Comment 1	11-03-08 2:31pm
Name: Babu Jegageevanram	**City: Bhopal**
Organisation: Individual	**Country: India**

The applicablity of the methodology should be assured.

Under section B.3 the PP has shown that the plant was consuming power from the grid,hence it is desirable to know whether the applied methoodlogy is applicablr for grid power replacement.

The FO based system rated capacity to be noted by the DOE and it should ensure that the capacity of the FO based system too is 6 MW if not then the applied methoodlogy is not applicable.

In case if the PP tries to establish that the additional capacity would have been met by Fo based sysem then the combined tools should be used to evaluate the plausible alernatives.

It is evident with the ever increasing cost of the fossil fuels (liquid) and erratic supply of grid power the best available baseline would be the project plant for the PP.

An investment analysis needs to be done for this purpose like the unit cost of electricity through grid,FO,NG.

The investment analysis should also take care of the cost replacement due to installation of WHRB and associated coal reduction in the plant from baseline.

Comment 2	11-03-08 2:44pm
Name: jonathan	**City: Abudhabi**
Organisation: Individual	**Country: UAE**

It is real way of cheating i feel in this project,i have referred a registered PDD in India applying AM0029 wherein the project has mentioned there is plenty of NG available in the WESTERN region whereas this project is stating that the availablity is constrained.So one among the either is wrong statement.If this is correct then the registered PDD is Wrong.

Comment 3	13-03-08 4:50pm
Name: EcoSol	**City: New Delhi**
Organisation: EcoSol	**Country: India**

1. The project has selected only Furnance Oil CPP as baseline, however, description under section A2 says that the project shall reduce fuel consumption from DG sets and Grid also! Same description is given under section of project boundary. Is it really clear to the PP and consultant that exactly what will be displaced and what should be considered as baseline or it is mere a new requirement in view of plant expansion, the KDG unit. Will they not be requiring any additional source of power for their coming up new plant??? is the capacity of FO CPP is same as GAS CPP??? It is a common practice to use Gas CPP (still the PDD says that its first of its kind!, How?), since there is actue shortage of power and the

combined cost of power with own generation (using diesel) and from the grid costs higher than if it is being generated using Gas CHP plant. Calculation can be done to check this common fact.
2. DOE needs to check if it is really a case of III B?
3. Cant the exhaust gases of FO engine be used for steam generation in the boiler??? the generation of steam cannot be considered as additional since the same is also possible using FO engine which are also designed to run on continuous basis as with Gas engines.
4. Section B5 : Check is required to validate in case the gas purchase agreement with GAIL has description about use of Gas power plant or not. Also, the PDD says the start date of project is some future date! But did gas purchase agreement is in agreement with this? It is also worth to note that the gas purchase agreement is as early as 2005! (pg 14, 3 para, 2nd line) Also the consideration regarding this voluntary participation should be prior to submission of application regarding use of gas to GAIL.
5. Boiler description: is the boiler dual fired or only exhaust fired??? in case of dual fired, ofcourse steam generation can be observed but how will it be checked that whether only exhaust gases have been utilized to produce steam.
6. Link on page 7 is not working, also no latest data has been referenced. As under Barrier description on page 13 demand supply gap shall be improving drastically after 2009, and prices may come down. why facts are not been presented for future years? Weak barrier! Also under second barrier FO is also a derivative of similar fuel class and is also subject to fluctuations as the NG. not a strong barrier! Under barrier 3, great contradiction to statement 1, wherein it is claimed that power sector is one of the biggest user of Gas! also it can be checked from GAIL that several other companies have done contracts for power generation in the pithampur region. further, Gas based power plants are proven technology, there is no risk involved in this and when the user is already using captive power plant then surely there is no absolute risk involved as regard to technology risk. Next section says there is no gas based power plant in India!, i think the PDD writer needs to make aware about the plants on Natural Gas. Pragati Power Plant is based in Delhi itself but there are hundreds of plants which are using gas based power for their own use. Further, plant is not supplying power to the grid, then how its a positive addition to state grid? WHRB barrier: same risk of NG is being expanded here. needs to ensure that coal based and FO based boiler (2 boilers) will be shut down during verification.
7. pg 19: 363 days of operation!!! Does only 2 days will be required for maintenance shutdown? It is common practice to consider the max. of 340 days of plant operation. Also, will there be only 4% of Aux. consumption? Justification of the same would be worth to understand.
8. Section C.1.1: in case the project is yet to be implemented than how the PP has made contract with GAIL without actually knowing the use of gas much earlier than submission of the PDD (pg 28 line 1)
9. Project Boundary has so many other GHG emitting sources, have their emission been accounted for under project emissions or while calculating ER.