

AGP/CMR/2024-25/01
March 22,2024

To
The Secretary
Petroleum and Natural Gas Regulatory Board
1st floor, World Trade Centre
Babar Road, Barakhamba Lane
New Delhi-110001

Subject: Draft proposal for development of Natural Gas pipeline from Kakinada to Srikakulam under Regulation 4(2) read with Regulation 6 of PNGRB NGPL Authorization Regulations.

Ref: PNGRB/Auth/2-NGPL (19)/2023 dated 08th January 2024

Dear Madam,

Greetings from AG&P Pratham!

This is with reference to above referred Public Notice web-hosted by the Hon'ble Board seeking views from stakeholders on the subject matter.

At the outset, we would like to appreciate the initiative of the Hon'ble Board in moving this proposal for setting up of new NG pipelines connecting new areas of Andhra Pradesh to the national gas grid.

Our comments on the proposed pipeline in prescribed format is enclosed for your kind perusal.

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

Thank you for your attention to this matter.

Thanking you,
For AGP City Gas Private Limited



Vinukumar S. Balakrishnan
Chief Marketing Officer & Head - Commercial

Encl: a/a

Format for submission of views on the Proposal for Pipeline Name:
Kakinada – Srikakulam

S. No.	Views in respect of the Proposal	Kakinada – Srikakulam
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/ telephone/ fax	Email: commercials@agppratham.com Info.citygas@agppratham.com Phone: +91 (11) 40224573
4.	Identification Proof (in case of an individual person)	N/A
5.	Views and suggestions related to:	
a)	Natural Gas Pipeline proposed	Kakinada – Srikakulam
b)	Other aspects of the proposal	-
c)	Any other issues	Comments enclosed.

The initiative to develop this pipeline, with its point of origin from Kakinada, Andhra Pradesh and connecting to GAIL's KG Basin Natural Gas Pipeline Network, PIL's East-West Natural Gas Pipeline and IMC's under construction pipeline Kakinada-Vijaywada-Nellore, is a welcome step towards meeting the Natural Gas requirements in the eastern regions of Andhra Pradesh.

However, AGP would like to make certain suggestions/comments on the proposed pipeline for the kind consideration of the Board:

1. It is submitted that the Kakinada – Srikakulam Pipeline would help bring the domestic gas from KG Basin NGPL to Srikakulam and further, to Nellore District by connecting the Kakinada-Vijaywada-Nellore Pipeline to this proposed pipeline.
2. It is requested that the Hon'ble Board may introduce sufficient safeguards to ensure that only serious and capable parties participate or bid. This will help avoid a recurrence of previous bidding instances where bidders struggled to achieve financial closure.
3. It is also suggested that the Hon'ble Board should also emphasize that the pipeline must facilitate bi-directional flow.
4. It is suggested that the Board should establish timelines on a section-by-section basis for timely completion of the project within the stipulated period of 3 years.
5. It is further requested that PNGRB should consider suggesting a minimum tariff for this pipeline, similar to the approach taken in CGD bidding, to ensure commercial feasibility of the project.
6. It may also be clarified by the Hon'ble Board that the exclusivity rights of the authorized CGD entities will not be compromised by setting up of this pipeline by NGPL entity that will be authorized to lay this pipeline.

The proposed pipeline grid harbours immense promise, and its integration into the national gas grid heralds a momentous stride towards the realization of the visionary concept of One Nation, One Gas Grid. We remain available for any further discussions or clarifications necessary and look forward to your favourable consideration of our request.

