

July 2025

A snapshot of the Approved List of Models and Manufacturers introduced by the Ministry of New and Renewable Energy

The Approved List of Models and Manufacturers ("**ALMM**") is a regulatory mechanism introduced by the Ministry of New and Renewable Energy ("**MNRE**") in January 2019 to ensure the quality and authenticity of solar photovoltaic ("**PV**") modules and cells used in certain projects. ALMM was conceived to address concerns regarding misrepresentation by solar manufacturers about products' origin or quality etc.

Under the ALMM framework, MNRE enlists eligible models and manufacturers of solar PV cells and modules that comply with Bureau of Indian Standards ("**BIS**") quality standards along with efficiency threshold requirements *viz*:

- 1. ALMM Order dated January 2, 2019 ("2019 ALMM Order") provided for 2 (two) separate lists i.e. List-I for solar PV modules and List-II for solar PV cells;
- 2. the first formal ALMM List-I (for modules) was approved and published by MNRE on <u>March 10, 2021</u>. This list required BIS compliance; and
- 3. an efficiency threshold was introduced by MNRE in its Office Memorandum ("**OM**") dated May 10, 2023.

Only the models and manufacturers included in the ALMM list are permitted for use in the designated solar power projects (detailed below). This ensures use of tested quality products from vetted manufacturing facilities.

The conditions have undergone several changes from time to time to meet the industry demands. Initially, in 2019 ALMM requirements applied only to solar projects that are implemented by the Government or receive Government support and projects set up for sale of electricity to the Government under Section 63 of Electricity Act, 2003. In January 2022, MNRE, *vide* OM dated January 13, 2022, expanded the scope of ALMM to include renewable energy projects under open access and net metering arrangements. After this amendment, any new solar projects applying for open access (third-party sale of power) or net metering (rooftop solar with grid feed-in) would also need to use ALMM-listed modules.

Key developments (2019 till 2025)

- 1. **January 2022 Scope expansion**: An amendment on January 13, 2022 broadened ALMM's applicability to include open-access and net-metered projects (in addition to government and utility-scale projects). Consequently, from a set date, even privately developed projects using open access or net metering would need ALMM-approved modules.
- 2. <u>October 2022</u> Exemption: MNRE clarified that private rooftop or captive self-consumption projects i.e. projects without any export to grid are not subject to ALMM (modules or cells).

- 3. **March 2023 Temporary suspension**: In a significant move reflecting industry supply considerations, MNRE put ALMM on hold for 1 (one) year. An OM dated <u>May 10, 2023</u>, announced that the ALMM Order (for modules) is *"held in abeyance for one financial year, i.e. FY 2023-24."*. This meant that solar projects commissioned by March 31, 2024, were exempted from the ALMM module procurement requirement. This pause was likely aimed at relieving supply constraints or high costs.
- 4. Early 2024 Reinstatement and refocusing: As FY 2023-24 drew to a close, MNRE prepared to reimpose ALMM from April 2024, but with some refinements. On February 9, 2024, an order was issued stating that ALMM for modules would again be mandatory w.e.f. April 1, 2024. This directive sought to narrow the scope of ALMM to its original intent (government and subsidized projects only). MNRE signalled that purely commercial projects without government support would be out of ALMM's ambit going forward.
- 5. However, shortly after, on February 15, 2024, MNRE put this re-imposition order on hold until further notice.
- 6. Ultimately, MNRE did confirm the end of the ALMM suspension through a clarification on <u>March 29, 2024</u>, stating that the ALMM (List-I for modules) would come back into effect from April 1, 2024 (after the 1 (one) year hiatus). Specific proposal to permanently exclude open access and captive projects was not formally enacted (since the February 9th order was suspended).
- 7. As of April 2024, the ALMM requirement for modules is in force generally for Government, open access, and netmetered projects as per the earlier framework.
- 8. **Mid/Late 2024 Additional exemptions and reforms**: In <u>May 2024</u>, MNRE issued an order providing a special exemption for renewable energy projects dedicated to green hydrogen production. Specifically, any solar/wind plants located in a Special Economic Zone ("**SEZ**") or Export Oriented Unit ("**EOU**") that supply power exclusively to an electrolyser facility (for green hydrogen or its derivatives) located within an SEZ/EOU are exempted from ALMM requirements until December 31, 2030.
- 9. October 2024 Reiteration of exemptions: On October 14, 2024, MNRE issued a clarification essentially reiterating the earlier exemption for open access and net-metering projects with prior approvals (pre-October 1, 2022).
- 10. Mid 2025: On May 16, 2025, MNRE confirmed that behind-the-meter captive plants owned by Government entities or public sector undertakings have never been exempt from ALMM modules (List I). On July 10, 2025, MNRE issued a clarification on applicability to Government/ public sector undertaking behind-the-meter solar projects commissioned before and after June 1, 2026. For projects commissioned after June 1, 2026, MNRE mandates usage of ALMM cells. For projects commissioned before June 1, 2026, MNRE exempts usage of ALMM cells.

Future Outlook - ALMM List-II (Solar PV Cells)

- One major development as of late 2024 is MNRE's plan to finally operationalise ALMM List II for solar cells. Although the 2019 ALMM Order envisioned an effective List-II alongside List - I, in practice no List-II was launched for years. The reason was that India's domestic solar cell manufacturing capacity was insufficient to meet demand. ALMM thus focused on modules (List-I) while developers were free to import solar cells for use in domestic module assembly.
- 2. By 2024, with Government incentives spurring new cell factories, MNRE determined that List-II can be implemented in the near future. An amendment announced in late 2024 sets a timeline: ALMM List-II (Approved List of solar PV cell manufacturers) will come into effect from June 1, 2026. This lead time gives cell manufacturers a window to ramp up and obtain BIS certification and ALMM listing.
- 3. When List-II becomes effective the ALMM policy will require that any solar module used in an ALMM-mandated project must be made with solar cells sourced from ALMM List-II manufacturers.

4. By mid-2026, India intends to have ALMM fully spanning the solar supply chain. This will ensure both modules and the key components (cells) are used in government facilitated projects.

Compliance of ALMM requirements for manufacturers

For manufacturers, getting onto the ALMM List is a detailed process aimed at verifying both quality and genuine manufacturing capability *viz*:

- 1. **BIS certification**: A manufacturer must first obtain **BIS registration/certification for each model** of PV module or cell it wants to list. This refers to the compulsory product certification scheme under the 'Solar Photovoltaics Systems, Devices and Components Goods (Requirements for Compulsory Registration) Order, 2017'.
- 2. **Application**: The manufacturer must submit an application in the prescribed format for each model along with an application fee and documentary evidence of its financial and manufacturing capabilities for the past 3 (three) years (or since inception, if newer). This includes data on raw material purchases, production output, sales, and financial statements (P&L, balance sheet). In 2023 MNRE revamped application/inspection fees (scaled to nameplate capacity) and set a uniform 2 (two) year validity for all listings (so that adding models does not extend expiry).
- 3. **Preliminary assessment:** MNRE examines the documents and may conduct a preliminary verification especially for new or foreign applicants where domestic filings are not available. If a unit operates outside Indian jurisdiction (e.g. a foreign module maker applying for ALMM) and necessary data isn't otherwise verifiable, MNRE can do an initial inspection to confirm the existence and operations of the factory.
- 4. **Factory inspection**: Before enlistment, a team from MNRE (or an authorized agency, such as NISE) conducts a thorough inspection of the manufacturing facility.
- 5. **Enlistment decision**: If all criteria are met MNRE issues an order enlisting the model and manufacturer in ALMM List-I or II as applicable.
- 6. **Validity and renewal**: The ALMM enlistment initially lasts 2 (two) years after which a manufacturer must apply for renewal to stay on the list. Renewal involves showing continued satisfactory performance of the products i.e. providing updated documents, evidence of quality maintenance and fresh inspection etc.
- 7. **Oversight and removal:** MNRE retains the right to conduct random audits, quality tests, and inspections at any time on ALMM-listed companies. If an enlisted manufacturer is found non-compliant, for instance, product quality issues, failure to meet standards, or evidence that they are outsourcing production contrary to ALMM's intent, MNRE can remove (delist) the manufacturer/model from the ALMM.

Therefore, manufacturers seeking ALMM listing must prove their credibility (via certifications and audits) and continually comply with monitoring.

Conclusion

ALMM has become a cornerstone of India's renewable energy procurement policy, marrying quality assurance with an implicit industrial policy to boost domestic manufacturing. For project developers and EPC contractors, ALMM compliance is now a critical checkpoint.

Clean Energy & Climate Change Practice

Our team's climate change and sustainability practise is regarded as a leading specialized practice acknowledged for its domain knowledge, multi-dimensional expertise and strengths in grappling with complex issues involving public policy, economics, technology, finance, project management besides law. The practice is handled by domain expertise-based team which has advised various stakeholders in renewable energy, electric mobility, energy efficiency, carbon markets, ESG and new and emerging low carbon technologies, including green hydrogen. The team is highly ranked by various legal ranking agencies and is credited for contributing to several landmark and precedent setting projects. This practice encompasses:

- Legislative, Regulatory and Policy reforms;
- Public Procurement;
- Compliance and Strategy;
- Transactional advice including mergers and acquisitions, project finance, structuring legal, regulatory and contractual frameworks.
- ESG compliance, Carbon Markets and nature-based projects

This Prism has been prepared by:



Partner



Gayatri Aryan Principal Associate

JSA Prism | Energy





7 Ranked Practices,

21 Ranked Lawyers



B BENCHMARK

TOP TIER FIRM

2025

8 Practices and

10 Ranked Lawyers

Highly Recommended in 5 Cities



TOP TIER FIRM

Legal500

ASIA PACIFIC

2025

12 Ranked Lawyers



12 Practices and 50 Ranked Lawyers



Recognised in World's 100 best competition practices of 2025



Ranked Among Top 5 Law Firms in India for ESG Practice



Ranked #1 Best Law Firms to Work

Top 10 Best Law Firms for Women

18 Practices and 41 Ranked Lawyers



20 Practices and 22 Ranked Lawyers



Among Best Overall Law Firms in India and 14 Ranked Practices

9 winning Deals in IBLJ Deals of the Year

11 A List Lawyers in IBLJ A-List - 2025 Asia M&A Ranking 2024 – Tier 1

Employer of Choice 2024

Energy and Resources Law Firm of the Year 2024

Litigation Law Firm of the Year 2024

Innovative Technologies Law Firm of the Year 2023

Banking & Financial Services Law Firm of the Year 2022

For more details, please contact km@jsalaw.com

www.jsalaw.com



Ahmedabad | Bengaluru | Chennai | Gurugram | Hyderabad | Mumbai | New Delhi



This Prism is not an advertisement or any form of solicitation and should not be construed as such. This Prism has been prepared for general information purposes only. Nothing in this Prism constitutes professional advice or a legal opinion. You should obtain appropriate professional advice before making any business, legal or other decisions. JSA and the authors of this Prism disclaim all and any liability to any person who takes any decision based on this publication.