

Tata Power Comments on CERC Staff Paper on 'Methodology for Transition from Six- Monthly Escalation Rates to Monthly Escalation Rates for Imported Coal'

S.No.	Clause No.	Comments/Changes Suggested
1.	General Comment	The applicability of the proposed methodology must be considered beyond Section 11 period for Imported Coal Based (ICB) plants. There should also be Option 3 where one can mutually accept the time of transition from Six Monthly to Monthly CERC Escalation considering Sec-11 period.
2.	Para C 9.4	Escalation rate for inland handling of imported coal shall also be considered on Monthly basis as done with other two components in the staff paper.
3.	Para 12 b	Any change in the escalation methodology should also be considered for amendment in existing PPAs.
4.	New comment	Time of notification of monthly escalation should be made at an earliest fixed period of any month.