

Comment 1

20-02-08 12:12pm

Name: Hiral**City: Ahmedabad****Organisation: paryavaran mitra****Country: India**

1. As mentioned in social well being section, how proposed CDM project will exactly contribute to poverty alleviation? How many skilled/unskilled people will be employed at this project?
2. As INR 897 million will be invested in project, whether cost benefit analysis of project has been carried out for project?
3. List of stakeholders which were present during consultation is not shown in PDD.
4. Stake holder consultation did not include local self government, local villagers or government authority from environment department / pollution control board.
5. Whether local villagers would be beneficiary of CDM revenue earned by company? Any plan has been develop to earmark certain fund from CDM revenue for community welfare?

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Comment 2

12-03-08 5:35am

Name: Naveen**City: Bellary****Organisation: VC Collage****Country: India**

1. The PDD writers seems to be experts in copy paste wherein time and again they clean forget that the 1.25 MW turbine of Suzlon cannot be called as a state of the art technology. Once again for their sake of learning / understanding the internationally accepted definition is reproduced here - The state of the art is the highest level of development, as of a device, technique, or scientific field, achieved at a particular time, I hope that the writer is aware of the fact that Suzlon is producing 1.5 and 2.0 MW turbines, and Vestas (India) is producing 1.65 MW turbines from the time before the start date of this project / turbines implemented for this project. Please stop carrying out a copy paste of stuff.
2. Another master piece of copy paste and painful reading material from previous PDDs which is totally irrelevant with respect to this PDD (Regulatory Barriers)

A) The policy description: The policy description for the state of Gujarat is given right from 1993. How was this related to the investment decision for this project? I don't find a reason that can justify the fact.

B) The comparison of wind power policies for couple of states is furnished which is dated back 2005 (and the data presented is still further old) whereas the PDD has been finalized in February 2008. DOE should at least do a proper preliminary check before web

hosting PDDs.

C) The table on page 13 of PDD presenting Nil installations in few years, well do I need to laugh the way in which the fact has been misrepresented – the gap / years for nil installation is because of cyclone in Gujarat due to which wind turbines collapsed and thus investors refrained from investing in Gujarat and not because of poor policy which has been harped upon. In case again if DOE wants to give benefit of doubt to the policy framework of Gujarat please do a small google search as there are many articles available for them to develop understanding.

3. Generation Risk: Look at the total installations carried out in the state of Gujarat (as per the table presented in the PDD – page 13) and look at the claim made by the PDD writer that 6 turbines have underperformed by 6% - what do I do? A quick smile on the way how twisting of facts has been carried out, how come the PDD writer has not written about the rest of the installations and their respective performances? More so, did any of the investors made investment decision in 2002? And also the other interpretation could be all the investors were aware about those 6 turbines only and were keeping an eye on their performance.

4. In addition to this, higher establishment cost has been stated on page 13. Just to provide some inputs on this

- Why the financial analysis has not been carried out for the project to transparently present the returns? The project must have sought some kind of debt from the market / financial institutes, why those documents are not reproduced here / dicussed in the PDD?

- Hydro operators have to give free electricity to the state government against water royalty, thermal operators have to entail fuel cost whereas none of this is applicable to wind project (no royalty and no fuel cost), beyond this a preferential tariff is provided to them (which is higher than both hydro and thermal projects) – the DOE can easily verify these facts. In case of captive usage of generated electricity, the HT tariff in Gujarat (after incorporating cross subsidy, energy charges and demand charges) is about Rs 4.50 per unit and wind comes out to be cheaper than it. Do you have any justification for this?

5. Wow ! finally a contradiction and a statements made in PDD that favours my observation, please see page 17 of the PDD wherein the PDD writer finally writes the natural disaster i.e. cyclone and thus confirms that investment in the state didn't happened because of policy but because of cyclone for 4 years. The PDD writer does not know that all the turbines were insured, and thus 100% investment was not lost

6. No details of the stakeholder consultation meeting has been furnished, not even the date of the meeting has been mentioned !!!

7. The turbines of Ambuja were implemented in 2004, its looks strange why this company is now applying for CDM support because the investment decision could be dated 2003 or early 2004 its been 4 full years !!!