
Fwd: APMuL Comments - CERC Staff Paper on imported coal blending to mitigate domestic coal shortfall

From : Harpreet Singh Pruthi <secy@cercind.gov.in> Mon, Jun 13, 2022 06:14 PM
Subject : Fwd: APMuL Comments - CERC Staff Paper on imported coal blending to mitigate domestic coal shortfall 📎 2 attachments
To : Awdhesh Kumar Yadav <awdhesh@nic.in>

From: "Chintan Mankad" <Chintan.Mankad@adani.com>
To: "Harpreet Singh Pruthi" <secy@cercind.gov.in>
Cc: "MR Krishnarao" <MR.Krishnarao@adani.com>, "Sameer Ganju" <Sameer.Ganju@adani.com>, "Tanmay Vyas" <Tanmay.Vyas@adani.com>
Sent: Monday, June 13, 2022 3:36:23 PM
Subject: APMuL Comments - CERC Staff Paper on imported coal blending to mitigate domestic coal shortfall

Dear Sir,

With reference to the comments invited by the Hon'ble Commission, on the above-mentioned Notification, we hereby submit our comments on the same with a request to kindly take the same on record.

Thanks and Regards,
Chintan Mankad
Adani Power (Mundra) Limited

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 **APMuL Cover Letter - staff paper imported coal blending - 13.06.2022.pdf**
50 KB

 **APMuL comments - Staff Paper - imported coal blending - 13.06.2022.pdf**
120 KB

Ref.: APMuL/CERC/13062022

Date: 13.06.2022

To

The Secretary,
Central Electricity Regulatory Commission,
3rd and 4th Floor, Chanderlok Building,
36 Janpath, New Delhi – 110001

Sub.: Comments on Staff Paper dated 02.06.2022 on the "Blending of imported coal with domestic coal to mitigate the domestic coal shortage".

Dear Sir,

With reference to the comments invited by the Hon'ble Commission, on the above-mentioned Notification, we hereby submit our comments on the same with a request to kindly take the same on record.

Thanking You,

Yours Sincerely,

For **Adani Power (Mundra) Limited**



Authorized Signatory

Encl: As mentioned above

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APMuL comments on CERC Staff Paper on Blending of imported coal with domestic coal to mitigate the domestic coal shortage

- As per the guidelines of CEA / MoP in vogue domestic coal linkage is being allowed to generating stations only upto 85% of normative requirement. Further, as per the Govt. of India policies in vogue coal linkage for coastal power plants is granted only for 70% of the installed capacity. In addition, as per the SHAKTI policy notified on 22.05.2017 coal supply will be restricted to 75% of the Annual Contracted Quantity (ACQ) under the Fuel Supply Agreements (FSAs). Moreover, it is a fact that grade slippage is an inevitable factor in the coal supplies by Coal India Ltd. Experience shows that the GCV loss is between 10-15% from the allocated grade under the FSA.
- Taking all these factors into consideration which are not in the control of the generating company it is desirable to allow a minimum of 35% blending of imported coal, subject to technical limitations of the power plant.
- Based on the prevailing imported coal price scenario which is around 4-5 times the price of linkage coal, there shall not be any requirement of obtaining permission from the beneficiaries atleast till there is an increase of two times in the Base Energy Charge Rate on account of the blending of imported coal with domestic coal (For e.g. if Rs. 2 is the Base ECR considering pure linkage coal then there shall be no requirement of seeking beneficiary permission till the ECR rate becomes Rs. 4 on account of blending of imported coal.)