

207

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

To: "secretary@pngrb.gov.in" <secretary@pngrb.gov.in>

Date: 03/06/18 01:31 PM

From: "Rena Rzayeva - Procurement Mgr (Fuel)" <rena.rzayeva@emirates.com>

image001.jpg (2kB)

27th May 2018

To
The Secretary,
Petroleum & Natural Gas Regulatory Board
1st Floor, World Trade Centre, New Delhi – 110 001

Dear Sir,

Subject #1: 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.

Subject #2: Comments and Suggestions in respect of PNGRB proposal to declare HPCL's Mumbai Refinery to Mumbai Airport petroleum and petroleum products (ATF) pipeline of HPCL as common carrier pipeline

Reference: Public Notice No. Infra/PPL /50/HPCL/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 / HPCL's Mumbai Refinery to Mumbai Airport at Mumbai petroleum and petroleum products (ATF) pipeline of BPCL / HPCL as a common carrier which shall be regulated by PNGRB in terms of applicable notified Regulations.

Emirates are the largest foreign carrier operating to different locations in India, with more than 200 flights a week. This is indicative of our commitment to this region.

At Emirates' our focus has been to contain costs hence we adhere to complete and transparent tendering process and procure our ATF requirements into-wing. Towards this goal, and in the interest of all parties concerned, we would like to see that the following issues are given due consideration:

- Increased competition at major Indian airports
- On-airport open access
- Off-airport open access
- Uniform and transparent pricing for All Users
- Competitive into-plane services

For on-site open access, it is imperative for us to have competition in order to procure best commercial terms for our airline.

For off-site facility (port facility, storage tanks, pipelines etc). It is most important that it is open to all entities wishing to supply fuel to the airport and should not be controlled by one or more fuel suppliers which has a vested interest in supply of fuel to the airport and can potentially block the competitors from entering the airport. Access to off-site infrastructure needs to be at a reasonable fee that is determined in a transparent manner and is homogeneously applied to all users (no discriminatory pricing). Regulation of the fees can help to achieve that. Assets should be depreciated over the useful life to effectively spread out capital cost.

1621/seg
4/6
AA(AK)/192e
4/6/18
AA(AK)
20/5/18

206

We would like to submit our comments as under:

1. We, Emirates are one of leading International Airlines operating from Mumbai airport , with the proposal of ATF pipeline being declared as Common Carrier, all ATF suppliers who are authorized will have access to the pipeline thereby making it possible for entry of more ATF suppliers at Mumbai Airport. This will give us more options to select ATF suppliers of its choice as the case is in other airports.
2. Entry of more ATF suppliers, will bring in true competition among fuel suppliers at Mumbai airport which will not only support Emirates' fuel costs but also be beneficial to the Indian Aviation sector and airline passengers. It would also encourage Airlines to uplift more fuel volumes in Mumbai.

We appreciate and support the initiative of PNGRB to declare this ATF Pipeline as Common Carrier or Contract Carrier and regulate the same as per applicable regulations, at the earliest.

Thanking you,

Yours Sincerely,



Rena Rzayeva
Procurement Manager (Fuel)
P.O. Box 686 | T +9714 7084691
Dubai, United Arab Emirates | www.emirates.com