

Ref: BPCL/PNGRB/CGD

27<sup>th</sup> October 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 Petroleum and Natural Gas Regulatory Board (Access Code for City or Local Natural Gas Distribution Networks) Regulations, 2020**

Madam,

This is with reference to the public notice ref PNGRB/Auth/1-CGD(16)/2020 dated 06.10.2020 seeking suggestions/views/comments of stakeholders on Petroleum and Natural Gas Regulatory Board (Access Code for City or Local Natural Gas Distribution Networks) Regulations, 2020.

We welcome the process initiated by PNGRB for public consultation process for framing the Access Code for City or Local Natural Gas Distribution Networks. In this regard, the views of BPCL are attached as Annexure-I for the kind consideration of Hon'ble Board.

We request PNGRB to consider our views.

Yours faithfully,

For Bharat Petroleum Corporation Limited,



Mahesh Narain  
CGM (CGD Projects)

Sr. No	Regulations under Draft PNGRB (Access Code for City or Local Natural Gas Distribution Networks) Regulations, 2020	Suggestions / Modifications
1	<p>Regulation 2 Sub regulation 1 (i) "designated exit point" means the exit point for which gas delivery has been mutually agreed between the shipper and the authorised entity.</p>	<p>Principle should be defined for identification of exit points which should be up front given in regulation. Also there should be Complaint redressal mechanics.</p>
2	<p>Regulation 2, Sub regulation 1 (e)</p> <p>"CNG exit point" means the point at which the CNG is off taken from a CNG compressor outlet point for delivery to the shipper with proper arrangement for metering at outlet of the CNG compressor by the authorised entity:</p> <p>Provided that the CNG exit point shall terminate at tubing connection or union where compressor exit is connected to dispenser and at filling nozzle in case it is connected to CNG cascade of the shipper or any other point available in the high pressure pipeline</p>	<p>The definition of the CNG exit point shall be clearly defined in the proposed regulation, we propose that online CNG station should also be considered as one of the exit point</p>
3	<p>Regulation 4, Sub regulation 1</p> <p>Authorised entity shall, within 90 days of declaration of its CGD network, as common carrier or contract carrier, determine in accordance with applicable regulations and declare by publishing on its website the entry point capacity, the exit point capacity, the CNG exit point capacity for open access at all entry points and exit points and the capacity at DPRS level for PNG and capacity at mother stations (Cascade filling capacity) for CNG in accordance with the provisions of these regulations: The authorised entity shall similarly declare the aforesaid information as on the end of each calendar month by tenth of the succeeding month.</p>	<p>We request for further clarity on exit points for CNG.</p>



4	<p>Regulation 4, Sub regulation 2</p> <p>The capacity in a CGD network for open access on cumulative basis at all entry points shall be at least twenty percent of the capacity of the CGD network or the maximum quantity of gas that has flowed in the CGD network even for a period of one day in the past whichever is higher. If such open access capacity in the CGD network falls below ten percent, the authorised entity shall increase the capacity of the CGD network so as to restore the open access capacity to at least twenty percent within a period of six months from the date it has fallen below ten percent.</p>	<p>Regulation should also ensure that 20% of compression capacity is available for open access.</p>
5	<p>Regulation 6, Sub regulation 1</p> <p>As per the provisions of the Regulation 8 (1) (a) (iii) and Regulation 8 (1) (b) (ii) of Petroleum and Natural Gas Regulatory Board (Exclusivity for City or Local Natural Gas Distribution Network) Regulations, 2008, authorised entities are required to reach all charge areas or wards in the authorised area through pipelines of adequate size to meet the demand of the consumers in these charge areas or wards.</p>	<p>It is requested to keep only the Charge area as defined in the Authorization letter.</p>
6	<p>Regulation 7: Provision of Access to third party CNG/L-CNG stations:</p>	<p>The paragraph on CNG &amp; LCNG shall be split separately and clarity on the same shall be brought out.</p>
7	<p>Regulation 8 sub-regulation 9</p> <p>Shipper shall be responsible for billing and collection of dues from its customers for natural gas, while for applicable charges the authorised entity shall raise bills on the shipper. As meter reading is the responsibility of the authorised entity except for PNG domestic consumers, the authorised entity shall have right to charge meter reading charges from the shipper as may be mutually agreed.....</p>	<p>We propose that there should be flexibility on meter reading and shall be based on mutual agreement between authorized entity and Shipper</p>
8	<p>Regulation 10 sub-regulation 1</p> <p>The shipper shall arrange to deliver natural gas at the entry points. The authorised entity shall provide facilities for transfer of custody and delivery of natural gas at the entry points at the cost of the shipper including measuring equipment: Provided that the shipper may install its check meter at the entry points at its own cost in case it desires so.</p>	<p>In case of number of shipper the practically it may not be possible to have multiple check meter for all shippers due to constraint of space at CGS.</p> <p>In case of multiple shipper it may not be easy to identify the</p>

		delivery of natural gas for the purpose of identification of over & under withdrawal until the entry and exit point gas is reconciled for each shippers including authorized entity.
9	<p><b>Regulation 10 Sub regulation 4</b>  The authorised entity shall provide at its own cost facilities, including measuring equipment, pressure reduction and control facilities, odourisation facilities, gas chromatography or any other system as agreed between the authorised entity and the shipper, required for transfer of custody and delivery of natural gas to the shipper at all the exit points. Provided that the shipper may install its check meter at the exit points at its own cost in case it desires so.</p> <p><b>Regulation 13 sub regulation (1)g</b>  any other charges mutually agreed in the access arrangement such as—</p> <ul style="list-style-type: none"> <li>i. ship or pay;</li> <li>ii. transport or pay;</li> </ul>	The odorizer and gas chromatography shall be at entry points only.
10		May be defined categorically by PNGRB