

THE ASSOCIATED CHAMBERS OF COMMERCE AND INDUSTRY OF INDIA
D S RAWAT

Secretary General

Dear Madam

 31st May, 2018

Subject: Comments and Suggestions in respect of PNGRB proposal to declare BPCL's Mahul Refinery to Santa Cruz Airport petroleum and petroleum products (ATF) pipeline of BPCL as common carrier pipeline

Reference: Public Notice No. Infra/PPL /50/BPCL/MUMBAI-ATF/01/2018 dated 4th May 2018

Reference to the above Public Notice wherein PNGRB has expressed the opinion that it is necessary to declare BPCL's Mahul Refinery to Santa Cruz Airport at Mumbai petroleum and petroleum products (ATF) pipeline of BPCL as a common carrier which shall be regulated by PNGRB in terms of applicable notified Regulations, we would like to submit our comments as under:

1. As you may be aware that **Associated Chambers of Commerce & Industry of India (ASSOCHAM) has been serving Nation since 1920**. As a representative organ of Corporate India, ASSOCHAM articulates the genuine, legitimate needs and interests of its members. Our vision is to Empower Indian enterprise by inculcating knowledge that will be the catalyst of growth in the barrier less technology driven global market and help them upscale, align and emerge as formidable player in respective business segments.
2. ASSOCHAM represents the interests of more than 3,00,000 direct and indirect members. Through its heterogeneous membership, ASSOCHAM combines the entrepreneurial spirit and business acumen of owners with management skills and expertise of professionals to set itself apart as a Chamber with a difference. It has been especially acknowledged as a significant voice of Indian industry in the field of Information Technology, Civil Aviation, Biotechnology, Telecom, Banking & Finance, Company Law, Corporate Finance, Economic and International Affairs, Tourism, Corporate Governance, Infrastructure, Energy & Power etc.
3. As part of our mission and vision, we strongly promote polices and business environment which encourages competition, fair play between all business partners and free from any barriers. We fully support the idea of PNGRB who also support competition for supply of ATF supply to Mumbai airport, by declaring the ATF pipelines presently owned and controlled HPCL and BPCL as **Common Carrier** and bringing them under applicable Regulations of PNGRB. It is a matter of common sense that bringing ATF to Mumbai Airport by any other means besides Pipeline - by road or rail is not practical in a congested city like Mumbai. Hence, the barriers created by restricting access to these pipelines is thwarting true competition, which needs to be dismantled.

Page No. 1

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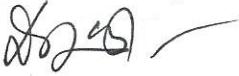
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4. By bringing these Pipelines under purview of PNGRB as Common carrier will encourage entry of Private ATF suppliers and also give an opportunity to airlines to source ATF of their choices, which is currently being denied by monopolistic control by existing players.
5. With entry of private players, true competition will set in among ATF suppliers thereby benefitting Airline operators immensely, as ATF constitutes around 45% of their operating expenses. Aviation sector and airline passengers shall be benefitted directly.

We fully support PNGRB in declaring these two ATF Pipeline as Common Carrier or Contract Carrier and regulate the same as per applicable Regulations, at the earliest.

Thanking you with warm regards,

Yours Sincerely,



(D. S. Rawat)

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