



NABHA POWER LIMITED

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Ref: NPL/PM/CERC/6665

Dated: 28.01.2019

To,
The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi -110001

Sub: Comments on Draft Central Electricity Regulatory Commission (Terms and Conditions of
Tariff) Regulations, 2019 for the tariff period from 1.4.2019 to 31.3.2024.

Dear Sir/Madam,

In reference to the Draft Central Electricity Regulatory Commission (Terms and Conditions of
Tariff) Regulations, 2019 for the tariff period from 1.4.2019 to 31.3.2024, please find enclosed
comments on the same on behalf Nabha Power Limited having 2X700MW Coal fired Thermal Power
Plant at Rajpura, Punjab.

This is for your kind consideration.

Thanking you,
For Nabha Power Ltd

(Authorised Signatory)

Encl: As above.

Wholly Owned Subsidiary of L&T Power Development Limited

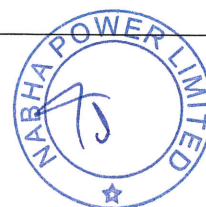
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Regd. Office: P.O.Box no 28, Near Village Nalash, Rajpura - 140401, Punjab

CIN No: U40102PB2007PLC031039

Comments on Draft Central Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2019 for the tariff period from 1.4.2019 to 31.3.2024

| Sr. No. | Clause & Page No. | Clause as per Draft Regulation | Suggestion |
|---------|------------------------|---|--|
| 1 | Clause 1 (31), Page 10 | (31) 'GCV as received' means the GCV of coal or lignite as measured at the unloading point of the thermal generating station through collection, preparation and testing of samples from the loaded wagons, trucks, ropeways, Merry-Go-Round (MGR), belt conveyor and ship in accordance with the IS 436 (Part-1/ Section 1)- 1964: | (31) 'GCV as received' means the GCV of coal or lignite as measured on actual TM basis at the unloading point of the thermal generating station through collection, preparation and testing of samples from the loaded wagons, trucks, ropeways, Merry-Go-Round (MGR), belt conveyor and ship in accordance with the IS 436 (Part-1/ Section 1)- 1964: |
| 2 | Clause 49, Page 93 | Computation of Gross Calorific Value: (1) The gross calorific value for computation of energy charges as per Regulation 52 of these regulations shall be done in accordance with GCV on as received basis. | Computation of Gross Calorific Value: (1) The gross calorific value for computation of energy charges as per Regulation 52 of these regulations shall be done in accordance with GCV as received basis taking in account the actual TM as received at the plant site. |
| 3 | Clause 8 (4), Page 30 | (4) Assets installed for implementation of the revised emission standards shall form part of the existing generation project and tariff thereof shall be determined separately on submission of the completion certificate by the Board of the generating company. | (4) Assets installed for implementation of the revised emission standards shall be covered under Change in Law to form part of the existing generation project and tariff thereof shall be determined separately on submission of the completion certificate by the Board of the generating company. |
| 4 | Clause 1 (5), Page 4 | (5) 'Auxiliary Energy Consumption' or 'AUX' in relation to a period in case of a generating station means the quantum of energy consumed by auxiliary equipment of the generating station, such as the equipment being used for the purpose of operating plant and machinery including switchyard of the generating station and the transformer losses within the generating station, expressed as a percentage of the sum of gross energy generated at the generator terminals of all the units of the generating station: Provided that auxiliary energy consumption shall not include energy consumed for supply of power to housing colony and other facilities at the generating station and the power consumed for construction works at the generating station and integrated coal mine; | Power consumed for construction of Flue Gas Desulphurization plant should be met from auxiliary power consumption with separate metering, as anyway the cost will be a passthrough under Change in Law. This will also reduce cost of temporary additional arrangements required for providing construction power by the Discoms and will reduce the passthrough cost. |
| 5 | Clause 50, Page 94 | 50. Landed Price of Reagent (Limestone, Sodium Bi-Carbonate, Urea and Anhydrous Ammonia etc.): (1) Where the specific reagent such as limestone, Sodium Bi-Carbonate, Urea and Anhydrous Ammonia are used during operation of emission control system, the landed price of such reagents shall be determined based on normative consumption specified in clause (2) of this Regulation and purchase price of the reagent | Specific Consumption of Reagent for wet limestone type:- 15 Gm/Kwh should be considered with 89% purity of Limestone. Further , Aqueous Ammonia reagent should also be considered for NOx control system for selective Non Catalytic reduction |



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| 6 | Clause 52 (b) (3), Page 102 | <p>(3) In case of part or full use of alternative source of fuel supply by coal based thermal generating stations other than as agreed by the generating company and beneficiaries in their power purchase agreement for supply of contracted power on account of shortage of fuel or optimization of economical operation through blending, the use of alternative source of fuel supply shall be permitted to generating station: Provided that in such case, prior permission from beneficiaries shall not be a pre-condition, unless otherwise agreed specifically in the power purchase agreement:</p> <p>Provided further that the weighted average price of use of alternative source of fuel shall not exceed 30% of base price of fuel computed as per clause (7) of this Regulation.</p> <p>Provided also that where the energy charge rate based on weighted average price of use of fuel including alternative source of fuel exceeds 30% of base energy charge rate as approved by the Commission for that year or energy charge rate based on weighted average price of use of fuel including alternative sources of fuel exceeds 20% of energy charge rate based on based on weighted average fuel price for the previous month, whichever is lower shall be considered and in that event, prior consultation with beneficiary shall be made not later than three days in advance.</p> | <p>This capping of 30% or 20% should be removed if the beneficiaries agrees to schedule energy generated from Alternate coal as the same will automatically be taken care under Merit Order Despatch.</p> <p>Generating Stations should not be made responsible for non-availability of coal due to reasons attributable to Coal Company or at least till trigger levels are removed from FSA's by CIL.</p> |
| 7 | General | <p>" Deemed Availability" should be allowed for the "Outage Time" during hook-up period of Emission control equipment which are necessitated to comply with revised MoEF & CC Emission norms , which includes Flue gas desulphurisation system (FGD) and SCR/SNCR</p> | |

