

REF No: IGX/2020-21/36

14<sup>th</sup> October 2020

To,  
**The Secretary,**  
Petroleum & Natural Gas Regulatory Board,  
1<sup>st</sup> Floor, World Trade Centre, Babar Road,  
New Delhi – 110 001

**Subject: Views/ comments on draft Petroleum and Natural Gas Regulatory Board (Determination of Transportation Rate for CGD and Transportation Rate for CNG) Regulations, 2020**

**Respected Madam,**

This has reference to the public notice Ref No.: PNGRB/COM/1-CGD Tariff(1)/2015 dated 23<sup>rd</sup> September 2020 soliciting views from stakeholders on the proposed draft PNGRB (Determination of Transportation Rate for CGD and Transportation Rate for CNG) Regulations 2020.

With regards to the above draft amendment, we have suggestion/ seek clarification with respect to invoicing of gas consumers part of CGDs on whom such regulation shall apply.

We understand that currently the invoice raised by CGD entities is a single bundled invoice inclusive of all the components i.e. transportation tariff and gas cost. To bring in transparency, it is proposed that upon determination of Transportation Rate for CGD and Transportation Rate for CNG, the invoices raised by CGD entity to all gas consumers (whether part of open access or not) should segregate and provide clear break-up of various components in the invoice i.e. Natural Gas price, Transportation Rate for CGD, Transportation Rate for CNG and applicable taxes.

The above would:

- provide clarity to end consumers on cost of gas, transportation cost and taxes
- allow clear segregation, from accounting and other perspectives, between transportation services and sale of commodity, and
- be required as the tax applicable on natural gas as commodity (VAT/ CST) is different from GST applicable on Transportation Rate for CGD & CNG.

Consumers opting for open access would anyways have segregated invoices, as natural gas supplier would be different from transportation service provider.

May kindly evaluate possibility of implementing the above suggestion.

Yours sincerely,

**For Indian Gas Exchange Ltd.**



**Vikas Guliani**  
VP

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