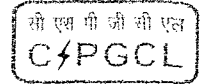


CHHATTISGARH STATE POWER GENERATION COMPANY LIMITED

(A Govt. of C.G. Undertaking)



No. 03-09/REG-01/402

Raipur, Dtd. 14.07.2020

To,

The Secretary
Central Electricity Regulatory Commission
3rd Floor, Chanderlok Building, 86, Janpath
New Delhi- 110001

Email - secy@cercind.gov.in and mmchaudhari@cercind.gov.in

Sub: Submission of comments on Draft Central Electricity Regulatory Commission (Terms and Conditions of Tariff) (Second Amendment) Regulations, 2020.

Ref: Your Public notice no No. L-1 /236/2018/CERC Dtd. 01 June 2020.

Respected Sir,

In reference to Public Notice dtd. 01.06.2020, Chhattisgarh State Power Generation Company Limited (CSPGCL) humbly submits following comments/suggestion for appropriate consideration of the CERC:

1. Amendment no 3.6- Clause (15b).....

“(15b) ‘**Date of Commencement of Production**’ in respect of an integrated mine means the date of touching of coal or lignite, as the case may be, as per the Mining Plan;”

Submission: - In the mining plan, there is no specific date for touching of coal. Moreover, this definition is linked to COD (clause 5.1 (3) c). Hence, this clause may be substituted as

“(15b) ‘**Date of Commencement of Production**’ in respect of an integrated mine means the actual date of touching of coal or lignite, as the case may”.

It is further submitted, that by considering the above change, the condition for Commercial Operation Date proposed in clause 5.1 (3) (c) shall be in line with the condition suggested in “Report of working Group” page 32, Sl no 6.5.3 (b) published in Feb-2020.

2. Amendment no 3.11- Clause (41a)

“(41a) **Loading Point**” in respect of an integrated mine means the location of railway siding or silo for storage of coal or the coal handling plant, whichever is nearest to the mine;”

Submission: - In this definition it is not clear that whether CHP refers to CHP associated with mine or of associated Power Plant. The same may please be suitably clarified.

3. **Amendment no 3.12- clauses Clause (43b)**

(43b) 'Mining Plan' or „Mine Plan" in respect of an integrated mine means a plan prepared in accordance with the provisions of the Mineral Concession Rules, 1960, as amended from time to time and approved under clause (b) of sub-section (2) of section 5 of the Mines & Minerals (Development & Rehabilitation) Act, 1957 by the Central Government, or by the State Government, as the case may be;"

Submission: - Mining Plan includes calendar programme for mining. However, the Allotment Agreement contains schedule for efficiency parameter, which more clearly indicates zero date and milestones precedent to the yearly mining targets. It is therefore proposed that the definition of 'Mining Plan' may include 'Allotment Agreement'.

4. **Amendment No 9- Regulation 10 of the Principal Regulations.**

Submission: - Annexure-I (Part IV) is not available. The same may please be provided.

5. **Amendment No 15.1- Clause 36R. Quality Measurement:**

Submission: As per the clause, the quality of coal is to be measured at Loading Point. The 'Draft model contract agreement for coal mining' published by MOC dtd. 22.04.2015, mentions that coal test is to be done at Delivery Point. Hence, CSPGCL prays for inclusion of following provision:

"Provided that, if the CMSA between the generating company and MDO agrees for Quality measurement at Delivery Point, the same shall also be allowed."

Thanking You

Your's faithfully



**Executive Director (C&RA)
CSPGCL, RAIPUR**