

AGP/Leg/2025/002

03.01.2025

To,

The Secretary,

Petroleum and Natural Gas Regulatory Board,

Babar Road, Barakhamba Lane,

World Trade Centre,

New Delhi 110001

Sub: Comments on suo-motu proposal for development of Natural Gas pipeline from Ennore to Suryapet.

Ref: PNGRB/Auth/2-NGPL(17)/2024 dated 03rd December 2024

Dear Sir,

Greetings from AG&P!

This is with reference to above-mentioned Public Notice web-hosted by the Hon'ble Board seeking views from stakeholders on suo-motu proposal for development of Natural Gas pipeline originating from Ennore.

At the outset, we would like to appreciate the initiative of the Hon'ble Board in moving this proposal for setting up of new Natural Gas Pipeline connecting new area to the National Gas Grid.

Our comments on the Ennore – Suryapet pipelines in the prescribed format is enclosed for your kind perusal as Annexure - 1.

We would be happy to participate in an open house discussion and provide our further inputs before PNGRB finalises the proposal and invites bids.

Thanking You,

For AGP City Gas Private Limited


Susheel Jad

President and General Counsel



Format for submission of views on the Proposal
for Ennore – Suryapet Pipeline

S. No.	Views in respect of the Proposal	Ennore to Suryapet
1.	Name of the entity/person	AGP City Gas Private Limited
2.	Complete Address	Unit No. 305, 3 rd floor, Worldmark 2, Asset – 8, Hospitality District, Aerocity, New Delhi – 110037
3.	Email ID	Email: commercials@agppratham.com
4.	Identification Proof	NA
5.	Views and Suggestions related to:	Suo-Motu Proposal for NGPL
	a) Natural Gas Pipeline proposal	Ennore – Suryapet
	b) Other aspects of the proposal	-
	c) Any other issue	Comments enclosed.



Our initial assessment of the route proposed by the Hon'ble Board tells us that this pipeline can better cater to the requirements of Natural Gas even in remote areas of the states of Andhra Pradesh and Telangana.

We would request the Hon'ble Board to take the following points into consideration while evaluating the proposal:

1. Avoiding Duplication of Infrastructure

It is important to highlight that the Kakinada–Vijayawada–Nellore Pipeline (KVNPL) has already been authorized to M/s IMC Limited, following the route of Kakinada–Rajahmundry–Vijayawada–Guntur–Ongole–Nellore. The newly proposed Ennore–Suryapet Pipeline would result in a duplication of infrastructure in close proximity to the KVNPL. Therefore, we request the Board to reconsider the proposed route for this pipeline.

2. Protection of CGD Entities' Rights

The Board may ensure that the rights of CGD entities with GAs falling enroute the NGPL shall not be encroached by the Authorized NGPL entity. The Board may further clarify to the bidders that the purpose of the pipeline is to simply transport gas and not supply natural gas to any industrial customers serviced by CGDs enroute the NGPL as per regulation 3(2) of Petroleum and Natural Gas Regulatory Board (Authorizing Entities to Lay, Build, Operate or Expand City or Local Natural Gas Distribution Networks) Regulations, 2008.

3. Re-Routing to Address Gaps

The authorization for the development of the Ennore–Nellore NGPL, which was to connect to Sri Potti Sriramulu Nellore District GA and specifically to the city of Nellore, was cancelled by PNGRB, a decision given by APTEL in its judgment dated 06.10.2023. Considering that there is currently no commissioned NGPL in the vicinity of the said GA, we request the Board to re-route the proposed pipeline to pass through Nellore District and cover Nellore City.

4. Limited Dependency on Proposed Pipeline

By the time this pipeline is authorized and completed, AG&P would have already developed substantial infrastructure within its GAs, thereby significantly reducing its dependency on the proposed pipeline.

5. Demand Assessment

The Hon'ble Board may like to carry out independent demand assessment excluding the CGD industrial customers from AG&P GAs to get an realistic estimate of the demand.

