
Fwd: Public notice dt 13-5-2022 - Staff paper on Methodology for Computatiing 'deterrent changes' for not maintaining coal stocks as per norms specified by CEA.

From : Sunil Kumar Jain <sunil_jain@nic.in> Fri, May 20, 2022 04:26 PM
Subject : Fwd: Public notice dt 13-5-2022 - Staff paper on Methodology for Computatiing 'deterrent changes' for not maintaining coal stocks as per norms specified by CEA.
To : Suman Shiva <shivvasuman@nic.in>

From: "Harpreet Singh Pruthi" <secy@cercind.gov.in>
To: "Sunil Kumar Jain" <sunil_jain@nic.in>
Cc: "sushanta chat" <sushanta_chat@yahoo.com>
Sent: Friday, May 20, 2022 2:44:10 PM
Subject: FW: Public notice dt 13-5-2022 - Staff paper on Methodology for Computatiing 'deterrent changes' for not maintaining coal stocks as per norms specified by CEA.

From: spradvisor@gmail.com <>
Sent: 20 May 2022 12:33
To: Harpreet Singh Pruthi <secy@cercind.gov.in>
Subject: Public notice dt 13-5-2022 - Staff paper on Methodology for Computatiing 'deterrent changes' for not maintaining coal stocks as per norms specified by CEA.

Sir,

At the outset I am of the view that the proposed amendment to Tariff Regulations, 2019 is not necessary for the following reasons :

1. Disincentive for shortfall in normative availability (NAPAF) already exists in the Regulations and further treatment of 20 to 100 % increase based on a specific cause of shortfall is not justified.
2. Hon'ble Commission may have to provide for hedging the risks of Gencos arising out of failures of coal suppliers, defaulting Discoms and also considering the provisions of Grid Code which allow flexibility of Scheduling by Discoms etc.
3. The right course would be to issue Directions by Appropriate Governments to respective Gencos u/s 11(1) of the Electricity Act 2003 to maintain specified coal stocks and maximize generation, while Appropriate Commission compensate for additional costs on account of such Directions as required u/s 11(2) on case to case basis or otherwise.
4. It's seen that Central Government issued Directions u/s in its letter dated 5-5- 2022, which also covers financial aspects which are not authorized under the Act.

In view of the above, I suggest that Hon'ble Commission may drop further proceedings on the Staff Paper so as to avoid possible complications in making and also implementing the proposed amendments to the Tariff Regulations for this purpose.

Regards,

S.Surya Prakasa Rao
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