

Federation of Raj Nagar Residents' Welfare Associations

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B.N. Bhat
President

Mukesh Kumar
Treasurer

Mahesh Gaur
General Secretary

Ref No.: FRRWA/Elect/2018

Dated: 31st July 2018

To

The Central Electricity Regulatory commission,
3rd Floor, Chandralok Building, 36, Janpath
New Delhi 110001
Email: 1. secyski@gmail.com; 2. info@cercind.gov.in

Subject: Response to Draft Tariff Regulations & Consultation paper-Period 01.04.2019 to 31.03.2024.

Reference: No. L-1/236/2018/CERC Dated the 24th May' 2018

Handwritten signature and date: 27/7/18, mkyj

1. Refer Para 7.2.5:

The option for fixed charges and variable charges may be adopted. Fixed component to be linked to target availability to the extent of actual availability and fuel charges including taxes duties, transportation.

a) Plant older than 25 years may be removed with supercritical units and life extended suitably but not conservatively. Cost benefit analysis must be made in all cases. Instead of setting up a new Thermal Power plants, the renovation of existing plants/units will be more economical with proper and efficient O&M practices not over expenditure for O&M.

b) Renewable energy generation- Tariff for Renewable Energy shall not exceed the tariff bidding process of Tariff bidding Companies. The forbearance price of RE may be kept below Rs. 4.00/Kwh.

c) Refer Para 7.6.4 (c)-

RE shall not be bundled with Thermal/ Hydel Energy and may be taken separately to avoid inefficiency and overpricing.

2. Refer Para 9.3-

Tariff may be determined for the entire capacity and restricted for recovery to the extent of PPA on provisional basis and the balance capacity may be merchant sale or tied up under section 63 of the EA 2003 as the case may be.

3. Refer Para 11-

Capital cost may be adopted on the input cost, IDC and foreign exchange variations, if any up to COD and cutoff date closing on 31th March of the following year or Six months period whichever is earlier. Interest expenses due to delay in construction and past cut-off date expenses subject to prudence regulatory check only. The Bench marking of capital expenses may not be done in hurry. Data may be

Handwritten notes: Sir, 06/08/18, mkyj

Handwritten notes: E-o/secy, 6/8/18

Handwritten notes: DC/ERP/ETD, 07/08/18