



**AAR: Solar Power Generating System classifiable under HSN 8451; Solar Panel, Inverter, Controller, Battery its essential-components**

UP AAR opines that the combination of solar panel, solar battery and charge controller may qualify as “Solar Power Generating System” and supply of the said items would be covered under "Solar Power Generating System” as a whole, and holds that such supply will be treated as composite supply; Notes that the Applicant is engaged in manufacture of Lead Acid Battery and these batteries can be used in solar module, inverter and rickshaw; Further holding that the HSN of Solar Power Generating System is 8541 as claimed by the Applicant, proceeds to examine what constitutes solar power generating system under Chapter 85, what its various components are and the technical requirements that together constitute solar power energy generating system; In this regard, relies on Uttarakhand AAR’s observation in Eapro Global Ltd. [TS Citation] wherein it was held that the four main components of solar power generating system shall be solar panels, inverters, controller and battery, and highlights that the Ministry of New and Renewable Energy in various instances has also approved entire BOQ consisting of various parts e.g. cables, module, monitoring structures, spares, etc as essentials of the solar power generating system; Therefore, holds that “Solar Panel, Inverter, Controller and Battery are essential components of Solar Power Generating System”, but also clarifies that “...cable & monitoring structures are supplementary components...”.



**Mohan & Chandrasekhar**  
**Chartered Accountants**

---