



Gujarat State Petronet Ltd.

GSPL Bhavan, E-18, GIDC Electronics, Nr. K-7
Circle, Sector-26, Gandhinagar-382028 Gujarat (INDIA)
Tel: +91-79-23268500/600
Website :www.gspcgroup.com



GSPL/COMM/2025
28th July, 2025

Secretary,
Petroleum and Natural Gas Regulatory Board (PNGRB)
1st Floor, World Trade Centre
Babar Road
New Delhi- 110001

Sub: Public Notice issued by PNGRB regarding application for laying, building and operating a dedicated pipeline for natural gas from ONGC's Padra well 149 in Gujarat and ASKY Metals Private Limited's plant at Village Ranu Ta: Padra, Dist: Vadodara, Gujarat 391 445 under Regulation 19(2) of PNGRB (Authorizing Entities to Lay, Build, Operate or Expand Natural Gas Pipelines) Regulations, 2008

Ref.: PNGRB/Auth/2-NGPL(06)/2025 dated 17.07.2025

Respected Sir,

With reference to above, please find attached herewith GSPL's views at **Annexure-I** for your kind perusal.

Moreover, we would like to participate in the Open House Discussion to be convened by the Hon'ble Board on the aforesaid Public Notice.

Thanking You,

Yours Sincerely

Devendra Agarwal
GM (Commercial)

Annexure-I

GSPL's views on the dedicated pipeline proposal to be laid directly by customer

1. This is with reference to GSPL's comments submitted earlier on PNGRB's Public Notice dated 31st July 2024, which invited comments on an application regarding Kailash Energy Solution (KES) laying, building, and operating a dedicated natural gas pipeline from ONGC's Padra wells 149 and 93 in Gujarat. For the sake of brevity, our comments submitted earlier are not being repeated herein and are as provided as **Annexure-II** to this letter. To reiterate, GSPL humbly submits that dedicated pipelines should not be laid by customers directly, as the same is not provided for in the extant regulatory framework.
 - a. **Para 2.1 of MoPNG's Policy** for Development of natural gas Pipelines and City or Natural Gas Distribution Networks refers to dedicated pipelines as those **laid to supply gas to specific consumers** and further envisages them to originate from regulated pipelines and **not from gas source and neither by specific customer**.
2. Moreover, an Open House Discussion (OH) was held on 24th October 2024 wherein it was discussed that KES had already constructed and commissioned its dedicated pipeline and commenced drawing gas from ONGC **without receiving the required approval/acceptance** from the Hon'ble Board,. The Hon'ble Board had stated that necessary stringent actions would be taken against KES for the same. We would like to ascertain from the Hon'ble Board the status of authorisation/acceptance of KES' dedicated pipeline.
3. Furthermore, AGP in the OH had submitted that the authorised CGD entity should serve the customer with demand below 50,000 SCMD, and despite VGL being the Authorised CGD entity in Vadodara GA, AGP was willing to supply off-spec gas from ONGC, provided the customer agrees to the same, thus making dedicated pipeline unnecessary. Moreover, GGL opposed the development of dedicated pipeline by a customer on the grounds of safety issues as transportation of wet gas/off spec gas is not possible through CGD network and dedicated pipeline by customer compromises on proper odorization and processing.
 - a. We humbly submit that GSPL agrees with GGL, as customers laying dedicated pipelines themselves, may not be well equipped to handle such off-spec gas, which would require proper handling, proper odorization and processing.
4. However, we humbly submit that in the specific instances of KES and ASKY, if the authorised entity is unwilling to/does not have the resources to develop a pipeline network to connect to the said field, then the next closest entity to the authorised GA should be allowed to develop infrastructure to connect to the customer. Generally, the Hon'ble Board is requested to provide an option to the next closest pipeline entity (after providing priority to the authorised entity and in case the authorised entity refuses) the chance to develop a pipeline network to connect to the source, rather than allowing customers to connect directly to such gas source. Allowing multiple customers to lay dedicated pipelines to connect to the same gas field directly (i.e. ONGC's Padra well 149) would lead to **infructuous investment and duplication of infrastructure**, which can be easily avoided.
5. In addition, we believe that **Section 11(i)** of the PNGRB Act empowers the Board "to regulate technical and safety standards, **including land usage and environment protection.**" So, approving multiple parallel pipelines for the same route, needlessly



increases the amount of land permanently diverted from other uses, contravening the principles of efficient and sustainable land management.

- a. This is particularly critical in regions like Vadodara/Padra, where land is both agriculturally productive and under pressure from urban/ industrial development.
6. In conclusion, GSPL would like to request the Hon'ble Board to reconsider and not entertain such dedicated pipeline proposals to be laid directly by the customers, especially when it would adversely affect the interests of the authorized entity. Further, the impact of such customers directly laying dedicated pipelines without requisite regulatory approval/acceptance, especially without meeting appropriate safety and technical requirements regulations, would jeopardize the public at large.
 7. This submission is without prejudice to the writ petition presently pending before the Hon'ble Delhi High Court, *Gujarat State Petronet Limited v PNGRB & Anr.*, WP(C) 5428/2021, which *inter alia* challenges the validity of Regulation 19 of the NGPL Authorization Regulations.

