

Ref: BPCL/PNGRB

9th November, 2020

The Secretary,
Petroleum & Natural Gas Regulatory Board,
World Trade Centre, 1st Floor, Babar Road,
New Delhi-110001

Sub: Submission of views on Draft Regulations on PNGRB Public Notice on Petroleum and Natural Gas Regulatory Board (Imbalance Management Services) Regulations, 2016.

We welcome the process initiated by PNGRB for reviewing Petroleum and Natural Gas Regulatory Board (Imbalance Management Services) Regulations, 2016.

In this regard we would like to submit our views on the draft regulation as given below:

1. Market price - Market Price of Gas considered for calculation of Imbalance Charges must be the daily Weighted average settlement price(s) of Gas traded for the applicable period in the Gas Exchange (IGX).
2. The shipper having multiple re-delivery points in different pipeline network under one GTA has the flexibility to manage imbalances on the gross cumulative basis of all re-delivery points on the all pipeline network instead of individual customer's re-delivery point specifically. This flexibility is already present as per the executed GTA and the same should continue.
3. The information of consumption at Re-delivery points should be provided to all the shippers by the IMC, irrespective of the Shipper availing IMC Services or not in order to cure the imbalances by the respective Shippers.
4. The cost of IMC services will incur GST@18%, it would add over and above the Gas Transportation Costs to the Shipper hence, it should be on Token minimal basis and should be as Notified by PNGRB. In cases where Shipper

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and Transporter being the same, they would be at advantage over other Shippers since they would not have to bear the IMC charges and hence it would not allow Fair Price Market competition to the end-Customers in the market. Hence, All the Shippers should be charged the same IMC charges as Notified by the PNGRB.

We request PNGRB to take cognizance of our views.

Yours faithfully,

For **Bharat Petroleum Corporation Limited,**



Shrikant Yadwadkar,

CGM(Sales),Gas.