

Pls. find below my comments on the “Tool to determine the baseline efficiency of thermal or electrical energy generation systems”;

1. Section I definitions mentioning that load refers to output of energy generation system at which the system is operated during efficiency determination test and it is expressed as kW or MW.
Comment – Tools is referring to electrical and thermal energy generation system then the output from the system should not be restricted to kW or MW (which represent output from power generation system) it should include kCal or kJ or MCal or MJ also (which represent output from thermal energy generation system).
2. It was mentioned in the tool on page 2 that the tool is applicable to only single fuel system.
Comment – It will be good if tool mentions the procedure for efficiency determination for dual fuel firing systems it was observed that most of the energy generating systems are dual or co-firing systems and thus this tool will not be useful for efficiency determination of such systems. In such case can project proponent document efficiency with each of the fuel and take a conservative value of efficiency as baseline efficiency value?
3. The tool mentions that; “The tool can be applied only if load is the main operating parameter that influences the efficiency of the energy generation system”.
Comment – It is requested to clarify this condition as it is not coming clear.
4. The tool on page 4 (while using option B) mention that; “Efficiency determination tests shall be conducted for the entire system as a whole including auxiliary equipment, such as the fuel conditioning system, preheating systems, etc. All energy inputs and outputs, such as the feed water supply or energy losses through blow down losses, shall be taken into consideration. Measurements shall be done using calibrated equipments as required by the relevant national / international standards”.
Comment – requested to clarify whether standard assumptions / value by manufacturer can be considered while mentioning
 - i) auxiliary consumption of equipments mentioned above,
 - ii) blow down lossesOr same need to measure at actual and used for efficiency calculation or a conservative value out these two options required to consider
5. **Comment** – request to provide efficiency value for new coal fired boiler. Also clarify whether the default value of efficiency for coal fired boiler is same for each type of coal?