

P-6904/2020/10/10/Scrg.

5/10-1862
24-10-2020
By [Signature]



MIKUNI INDIA PRIVATE LIMITED

SP2-19(A), 20 & 21 (A), New Industrial Complex (Majrakath), Neemrana, Behror, District-Alwar-301705, Rajasthan

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CIN : U50300RJ2008FTC027384

To
The Secretary,
Petroleum and Natural Gas Regulatory Board (PNGRB)
New Delhi, 110001

16th October 2020

JALU

Kind Attn. Ms. Vandana Sharma

Sub: Comments/ views on the proposed revised draft amendment Ref. No.
PNGRB/COM/2-NGPL/Tariff (3)/2014 Vol-IV (Part-1) (P-1439) Dated 29th September
2020

Madam,

We would like to bring the following concern which may rise in moving from existing tariff regime to the proposed unified tariff.

1. Our unit is involved in manufacturing of automotive engine components located at Neemrana, Distt. Alwar Rajasthan. The proposed unified tariff will increase the tariff substantially.
2. Earlier, there was a proposal of integration of HVJ and Chainsa Jhajjar pipeline for reduction of existing pipeline tariff. The current proposal is going to increase the tariff and it will impact our business substantially leading to unviability of our operation.
3. We are into auto ancillary business which is very labor intensive, the margin is also very thin. The implementation of new tariff may jeopardize employment of many workers as it will lead to unsustainable operation.
4. We are already struggling with the outcomes of COVID pandemic. Our profits and losses has already affected. There is no certainty in the gas price itself. With the variable tariff structure, it is going to add further uncertainty which will impact us heavily.

We request you not to implement this kind of variable weighted average tariff mechanism as it will adversely affect us,

Regards,

[Signature]

T. Inaba,
Vice President.

