

GUJARAT URJA VIKAS NIGAM LIMITED

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CIN U40109GJ2004SGC045195

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To,
✓ The Secretary
Central Electricity Regulatory Commission
Chanderlok Building,
36 Janpath,
New Delhi – 110001,

Fax no. - 011-23753923

Sub: Staff paper on the “Mechanism for compensation for Competitive Bid Thermal Stations under Change in Law on account of compliance of the revised Emission Standards of MoEF&CC” - Reg.

Sir,

This has reference to Hon’ble CERC’s public notice dated 5.09.2020 inviting views and suggestions on the Staff paper on the “Mechanism for compensation for Competitive Bid Thermal Stations under Change in Law on account of compliance of the revised Emission Standards of MoEF&CC”.

In this regard, the views and suggestions of GUVNL is as under:

- 1) In the staff paper, it is proposed to revise quoted tariff and contracted capacity due to additional Auxiliary Energy Consumption on account of installation whereas additional Auxiliary Energy Consumption in % shall be fixed as per CEA recommendations considering appropriate technology.

Impact of Aux. on following components:

Revised Contracted Capacity (CC revised) = CC original x (1-Aux_{total}) / (1-Aux_{Org})

Revised Quoted Capacity and Energy charge = Quoted Capacity and Energy charge x (1-Aux_{total}) / (1-Aux_{Org})

Where, Aux_{total} = Aux_{Org} + Aux_{ECS}

In this regard, it is to state that the actual increase in Auxiliary consumption due to ECR installation shall vary plant to plant and technology to technology. Further, it may also happen that actual additional consumption may be lesser than CEA recommendations. Therefore, it would be appropriate to consider Additional Auxiliary Consumption recommended by CEA as ceiling and accordingly Aux_{ECS} may be considered of actual additional Auxiliary

consumption due to ECS installation or as per recommendation by CEA whichever is minimum while calculating total Auxiliary calculation and revised quoted tariff & contracted capacity.

2) In the draft paper, Date of Operation (ODe) of the ECS is defined as:

“Date of Operation or Ode in respect of an emission control system means the date putting the emission control system into use after meeting all applicable technical and environment standards, certified through Management Certificate duly signed by an authorized person, not below the level of Director of the generating company”

In the definition, it should be incorporated that certificate from Pollution Control Board where the plant is located certifying that ECS system meets all applicable technical and environment standards as per MOEF&CC rules 2015 shall be mandatory for the certification by the generating company.

Thanking you,

Yours faithfully,


(K. P. Jangid)
General Manager (Comm.)