

Comment 1

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(1) Prevailing Practice should not be compared with the coal based power plant as this is the coal based area. If the biomass was available to the extent of the coal then it would have been proper. In the CDM process it is customary not to use the restricted issues for any comparison. Rather in Chhattisgarh the combustion of biomass to generate steam is a common practice with all the rice mills from where the Power plant proposes to procure the rice husk. This needs to be carefully compared.

Also large number of biomass based power plants are set up due to the attractive power tariff @ Rs.3.10 per unit. Whereas the coal based power plant get only about 2.00 Rs./unit.

(2) Policy Barrier: there is a very clear mandate of GOI to promote the biomass power. The barrier illustrated have not held up any biomass or coal based power projects, multiyear tariff is not even available to the coal based power. A preferred higher tariff is being paid to the biomass power, as may be compared with the NTPC power tariff and the tariff at other IPP's are able to sell their power in bulk.

(3) Financial barrier: shown due to increasing price of rice husk illustrate that it is not a waste biomass in the region. Also the present power tariff is reported to have been increased from Rs.2.65 to Rs. 3.10. hence there seems to be no financial barrier.

(4) Investment Barrier : The Chhattisgarh state is one of the faster industrializing state. It is indicated with a number of steel plant, power plants already set up and MOU's signed by the Govt. There are highest number of MOU's signed by the State Govt. with Private power producers. The State has very high availability of skilled manpower to operate the size of the power plant. If these are the barrier then how the state govt signed MOU to the extent of over 7000 MW, will be implemented. The clear cut evidence to this should be made available.

In view of the above the barriers illustrated does not seem to be realistic. These need to be reviewed and assessed in consultation with the authorities of Environment, Industrial Department and Energy Department of State Govt. The policy related threat must be verified with the non-conventional energy department, environment and energy department of GOI & state govt. Every party to the protocol is suppose to promote the non GHG industrialization, the policy related barriers stated in PDD if hold good then the UNFCCC should take up the issue with GOI.

(5) The availability of biomass in the area and the actual demand and consumption pattern are not illustrated. The prevailing rates indicate that there may be deep scarcity of biomass in the area, which may lead to deprivation of biomass with the existing consumers. This may lead to the switching over to the coal from biomass leading to increase in the fossil fuel consumption. This is very-very important as the area is reported to be a coal base area,

where coal is reported to be cheaply available. Thus abnormal increase in the rates of Biomass may force the existing users of biomass to switch over to the cheaper fuel Coal (that will lead to GHG emission). Therefore this needs to be studied in detail. DOE to take responsibility that the project does not lead to any secondary leakages.

(6) The technology is well diffused having no technology, finance barrier, if the biomass is a waste material then it should be available at free of cost, in such condition the project activity become financially most attractive. Hence is the baseline.

(7) Environment: the project is based on surplus biomass, which in the absence of the project activity would have been combusted in the fields. What is the surplus how it has been arrived. As per the web site of the chatisagrh govt the district rajnandgaon has large forest area. The rice cultivation is limited. The real impact must be assessed on the environment issues.

(8) The Technology and regulatory barriers are not so forbidden Proposed technology is practiced commonly. The regulatory barrier as indicated are common to any activity in India. No additional barrier for biomass power is shown. Rather lot of incentive and promotion related uncertainties are discussed. Can these be treated as barrier.

(9) Early consideration of CDM is an important document. This should be displayed for international stake holder comments.

(10) In monitoring plant, third party verification and actual supplied quantity of biomass and quality of the same should be better incorporated for transparency.