# Presentation to the Task Force on PS Investment and Reforms Girish Sant Prayas, Energy Group

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## Interaction Plan

- Important features of historical development
- Segmentation due to E-Act
- Specific suggestions
  - Generation planning & investment
  - Competition
  - Tariff
  - Stranded Costs
  - Regulatory Process
  - Consumer Empowerment
- Issues related to policy formulation process

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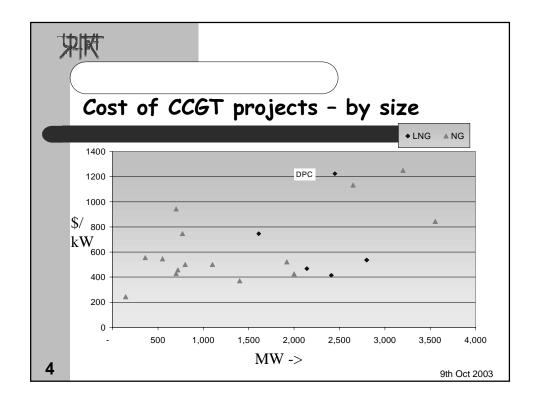
# Important features of historical

• Excessive stress on "attracting investment"

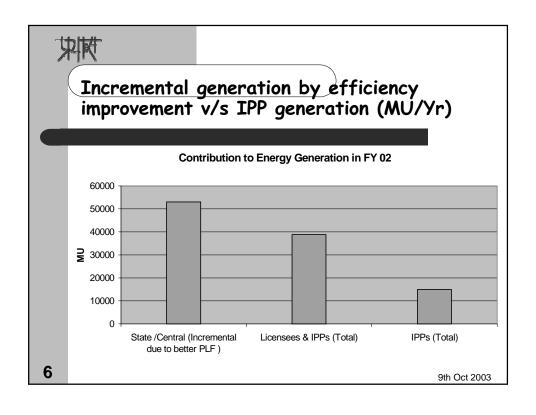
#### This resulted in

development

- Excessive incentives
- Competition & cost considerations on the back-seat
- Insufficient emphasis on efficiency improvement



CCGT	(1994-2000			
	Comital Coat of CCCT B	va is ata (400	1 10 2000)	
	Capital Cost of CCGT P	MW MW	\$/kW	
	North America	24,831	573	
	Australia Asia pacific	3,288	615	
	Latin America	16,098	703	
	Western Europe	23,003	750	
	Middle East	12,823	793	
	Eastern Europe	3,632	796	
	South East Asia	14,814	803	
	Indian Subcontinent	13,299	875	
	Africa	538	923	
	calculations based on datab World Resource Institue usin			



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# <u>Important features of historical</u> development

- Excessive stress on "attracting investment"
- Insufficient attention to
  - Transparency
  - Accountability of decision-makers
  - Consumer Participation
- > Need to avoid these mistakes today

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## Segmentation due to E-Act 2003

- A. Large consumers Those who are resourceful (information & capital) can benefit from 'market'
- B. Urban consumers Largely under regulated (private) monopoly
- C. Rural consumers Likely to be under public monopoly
- D. Un-electrified households

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Generation planning & investment ...1

100,000 MW in 10 years = Rs. #%@ Lakh Cr !!

Need for re-assessing utility demand forecast is an imperative

Major thrust of E-Act on market & competition
Reducing and changing role of government
Need to ensure effective competition
Questionable role of "Fiscal & other incentives" for attracting investments. (market distortions?)



#### Generation planning & investment ...2

- Central government initiatives such as 50,000 MW Hydro are against the spirit of E-Act
- Government intervention <u>only</u> for 'energy security' & 'minimizing social & environmental impacts'. This need to be tested against 'Least cost' principles
  - For example DSM v/s renewable energy or some specific fuels

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### Competition

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- Competition and / or regulation
  - Clearly defined boundary is essential
  - For each zone ensure adequate precautions
- For example In 'competition' zone
  - Avoid slippery definition of competition in case of power procurement or generation investments by DisComs (regulated monopolies) or government control on investment by PSUs.
  - Need for competition based on "Avoided Cost"

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Competition ....2

• For example - In 'competition' zone

- Urgent need to remove "Information Asymmetry". There should be a Public Domain database, listing

• Cost of all power projects (with detailed breakup of costs)

• All transactions by traders

• DisComs performance parameters and benchmarks

A similar process has been initiated in the USA

Failure to ensure true competition →

Danger of (unregulated) oligopoly

Adverse impact on Segment B and C consumers

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#### Tariff Issues

- Segment B and C consumers are going to face very major tariff shock
- Unfortunately, till date no clear analysis / forecast of tariff impact on these categories
- MoP should avoid 'artificial' tariff shock through
  - Depreciation norms, O&M, Investment return or
  - Revaluation of assets
  - Rather consider reserving old plants for 'deserving' consumers with low paying capacity

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#### Historical / Stranded Costs

- High T & D losses
- High cost IPPs

Do not allow large consumers to escape burden of these historical inefficiencies / stranded costs **and** expect only small consumers to pay for the same.

- → Apply cross-subsidy surcharge to Captive plants also (needs amendments to E-Act)
- → Modify policy for Wheeling Charges etc.

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### Regulatory process

- Selection process needs to be improved
  - Composition of selection committee, transparency in selection process
  - New appointments / process would be tone setter
- Need for RC capability development (a training center for RC members and staff)
- Need for code of conduct, standard of performance

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#### Consumer empowerment

- Institutional support for
  - Awareness creation
  - Capability building (training)
  - Regulatory intervention
  - Financial support
- Need to make RC & utility accountable through
  - Mandatory systems for operationalizing transparency
  - Ensuring high credibility of appeal mechanism

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#### Other issues

- Captive 'Set-up' should be clarified as 'newly built / constructed'
- The minimum area for 2<sup>nd</sup> licensee should be a district
- Need for comprehensive policy for Renewable Energy.

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# <u>Issues related to policy</u> formulation process

Essence of democracy is informed and meaningful public participation in decision-making

- E-Act will have long term and severe impacts
- Hence, the related decisions should address people's concerns, should be seen as just, and
- Undue influence of powerful sections on these decisions should be prevented

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# <u>Issues related to policy</u> formulation process

A well tuned process is a mechanism to achieve this. The Task-force should:

- Make public all submissions made before it
- Give a well reasoned report that consists of
  - Problem definition
  - Objectives
  - Options assessments
  - Recommendations and
  - Impact analysis

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