

Comment 1

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7.5 MW Rice-husk based Power generation of M/s Neeraj Power Pvt. Ltd.

1) DOE to confirm the availability of surplus biomass, by making the field visits from the rice mill in the are of 75 KM which produce surplus rice husk. As per available information in these region many of biomass power plant are planed and some of them are in CDM registration process, which can be affect the availability of surplus biomass. As per available information in this region there is no surplus biomass to long term feeding of these type of biomass power plant, because as per the CDM website it is established the agreements for procurement of surplus biomass from fields are done by others, how the Project Participant manage the procure the surplus biomass, and it is also a great responsibility of DOE to check the biomass is surplus of not. If the PP are going to procure it from Rice Mill then how other project got it and what about there agreement..

2) What rate of biomass is taken in IRR calculations, if it is surplus then it is sure that it will be procured in very nominal cost, then it is cheaper then coal, how PP will claim it is less financial viable comparison to other options.

3) The PDD is not properly use the latest additionality tools, not followed the guidelines of UNFCCC.

d) Prevailing practice comparison with large coal based power plant is not proper. In Chhattisgarh state there are many small-small coal based power plants set up as seem from many WHRB PDDs. The comparison shows that it is a normal and common practice to set up small size power plant in this part of India, according to the available local resource. Therefore this barrier also is not there.

e) The biomass project is if located in the surplus biomass area it is then no additional as it is highly profitable because of high preference given by GOI on the tariff. If the growing prices of biomass are having any barrier then the comparison between the similar size coal based power plant must be made. The growing rates of biomass indicate that there is no surplus biomass hence the project is no additional.25% Leakage as per methodology is not given why?

The information given in PDD dont match and don't satisfy to the above requirement.