

Subject: **Levy of fees and other charges Regulations**

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

Cc: narain mahesh (नारायण महेश) <maheshn@bharatpetroleum.in>, malik d (मलिक दामक) <malikd@bharatpetroleum.in>, gautam umesh (गौतम उमेश) <gautamu@bharatpetroleum.in>, vipul arora <vipularora@bharatpetroleum.in>, verma brijesh (वर्मा ब्रिजेश) <vermab@bharatpetroleum.in>

Date: 01/12/18 08:32 PM

From: ankush bhandari (अंकुश भंडारी) <akbhandari@bharatpetroleum.in>

PN01112018.pdf (631kB)

Dear Madam

With reference to the public notice dated Nov 1, 2018 (enclosed here), below is our response:-

(on behalf of CGM, Gas Projects- Sh. Mahesh Narain)

Ref: Gas.D.Con.PNGRB

Dec 1, 2018

Secretary,  
Petroleum and Natural Gas Regulatory Board  
First Floor, World Trade Centre  
Babar Road, New Delhi . 110001

**Subject:** Comments on draft regulations on Petroleum and Natural Gas Regulatory Board (Levy of Fee and Other Charges) Regulations, 2007.

Madam,

This mail is in reference to the public notice dated 1<sup>st</sup> November 2018, vide which the Petroleum and Natural Gas Regulatory Board (PNGRB) have sought comments/views from the stakeholders on draft regulation on PNGRB (Levy of Fee and Other Charges) Regulations, 2007.

The draft regulation has been reviewed by us as a key stakeholder and our comments / views have been listed below, with a request to PNGRB to consider the same favourably:

- i) Vide the draft regulation, PNGRB is proposing to almost double the fees stipulated in regulation 3 of PNGRB (Levy of Fee and Other Charges) Regulations 2007. Fees as per regulation 3(1)(2) is proposed to be increased ten times.
- ii) The purpose of PNGRB for levying Fees and Other Charges is basically to cover their expenses incurred while discharging its function under section 11 of the PNGRB Act, 2006. As such the charges levied by PNGRB are much higher than statutory bodies viz, PESO, Factory Inspector etc.

Also, with the increasing no. of GAs and entities under City Gas Distribution after Round 9 and proposed Round 10, PNGRB will get more fees and hence, the increase in levy of fees and other charges should not be done at this stage.

**We are of the view that PNGRB should continue with the existing level of Fees and rationalize the Other Charges (under Regulation 4)**

iii) Regulation 4(2) (A) of PNGRB, the charges are based on population and there are 2 slabs. Here, for the 1<sup>st</sup> eight years, no charges should be levied on the entity as the Work Program for 8 years requires spending a very high capex in the initial 8 years. After 8 years also, the charges should be rationalized and the charges for the maximum slab of population should also not exceed Rs 10 lakhs.

Regulation 4(3) of PNGRB (Levy of Fees and Other Charges) Regulation, 2007 states that other charges shall be paid annually within fifteen days from the date of finalizing the annual statement (previous financial year) of accounts by the entity. However, in the proposed draft regulation 4(3) other charges are required to be paid within a period of two months from the beginning of financial year based on revenue accrued during the previous financial year. **We are of the opinion that there should not be any change in this clause.**

Thanking You,

Yours faithfully,

For **BHARAT PETROLEUM CORPORATION LIMITED**

Mahesh Narain  
CGM (Gas, Projects)

Regards

Ankush Kr. Bhandari  
Manager (Gas)

BPCL, ECE House, New Delhi-110001

\*\*\*\*\* Disclaimer/ आवीकृत \*\*\*\*\*

This message was sent from Mailing System of Bharat Petroleum Corporation Limited (BPCL), India. Unless explicitly authorized by BPCL, the views expressed in the message are of the sender. The information in this message and any attachments are intended for exclusive use of the recipient(s) and may contain proprietary, confidential or privileged information. Unintended recipient(s) may kindly delete it and notify the sender immediately. Recipient(s) are cautioned to check message/ attachments for any virus./ यह संदेश भारत पेट्रोलेयम कॉर्पोरेशन लिमिटेड (बीपीसीएल) - भारतवर्षक संग संदेश ंणाल से भेजा गया है। संदेश मांजो वचर ंय त कये गये हव्रे ंषक के अपने हजब तक क इहे बीपीसीएल वारा ंपट ंप से अधकृत न कया गया हो। इस संदेश एवं कसी भी अनुलनक मद्रुगई जानकार ंतकता(ओं) के अनय उपयोग के लए है और इसममालकाना, गोपनीय या वशेषाधिकार क जानकार हो सकती है। अनभेत ंतकताकृमया इसको हटा दएवं ंषक को तुरंत सूघत कर। ंतकता(ओं) को सतककया जाता है क संदेश/ संलनक मकसी भी ंकार का वायरस ना हो, इसकजांच कर ल।