

Frequently Asked Questions on Feed-in Tariff (FiT)

Q	What is Feed-in Tariff (FiT)?
A	<p>Feed-in Tariff, or in short FiT, is Malaysia's new policy mechanism under the National Renewable Policy and Action Plan to catalyse generation of renewable energy (RE), whereby the maximum RE system for each installation is 30 MW in power capacity size. This mechanism allows electricity produced from indigenous renewable energy resources to be sold to power utilities at a fixed premium price for a specific duration.</p> <p>FiT is to be introduced in Malaysia through a new legislation, proposed to be tabled before the Parliament by end of 2010.</p>
Q	How does FiT work?
A	<p>The basic concept of feed-in tariff is that the electricity distributor (TNB/SESB) pays the renewable energy power generator a premium tariff for green electricity that is generated. This allows RE developers to sell their green electricity to the distributor (TNB/SESB) for a fixed number of years; the duration is dictated by the type of renewable energy technology used for power generation. The incentive provides a fixed payment from the renewable electricity supplier for every kilowatt hour (kWh) of electricity generated and exported to the grid.</p>
Q	When will the FiT be introduced?
A	At earliest, in the second quarter of 2011.
Q	How can I apply for the FiT?
A	Application will be web-based and on a complete submission basis for the available quota. Detailed application guidelines and quota will be made available prior to the launch of FiT.
Q	What can I prepare prior to the start of FiT?
A	<p>You can finalize all information and details for your proposed RE plant, such as location, system design, approvals, financing, nearest interconnection point, etc.</p> <p>Please ensure that the RE systems complies with all local and technical requirements. For example, a PV system needs to be designed and installed by a Registered PV Service Provider (PVSP) while the PV modules and inverters shall have IEC certifications.</p>
Q	Could you explain what does "displaced cost of electricity" mean and what does it mean to me? Do I have to deduct this from the indicated FiT rate to get my tariff?
A	<p>The displaced cost of electricity is only relevant to electricity distributors such as TNB and SESB. The displaced cost is the average cost of generating and supplying electricity through the utility's supply line and up to the point of interconnection with the renewable energy systems. It will not affect RE developers and NO, you do not have to deduct this from your FiT rates. On a monthly basis, the distributor will claim the positive difference between the FiT payment and the displaced cost, for all RE generated power from the RE Authority (SEDA).</p>

Q	What if I am a current SREP developer with an existing plant in operation? Can I apply for the FiT?
A	Yes, you will be eligible for the FiT but you will need to re-apply for the FiT and re-sign a new REPPA. However your license period will be adjusted accordingly taking into account the number of years your plant has been operating.
Q	I have received grants as capital investment to construct a biogas plant. Will I still be eligible for FiT?
A	All potential RE developers will have to declare all incentives received when filing the online application and eligibility for FiTs for those with existing incentives such as capital grants will be reviewed on a case by case basis to ensure fairness and transparency.
Q	I do not wish to have the FiT but I am an existing SREP developer. Is this ok?
A	Yes, you may proceed with your current REPPA.
Q	Am I still eligible for the FiT if I am a SURIA 1000 incentives recipient? Do I need to do anything or will my system migrate automatically into a FiT based system?
A	Yes, you will still be eligible for FiT but no, migration is not automatic. You will need to apply for the FiT. Detailed information on the application procedures will be published prior to the launch of FiT programme.
Q	I understand that for me to be eligible for the FiT, I will need to re-apply for it even though I am already having a net-metering account with TNB for my solar PV installation. How do I do this?
A	It is recommended that you engage your PVSP (service provider) to do it on your behalf. The PVSP may impose a service fee.
Q	Would the other government fiscal incentives (such as those announced under Budget 2008 & 2009 – double tax allowances, waiver of import duty & sales tax) still be applicable for FiT recipients?
A	Government fiscal incentives such as claims on investment tax allowance and waiver of import duty and sales tax are due to expire on 31 December 2010. Their continuation beyond that date will be known in the National Budget Speech for the year 2011 later this year. However, the fiscal benefits for GBI certified buildings will continue till 31 December 2014.
Q	Which RE resources are eligible?
A	The following indigenous RE resources will be eligible for FiT: <ul style="list-style-type: none"> ▪ Biomass (from plantation, agriculture, forestry residues, solid waste); ▪ Biogas (from plantation, agriculture, forestry residues, animal waste, landfill gas, sewage gas); ▪ Mini-hydro; ▪ Solar PV.
Q	What about solar thermal? Is it eligible for FiT?
A	No, there is no FiT for solar thermal yet. However, this can be included in the future once

	the technical and commercial viability of the technology in Malaysia can be proven.
Q	What about wind and geothermal? Will there be a FiT for these two energy sources?
A	<p>Initially FiT will not be offered for wind and geothermal when the FiT is launched in 2011 as the resources potential of wind and geothermal have yet to be fully ascertained. The Ministry of Science, Technology and Innovation through SIRIM Berhad is still undertaking a study to identify the resource potential for wind in the country while the Ministry of Natural Resources and Environment will soon be commissioning a feasibility study on the potential of power generation from geothermal in the state of Sabah.</p> <p>The decision on which RE technology to be made eligible for FiT is depending on the potential and viability of the technology and RE resources in Malaysia. FiT is not intended to finance research and development of RE technologies which could be funded by R&D grants or incentives.</p>
Q	How can I be the first to apply for FiT?
A	<p>The FiT system works on the basis of first successful applications via the web portal to ensure fairness and transparency. Further detail on the procedure and required documentation will be published in due time.</p> <p>At the start of FiT, a special allocation will be offered to existing RE installations. Existing means parties with signed REPPAs or having net-metering accounts with electricity distributors. Other parties who are currently constructing their RE plants or systems but without the REPPA or net-meter account would be considered as new FiT applicants.</p>
Q	Will existing players be given first priority for FiT?
A	Yes, priority will be given to existing RE developers with a signed REPPA or those who have a TNB contract (for PV) signed/stamped. However, the priority application period is only limited to the first 3 months once FiT is launched and existing REPPA/contract holders are encouraged to reapply over the given period of time.
Q	What happens if I fail to apply during the first 3 months allocated for those with a REPPA or a TNB contract (for PV)?
A	You will have to apply in the next application period together with ALL other interested parties.
Q	Where can I apply?
A	Application is available via a web portal. All applications have to be made via service providers who are registered with the RE Authority (SEDA).
Q	What are the FiT rates?

A These FIT rates are indicative only and subject to final confirmation upon enactment of the RE Law				
<i>Renewable energy technology</i>	<i>Capacity of renewable energy installation</i>	<i>Feed-In-Tariff rate (RM-Sen)</i>	<i>Effective period</i>	<i>Initial annual degression rate</i>
Biogas	• Installed capacity up to and including 4 MW	32.00	16 years	0.50%
	• Installed capacity above 4 MW, and up to and including 10 MW	30.00	16 years	0.50%
	• Installed capacity above 10 MW, and up to and including 30 MW	28.00	16 years	0.50%
	• Additional for use of gas engine technology with electrical efficiency of above 40%	+2.00	16 years	0.50%
	• Additional for use of locally manufactured or assembled gas engine technology	+1.00	16 years	0.50%
	• Additional for use of landfill or sewage gas as fuel source	+10.00	16 years	1.80%
Biomass	• Installed capacity up to and including 10 MW	31.00	16 years	0.50%
	• Installed capacity above 10 MW, and up to and including 20 MW	29.00	16 years	0.50%
	• Installed capacity above 20 MW, and up to and including 30 MW	27.00	16 years	0.50%
	• Additional for use of gasification technology	+2.00	16 years	0.50%
	• Additional for use of steam-based electricity generating systems with overall efficiency of above 14%	+1.00	16 years	0.50%
	• Additional for use of locally manufactured or assembled gasification technology	+1.00	16 years	0.50%
	• Additional for use of municipal solid waste as fuel source	+10.00	16 years	1.80%
Small hydropower	• Installed capacity up to and including 10 MW	24.00	21 years	0%
	• Installed capacity above 10 MW, and up to and including 30 MW	23.00	21 years	0%
Solar photovoltaic	• Installed capacity up to and including 4 kWp	123.00	21 years	8.00%
	• Installed capacity above 4 kWp, and up to and including 24 kWp	120.00	21 years	8.00%
	• Installed capacity above 24 kWp, and up to and including 72 kWp	118.00	21 years	8.00%
	• Installed capacity above 72 kWp, and up to and including 1 MWp	114.00	21 years	8.00%
	• Installed capacity above 1 MWp, and up to and including 10 MWp	95.00	21 years	8.00%
	• Installed capacity above 10 MWp, and up to and including 30 MWp	85.00	21 years	8.00%
	• Additional for installation in buildings or	+26.00	21 years	8.00%

	<ul style="list-style-type: none"> building structures Additional for use as building materials Additional for use of locally manufactured or assembled solar photovoltaic modules Additional for use of locally manufactured or assembled solar inverters 	+25.00	21 years	8.00%			
		+3.00	21 years	8.00%			
		+1.00	21 years	8.00%			
Q	How will I know if I am successful in my FiT application?						
A	You will be notified electronically if you are successful or otherwise.						
Q	I am a foreign investor and am interested to apply for the FiT. Am I eligible? What are the requirements for foreigners?						
A	Yes, you are eligible but the foreign equity shareholding is capped at a maximum rate of 49% (subject to change).						
Q	I am interested in applying for the FiT for my house in future (solar PV). Can I apply more than once if I decide to expand the system size in future?						
A	Yes, you may do so but your rates will vary according to the year the system is commissioned according to the prevailing FiT rates.						
Q	Who will oversee the running of the FiT?						
A	The Sustainable Energy Development Authority (SEDA), which is a statutory body under the Ministry of Energy, Green Technology and Water will be established under the Act of Parliament to oversee the implementation of the FiT.						
Q	How about guidelines for applications? Will there be any guidelines available for potential developers?						
A	Yes, guidelines will be made available for easy reference but this will be web-based and downloadable before the launch of the FiT.						
Q	What sort of capacities of renewable energy can we expect once FiT is launched?						
A	In the first few years, the following are the indicative minimum RE cumulative capacities*:						
	Year	Biomass (MW)	Biogas (MW)	Mini-Hydro (MW)	Solar PV (MW)	Solid Waste (MW)	Annual Total (MW)
	2011	110.00	20.00	60.00	9.00	20.00	219.00
	2012	150.00	35.00	110.00	20.00	50.00	365.00
	2013	200.00	50.00	170.00	33.00	90.00	543.00
	2014	260.00	75.00	230.00	48.00	140.00	753.00
	2015	330.00	100.00	290.00	65.00	200.00	985.00
	*Note: Figures above are indicative figures used for planning purposes and are not final.						
	The long-term cumulative capacity targets are as shown below:						

Year	Cumulative RE Capacity					
	Biomass	Biogas	Mini-Hydro	Solar PV	Solid Waste	Total
2020	800 MW	240 MW	490 MW	190 MW	360 MW	2,080 MW
2030	1,340 MW	410 MW	490 MW	1,370 MW	390 MW	4,000 MW
2050	1,340 MW	410 MW	490 MW	18,700 MW	430 MW	21,370 MW

Q	Are there limits for RE capacity for individual and company applicant?
A	Yes, the capacity limits will be shared between the various categories of applicants. The details will be disclosed at a later date closer to the time before FiT is launched.
Q	Will there be a feedback session with the public on the FiT?
A	Yes, a session will be held to inform the public and stakeholders on the FiT mechanism before it is launched.
Q	How much PV capacity can an applicant seek to install and how will the applications be treated?
A	<p>Applicants can apply for any capacity that they wish to install but the capacity that can be approved will depend on the total capacity that is allocated on the annual and quarterly basis for each of the respective RE technologies concerned. Each tranche of capacity allocation, especially for PV, may be divided further according to the applicant classification such as residential, commercial industrial or utility (IPP).</p> <p>All applications will be treated transparently and on equal basis according to the category of the installation such as residential, commercial, industrial, or power plant type, and whether they are roof or facade mounted, or ground mounted.</p>
Q	Will Malaysia cap its capacity of RE, i.e. 9MW PV generation in Year 2011 for the FiT?
A	Yes, Malaysia has to cap the various RE technologies from the very beginning to keep the costs within the projected funding capability once the FiT mechanism starts, and depending on the magnitude of the funding revenue that can be generated.
Q	How is the total RE capacity allocated, for example capacity of solar is only 9 MW (versus total of 219 MW) in the year 2011. Is there any reason to allocate a tiny part of total RE generated power to solar generation?
A	The proposed capacity limits are set according to various factors such as the local capability, technology availability, source of technology, resources potential, cost of FiT, etc. Solar energy will play the most significant role for Malaysia's energy security in the long-term. Initially, the FiT is aimed to encourage market development so that grid-parity can be achieved in immediate future, while balancing within the higher cost of FiT for solar PV.
Q	Is Malaysia concerned on the potential burden caused by PV generation to the transmission line hence the rather low cap on solar PV generated power targets under FiT?

A	No, it is not a question of any limitation of transmission line capacities but more on the limits of funding in paying out the relatively higher FiT rates for PV power generation.
Q	What happens if I decide to shift or sell my house? Can I transfer my REPPA to the new owners?
A	Yes, you may do so and the REPPA has to be transferred to the new owner as well, which will require agreement from all parties concerned.
Q	Will there be an application fee?
A	Yes, an application fee will be imposed for each application. The fees will be announced in due time.
Q	What is a 'degression'? What does it mean and why is there a need for one?
A	<p>Tariff degression refers to the annual reduction of the FiT rates. The rate of reduction depends on the maturity and the existing cost reduction potential. Tariff degression applies to all RE technologies and will only affect RE developers every time they come into new agreements with the distributor (TNB/SESB).</p> <p>For example, a home owner (A) installs a solar PV system in year 1 and signs an agreement with TNB at a FiT rate of RM1.75 per kWh. Home owner (A) will continue to receive this rate throughout his/her agreement duration of 21 yrs. A year after home owner (A) installs the system, his/her neighbor, (B) decides to install a PV system in his/her home too. By year 2 the FiT rate has now reduced by 8% to RM1.61 per kWh. Therefore, home owner (B) will now have a 21-year contract with TNB selling their PV electricity at RM1.61 per kWh. This form of degression rewards the early movers of RE in the country and also promotes cost reduction of the RE technology.</p>
Q	Is there a consultant who could help me verify my technical designs before I submit them?
A	<p>The Authority (SEDA) will provide directory of service providers (SPs) that are registered with the Authority. However, the Authority does not take any responsibility of the service providers' conduct, although the registration aims to uphold a minimum quality standard of the services and products.</p> <p>Note: All potential RE developers are required to engage one of the SPs registered with the Authority (or register themselves as the SPs). The requirement to register as SPs would be announced in due time. For solar PV, the current Approved PV Service Providers (APVSP) scheme forms the basis of the SP registration.</p>
Q	What are the measures to ensure funds allocated for the FiT programme is managed appropriately?
A	The management of the fund will be under the supervision of the Authority which will have to report to the Parliament every year. Other measures include transparency in disclosing and publishing of financial reports on funding receipts, funding disbursement to FiT recipients, administrative fees payable to the utility and authority. The accounts of the agency will be presented to Parliament as is required for all such authorities and be subject to Government Audit.

Q	How is the FiT programme financed by the Government?
A	The FiT scheme is not financed by the Government. Instead it will be financed by the electricity consumers themselves who will contribute a very small percentage of their total electricity bills (less than RM0.04 for every kWh consumed, totalling to about 1%-2% of annual utility's sales revenue) when the utility tariff is revised in due course. However, those consumers who consume 200 units of electricity or less will be exempted from this contribution. In return, all electricity consumers have equal opportunity to install solar PV systems at their houses to recover the financing and generate a passive income.
Q	How long does it take for the application to be processed?
A	Assuming all documents submitted are in order, each applicant can expect a result almost immediately.
Q	I have received a notification from the Authority stating I have been successful in my application. What next?
A	Download and complete the public generation license application form from the web portal, send it to the Energy Commission (Suruhanjaya Tenaga, ST). At the same time, download a copy of the standard Renewable Energy Power Purchase Agreement (REPPA) and submit it to the distributor (TNB/SESB).
Q	I have submitted my license application to ST. How long does it take for them to process it and how will I know if my submission was accepted?
A	Again, assuming all documents are submitted in order, ST will take approximately 4 weeks (subject to change) to process your application. Once approved, you will be notified by ST of the result.
Q	Our company is keen to have a PV system at our manufacturing plant now before the FiT is launched. What steps must we take?
A	<p>Step 1: Engage an Approved PV Service Provider (APVSP) to design the PV system including point of interconnection. The interconnection point can be simply 230V or 400V multiple points depending the type of inverter that you will use and the capacity of the system installed. The list of APVSPs is available at www.mbipv.net.my.</p> <p>Step 2: Get the APVSP to submit the relevant information to RE/MBIPV National Project Team. APVSP must also fill in the license application form. Net-meter contract is not applicable in this case (for industry category) as the PV system would generate the electricity for own use. When FiT is launched, the owner would have to apply for FiT as a new applicant.</p> <p>Step 3: Before commissioning, the APVSP must notify the relevant authority for appointment of testing and commissioning.</p>
Q	Can you share with me the expectations of the Authority for application in terms of documentation required?
A	Only the registered service provider can submit your application on your behalf. However, you will be issued a username and password to view your online application. You will have to provide your SP info such as identification card number, address, location, etc and for companies, info such as company registration number is required.

	<p>Applications will only be accepted if submitted with the required documentation* as follows:</p> <ul style="list-style-type: none"> ▪ Information of applicant; ▪ Information of site; ▪ Technical specifications and schematic diagrams; ▪ Work plan; ▪ Possible source of financing (IRR, equity, loan rates, etc); ▪ Fuel source agreement (if applicable); ▪ Requirement for approving permits by authorities (DOE, DOSH, State, Local Government); ▪ Other supporting technical documentations (equipment, machinery, etc). <p>*Note: This is not the final requirement and may include other necessary documentation at the point of time when FiT is launched.</p>
Q	How does the Authority know if a person is a genuine applicant and not just intending to book the capacities for the resale market?
A	While the authority cannot control this, the Authority would require detailed submission for every FiT application. This is expected to deter non genuine party as there will be a high amount of work to do just to submit for the FiT application. All applications upon submission are required to pay online processing fee. Penalties will also be imposed if applicant is found to falsify any information. The FiT also cannot be transferred without approval from the Authority.
Q	Will there be any special bank financing available for capital investment for individual/company? If so, please provide the details.
A	Yes there will be special bank financing available, details for financing RE capital investment will be made available in the near future on the Authority's web portal. However, prospective applicants can choose to use their own banks to finance their investment in RE projects.
Q	I hear many people talk about grid parity. What does it mean and does it have anything to do with us here in Malaysia?
A	Grid parity" means, in relation to a particular renewable energy installation, the time at which the cost of generating renewable energy from that renewable energy installation is equal to or cheaper than the displaced cost. Yes, even though our electricity is subsidized in Malaysia, grid parity is still valid for us as we will one day reach grid parity for different RE technologies. Those countries with subsidised energy markets will reach grid parity at a later stage than those without subsidies.
Q	What is the impact of CO2 emission avoidance as a result of implementing the FiT?
A	The FiT could, on a cumulative basis, avoid 42 million and 145 million tonnes of CO ₂ from the power generation sector by 2020 and 2030, respectively. This will be achieved when the country generates at least 2,000 MW and 4,000 MW (see table below) through the FiT.

Year	Cumulative RE Capacity					
	Biomass	Biogas	Mini-Hydro	Solar PV	Solid Waste	Total
2020	800 MW	240 MW	490 MW	190 MW	360 MW	2,080 MW
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Q	For Double Tax Relief (DTR), if a commercial entity applies to MIDA this year but commissions the solar PV system middle of next year (new building) would they be awarded the tax exemption?
A	The fiscal incentives (ITA) or DTR, is currently applicable for all applications made before 31 st December 2010. Successful applicants are given a 1 year period for the implementation of the project. Hence if your application is submitted before that date you can implement the project later but within the allowed time frame.
Q	If an RE developer were to set up the infrastructure and procurement for solar PV power plant this year, and the solar farm is commissioned middle of next year, would they still be eligible for double tax relief (application for ITA to be submitted this year 2010)?
A	Under the present incentives regime, you should be eligible for the ITA incentives for setting up a solar PV farm.
Q	My company is located in an area where NUR (Northern Utility) is the distributor. Will I be eligible for the FiT?
A	Yes, you are eligible for FiT whereby NUR is the distributor, same like TNB or SESB. You will need to sign a REPPA with NUR as well.
Q	What is a REPPA and how do I obtain it?
A	REPPA stands for the Renewable Energy Power Purchase Agreement and it is a legal contract between the potential RE developer and the distributor (TNB or SESB). Potential RE developers will be able to download a standard REPPA from the FiT Authority website in future.
Q	I heard there will be a minimum energy performance clause for RE developers when FiT starts. Is this true? What does this mean?
A	Yes, this is true. This means that RE developers must guarantee security of supply for TNB/SESB at 80% of the declared energy yield based on the average annual output. Developers who fail to comply will be imposed a penalty by the distributors under the REPPA. This performance clause is however exempted for small systems (those connected at LV).
Q	Why has Malaysia chosen the FiT? Are there any other countries with the FiT system?
A	Malaysia has chosen the FiT because over significant number of years, the FiT has proven to be powerful and efficient in developing sustainable markets for RE, provided the FiT is implemented effectively. The concept of FiT is simple and has low administrative costs making it a highly effective tool for boosting RE. As an example, Germany is the first country

	<p>which successfully implemented the feed-in tariff under their German Renewable Energy Sources Act 2000. In ten years of FiT implementation alone, Germany has been able to increase their RE capacity substantially making them the world leader in RE with an RE contribution of 16.1% to their total electricity consumption in 2009 which created 300,000 green jobs. Germany has not only developed the most dynamic RE and solar PV electricity market but also a flourishing and robust RE industry as a result of the FiT.</p> <p>Many other countries have also implemented the FiT. As of 2009, FiT policies have been enacted in many countries including most of Europe. More than 60 jurisdictions around the world, including in Australia, Brazil, China, Greece, Iran, Israel, the Republic of Korea, South Africa, Taiwan and in some states in the United States. It is gaining momentum in other countries such as India and Mongolia. In South East Asia, Thailand has also implemented the FiT mechanism.</p>
Q	Is TNB supportive of this initiative? Will they take up my generated power from renewable resources?
A	Yes, TNB is supportive of the Government's initiative and yes, they will take up all generated power from renewable resources. Under the RE Law, TNB has to purchase RE generated power with first priority against other conventional power sources.
Q	What if the distributor (TNB/SESB) refuses to purchase all of my RE power?
A	Under the new Renewable Energy Policy, there will be a Renewable Energy Act which among others obliges the distributor to interconnect and purchase all RE generated power failing which a penalty will be imposed on the distributor.
Q	Should I insure my RE system?
A	Yes, it is common practice for RE developers to insure their RE systems and energy yields.
Q	Will there be a requirement for system studies?
A	System studies will be required for all RE systems which are connected to MV or HV connection points. However, the system study requirement shall not cause delay or introduce a barrier for RE systems to be connected to the grid system. Further detail would be disclosed before the implementation of FiT.
Q	Who bears the cost for interconnection?
A	The potential RE developer will have to bear the cost of interconnection but the distributor (TNB/SESB) will bear the cost to upgrade the network (if necessary).
Q	How do I choose my interconnection point for my RE power plant?
A	You can consult the distributor to identify the nearest interconnection point. Should the nearest interconnection point be unable to accommodate a new RE plant (due to existing RE plants reaching maximum limit for the interconnection point), the RE developer is obliged to connect to the next closest interconnection point. The detail and definition of interconnection point shall be disclosed prior to the start of FiT.

Q	What should I expect when FiT starts if my house has a PV system and I am a successful FiT applicant?
A	At the end of the month, your meters will be read (TNB meter and PV meter) by the meter reader and you will be issued 2 bills. One will state the amount of electricity (both in units kWh and RM) you have consumed from TNB and the other will show the amount of electricity your PV system has generated (again both in kWh and the RM). You will have to pay the amount due to TNB for the electricity consumed while TNB will pay you for your PV generated energy. Mode of payment from TNB will be outlined once FiT is launched.
Q	My company is keen to build a 30 MW solar power plant in Malaysia but I understand the maximum allowable capacities per year are far below this making our plan impossible. Is there a possibility for the government to increase the cap for solar PV?
A	At this point, the government has not made a decision to increase the cap for solar PV and will proceed with the planned targets. This is because the fund to pay for the FiT is limited and is sourced from all consumers. We recommend that companies install smaller capacities in the short term and consider installing them by phases if the cap is achieved in the specific application period.

Disclaimer: The answers to the above FAQ are given within the context of the RE Act that will be tabled before the Parliament by the end of this year. RE/MBIPV National RE Project has compiled this in good faith and information above may change without prior notice.