft) are from moderate to high-level compared with many other Indian states.
- P. Tamil Nadu's total T&D loss is around 12-13% of input power, which is better than the National average and many Northern/Eastern States, but still higher than the lowest loss states like Lakshadweep or some southern peers.
- Q. Celebrated official reports and discom rating studies note that Tamil Nadu consistently records elevated AT&C (Aggregate Technical & Commercial) losses, often around 12-18%, driven mainly by distribution side inefficiencies and power theft rather than transmission flaws.

Other points for consideration:

To boost Wind Energy Investments:

- Bringing back the Annual Banking Facility for all WEGs.
- Providing Interest Subvention.
- Providing Government Lands on a Long-Term Lease basis.
- Suspend the TN GEOA Guidelines permanently.

To boost the Solar Energy Investments:

- Removal of Network Charges for the self-consumption units from the Rooftop Solar Systems.
- Collection of Network Charges for the exported units (Supplied to the Grid) from the Rooftop Solar Systems.
- Providing Interest Subvention.
- Providing Government Lands on a Long-Term Lease basis for Grid Connected Solar Projects.
- Suspend the TN GEOA Guidelines permanently.
- Introducing Annual Banking Facility for SPGs also.
- Extension of Open Access to LT / LT CT Supplies also.
- Provision of subsidized Solar Panels to domestic (0 to 200 units) consumers, Micro and Small Agricultural (up to 5 Acres or 5 HP Motor) Farm Owners and other Hut / Cottage Industries, instead of providing free electricity. The capital cost towards the same can be recovered through CSR Funds or voluntary donations from various Body Corporates.

Conclusion:

We hereby appreciate the Hon'ble Minister whole heartedly, for having taken immediate and swift efforts to abolish the so called "Party Fund System", prevailing for almost more than 3 decades in Tamil Nadu. We expect that the Hon'ble Minister would be continuing to make such revolutions in the field of Electricity Administration in Tamil Nadu and we hope that the TNEB will be soon out of losses and would regain its profitability very soon.

As an Association of Renewable Energy Generators, we whole heartedly support all the measures taken by the Hon'ble Minister and ensure our enduring support for the efforts proposed to revamp the whole TNEB and TNERC.

Thanking You, we remain Sir.

Yours Truly,

For Renewable Energy Producers Association



(Dr.K.Venkatachalam)
Chief Advisor cum CEO