

AGP/CMR/2024-25/073
15th Feb 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 Kochi to Thoothukudi via Kanyakumari under Regulation 4(2) read with Regulation 6 of PNGRB NGPL Authorization Regulations.

Ref: PNGRB/Auth/2-NGPL (18)/2023 dated 15th 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 Kerala and Tamil Nadu 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:
Kochi to Thoothukudi via Kanyakumari

S. No.	Views in respect of the Proposal	Kochi to Thoothukudi via Kanyakumari
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	Kochi to Thoothukudi via Kanyakumari
b)	Other aspects of the proposal	-
c)	Any other issues	Comments enclosed.

The initiative to develop this pipeline, with its point of origin from KKMBPL / PLL's LNG Terminal in Kochi, and connecting to IOCL's Ennore – Thiruvallur – Bengaluru – Puducherry – Nagapattinam – Madurai – Tuticorin Natural Gas Pipeline at Tuticorin, is a welcome step towards meeting the Natural Gas requirements in the Southern regions of Kerala and Tamil Nadu.

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

1. Though the full details of the pipeline route is not available, it can be discerned from the given map that the pipeline is either not passing through or has minimal coverage of Alappuzha, Kollam and Trivandrum Districts in State of Kerala. Even if the line in its proposed alignment would pass through these Districts, it would not be covering major demand centers such as Alappuzha City, Ambalapuzha, Haripad, Kayamkulam, Karunagapalli, Chavara, Kollam City, Chathanoor, Attingal, Trivandrum City and Kovalam.
2. The population of Alappuzha, Kollam and Trivandrum Districts combined is about 80.64 Lakhs as against a population of around 31.71 Lakhs in Kottayam and Pathanamthitta Districts (Census 2011). We therefore request and propose a reassessment of the pipeline alignment considering the fact that Alappuzha, Kollam and Trivandrum districts are large demand centers as compared to Kottayam and Tiruvalla (Pathanamthitta). and realigning the route along Alappuzha, Kollam and Trivandrum Districts which would optimize its impact on regional energy needs.
3. In case, rerouting is not feasible, for any reason, then we request the addition of spurlines connecting the proposed pipeline to our demand centers in Alappuzha, Kollam and Trivandrum districts. However, this alternative would be expensive proposition and strenuous as we would need CGS setup, etc.
4. Further, 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.
5. It is also suggested that the Hon'ble Board should also emphasize that the pipeline must facilitate bi-directional flow.
6. 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.
7. 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.

8. It may also be clarified by the Hon'ble Board that the exclusivity rights of the authorised CGD entities will not be compromised by setting up of this pipeline by NGPL entity that will be authorised to lay this pipeline.

We understand the challenges associated with such considerations and appreciate your commitment to optimizing the pipeline for maximum efficacy. We remain available for any further discussions or clarifications necessary and look forward to your favorable consideration of our request.