Particulars	Draft CERC Regulations 2019	MPPGCL's Comments/Suggestions	Remark
O&M Expenses definition (Page 14-15)	**3.(48)** O&M expenses' means the expenditure incurred for operation and maintenance of the project, or part thereof, and includes the expenditure on manpower, maintenance, repairs and maintenance spares , consumables, insurance and overheads and fuel other than used for generation of electricity , water charges and **security expenses.**	**3.(48)** O&M expenses' means the expenditure incurred for operation and maintenance of the project, or part thereof, and includes the expenditure on manpower, maintenance, repairs and maintenance spares consumables and ***excludes*** insurance and overheads and fuel other than used for generation of electricity , water charges and **security expenses.**	***Definition under Regulation 3.(48) Page 14-15 needs to be in line with Regulation 35(6) at page 78.*** ***Needs Correction.***
Useful life of Hydro Stations definition (Page 21)	**3.(79) 40 years.**	**3.(79)** ~~**40 years**~~ ***35 years*** **.**	***35 years to be continued***
Determination of tariff for new generating station (Page 32)	**9.(1)** The generating company or the transmission licensee may make an application for determination of tariff for new generating station or unit thereof or the transmission system or element thereof in accordance with the Procedure Regulations within **60 days** of the anticipated date of commercial operation:	**9.(1)** The generating company or the transmission licensee may make an application for determination of tariff for new generating station or unit thereof or the transmission system or element thereof in accordance with the Procedure Regulations within ~~**60 days**~~ ***4 months (prior)*** of the anticipated date of commercial operation:	***Amendment.***
Projected and actual capital expenditure (Page 36)	**10.(8)** Where the capital cost considered in tariff by the Commission on the basis of projected additional capital expenditure exceeds the actual additional capital expenditure incurred on year to year basis by more than **10%,** the generating company or the transmission licensee shall refund to the beneficiaries or the long term transmission customers as the case may be, the tariff recovered corresponding to the additional capital expenditure not incurred, as approved by the Commission, along with interest at **1.20 times** of the bank rate as prevalent on 1st April of the respective year.	**10.(8)** Where the capital cost considered in tariff by the Commission on the basis of projected additional capital expenditure exceeds the actual additional capital expenditure incurred on year to year basis by more than **10%,** the generating company or the transmission licensee shall refund to the beneficiaries or the long term transmission customers as the case may be, the tariff recovered corresponding to the additional capital expenditure not incurred, as approved by the Commission, along with interest at ~~**1.20 times**~~ the bank rate as prevalent on 1st April of the respective year.	***Regulation 10.(8) Page 36 needs to be in line with Regulation 13(4) at page 39.*** ***Deletion.***

Interim True up (Page 38)	**13.(3)** The generating company or the transmission licensee, as the case may be, may make an application for interim truing up of tariff in the year 2021-22, if the annual fixed cost increases by more than **20%** over the annual fixed cost as determined by the Commission for the respective years of the tariff period. Provided that if the actual additional capital expenditure falls short of the projected additional capital expenditure allowed under provisions of Chapter 7 of these regulations, the generating company or the transmission licensee, as the case may be, shall not be required to file any interim true up petition for this purpose and shall refund to the beneficiaries or the long term customers, as the case may be, the excess tariff recovered corresponding to the projected additional capital expenditure not incurred under intimation to the Commission at the bank rate as on 1st April of the respective years. Provided further that the generating company or the transmission licensee shall submit the complete details along with the calculations of the refunds made to the beneficiaries or the long term customers, as the case may be, at the time of true up.	**13.(3)** The generating company or the transmission licensee, as the case may be, may make an application for interim truing up of tariff in the year 2021-22, if the annual fixed cost increases by more than ~~**20%**~~ ***10%*** over the annual fixed cost as determined by the Commission for the respective years of the tariff period. Provided that if the actual additional capital expenditure falls short of the projected additional capital expenditure allowed under provisions of Chapter 7 of these regulations, the generating company or the transmission licensee, as the case may be, shall not be required to file any interim true up petition for this purpose and shall refund to the beneficiaries or the long term customers, as the case may be, the excess tariff recovered corresponding to the projected additional capital expenditure not incurred under intimation to the Commission at the bank rate as on 1st April of the respective years. Provided further that the generating company or the transmission licensee shall submit the complete details along with the calculations of the refunds made to the beneficiaries or the long term customers, as the case may be, at the time of true up.	***Amendment.***
Additional RoE	***No provision.***	***In case of projects commissioned on or after 1st April, 2019, an additional return of 0.5 % on Equity shall be allowed, if such new projects are completed within the timeline.***	***Addition, (as mentioned in earlier Regulations)*** ***Time line needs to be specified.***
Working Capital for thermal power stations shall include (Page 73)	**34.(1)(a)(i)** Cost of coal or lignite and limestone towards stock, if applicable, for 15 days for pit-head generating stations and **20 days for non-pit-head generating stations** for generation corresponding to the normative annual plant availability factor or the maximum coal/lignite stock storage capacity whichever is lower;	**34.(1)(a)(i)** Cost of coal or lignite and limestone towards stock, if applicable, for 15 days for pit-head generating stations and ~~**20**~~ ***30*** **days for non-pit-head generating stations** for generation corresponding to the normative annual plant availability factor or the maximum coal/lignite stock storage capacity whichever is lower;	***Amendments.***

	34.(1)(a)(v) Receivables equivalent to **45 days** of capacity charges and energy charges for sale of electricity calculated on the normative annual plant availability factor;	**34.(1)(a)(v)** Receivables equivalent to ~~**45**~~ ***60*** **days** of capacity charges and energy charges for sale of electricity calculated on the normative annual plant availability factor;	
Working Capital for Hydro power stations shall include (Page 74)	**34.(1)(c)(i)** Receivables equivalent to **45 days** of annual fixed charges	**34.(1)(c)(i)** Receivables equivalent to ~~**45**~~ ***60*** **days** of annual fixed charges	***Amendment.***
PAFM Calculation of Hydro Station (Page 105)	**11.54(3)** The PAFM shall be computed in accordance with the following formula: $PAFM = 10000 \times \Sigma_{i=1}^{N} DCi / \{ N \times IC \times (100 - AUX) \} \%$ Where AUX = Normative auxiliary energy consumption in percentage DCi = Declared capacity (in ex-bus MW) for the ith day of the month which the station can deliver for at least three (3) hours, as certified by the nodal load dispatch centre after the day is over. IC = Installed capacity (in MW) of the complete generating station N = Number of days in the month	**11.54(3)** The PAFM shall be computed in accordance with the following formula: $PAFM = 10000 \times \Sigma_{i=1}^{N} DCi / \{ N \times$ ~~**IC**~~ ***OC*** $\times (100 - AUX) \} \%$ Where AUX = Normative auxiliary energy consumption in percentage DCi = Declared capacity (in ex-bus MW) for the ith day of the month which the station can deliver for at least three (3) hours, as certified by the nodal load dispatch centre after the day is over. OC = Operating capacity (in MW) of the complete generating station is the Maximum power / Load which the plant can generate on that particular reservoir level considering the limitation of water availability. N = Number of days in the month	***Correction.***
Station Heat Rate (Page 125)	**12.59(C)(b)(i) New Thermal Generating Station achieving CoD on or after 01.04.2009.** **.....** Provided also that maximum turbine cycle heat rate shall be adjusted for type of dry cooling system:	**12.59(C)(b)(i) New Thermal Generating Station achieving CoD on or after 01.04.2009.** **.....** Provided also that maximum turbine cycle heat rate shall be adjusted for type of dry cooling system: ***The adjustment should be around 100 kCal/kWh for Dry Air Cooled type Condenser in 660MW Super Critical Unit.***	***Addition.***