



Ref.No:- ZCL/CERC/ND/OS/08/10/21/01

8th October 2021.

To
Mr. Sanoj Kumar Jha,
Secretary,
CERC, New Delhi.

Respected Sir,

Sub: Zuari Cement Limited (Formerly Known as M/s Sitapuram Power Limited),
Captive Power Plant – Comments/Suggestions/objections on Draft Central Electricity
Regulatory Commission (Deviation Settlement Mechanism and related matters)
Regulations, 2021 – Reg.

Ref: Your Public Notice No. L-1/260/2021-CERC, Dt: 7th September,2021.

With reference to above notice dated 07-09-2021, please find below our
objections/comments/suggestions:

Clause No's as per Draft Regulation	Description as per Draft Regulation	Comments/Suggestions/Objections
Clause-8: Charges for deviation 8.1: charges for deviation in a time block by a seller shall be payable by such seller as under:	<p>Seller For a general seller other than an RoR Generating station or a generating station based on municipal solid Waste.</p> <p>Deviation by way of over injection (i) Zero up to 2% Deviation-general seller (in %).</p>	<p>(i)We are requesting for the generating stations below 50MW the 2% deviation of over injection is very low % of deviation so we are requesting to increase from 2% to 10% of deviation zero charges for seller (in%).</p>

	<p>(ii) @ 10% of the normal rate of charges for deviation beyond 2% Deviation-general seller (in %).</p> <p>Deviation by way of under injection</p> <p>(i) @ normal rate of charges for deviation up to 2% Deviation-general seller (in %).</p> <p>(ii) @ 110% of the normal rate of charges for deviation beyond 2% Deviation-general seller (in %).</p>	<p>(ii) we request for the over injection units 50% of the normal rate charges to be paid to seller as per Ancillary service charge because as per regulation for under injection the normal rate of charges to be paid for deviation up to 2%.</p> <p>(i) we request for the generating stations below 50MW 2% deviation of under injection is very low % or negligible so we are requesting to increase the deviation % from 2% to 10% and the normal rate of charges only to be collected up to 10% deviation for general seller.</p> <p>(ii) we request for deviation from 2% to 100% also the charges for deviation to be only normal rate of charges because the charges of deviation for a time block shall be equal to the weighted average ancillary device charge (in paise/KWh).</p>
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Please consider our above points in Regulations.

Expecting a favorable action from your end.

Thanking you,

Yours faithfully,
for Zuari Cement Limited

O. SAIUDAYABHANU
Plant Head.

