Email Puneet Arora

Regarding rejecting the Tariff regulations bill

From: raviroy1522000@gmail.com Tue, Feb 20, 2024 11:36 PM

Subject : Regarding rejecting the Tariff regulations bill **To :** Puneet Arora <tariff-reg@cercind.gov.in>

Dear Sir.

Regarding the cited subject, pl.find the comments Comments on Draft Tariff Regulations, 2024

1. The draft regulations mention that 'after previous publication' but these were neither notified in Gazette of India nor provided any publicity b

2. The draft Tariff Regulations with 172 pages, exclusive of forms, issued on 04.01.2024 and the Explanatory Memorandum with 289 pages issu

3. Though the Commission allows majority of claims on the basis of Auditor certificate, instead of detailed scrutiny, the auditors appointed by the

4. As the existing regulations provide for capitalization of IDC and IEDC till the actual COD of the plant, the same is incentivizing the time over

5. The prevailing regulations primarily focuses on existing plants but not the under-construction projects, there is a need to lay down certai

6. Cut-Off date has been keep on increasing from one tariff regulation to other regulation i.e. 2014, Tariff Regulations mention 2 – 3 years, 201

7. As per the Tariff Policy, no new plant is envisaged under section 62 after January, 2011 and these regulations shall not applicable for the plan

8. The prevailing Regulations provides for recovery of 90 % of capital cost (10 % salvage value) within 15 years, but allow equity to be conside

9. In respect of Interest on Working Capital, it is to mention that though the Commission acknowledges that PLF is reducing year on year and p

10. In 2021, the Commission had notified regulations on **determining input price of coal**. Inspite of passing over 2 – 3 years, **certain relax**:

11. In regards to **RoR hydro plants**, it is noticed that while the NAPAF is determined on the basis of all 96 blocks (24 hours) of day for last few

12. In case of transmission, it is noticed that though AFC is determined separately for different assets, the recovery of AFC is computed on cc

13. In regards regulations to consider wage revision for each generating station, it to mention that as the man power is transferred one plant to

14. It is noticed that the 'Power to Relax' and 'Power to Remove Difficulty' have been exercised regularly, without any specific requirement, which is in con

15. The Regulation 103 is 'Issue of Suo-Moto orders and practice directions' is a new regulation in addition to existing 'Power to Relax' and 'Power to Ren