



HPCL SHAPOORJI ENERGY PVT LTD

Letter Ref. No. HSEPL/REG/PNGRB/2019/015

Date: 24th July 2020

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

Kind Attention: Ms. Vandana Sharma, Secretary.

Subject: Comments on Public Notice dated 29-June-2020, Public Consultation Document, Amendment of the Petroleum and Natural Gas Regulatory Board (Determination of Natural Gas Pipeline Tariff) Regulations, 2008 (“NGPL Tariff Regulations”).

Dear Madam,

This has reference to the public notice (ref: No. PNGRB/COM/2-NGPL/Tariff (3)/2019 Vol-II) web hosted on 29th June 2020 on the PNGRB website, soliciting views on the proposed amendment to the PNGRB (Determination of Natural Gas Pipeline Tariff) Regulations 2008. Please find below our views and comments on the proposed amendment.

The proposed PCD reflects an approach for combining tariff for two or more interconnected pipelines of an entity without specifying the geographical/market basis for the same, which in our opinion would distort the present market in favor of entity whose pipeline tariffs are combined and leave the other incumbents serving the same geography out of competitive markets and hence affecting the development of new pipelines.

Such combination of tariffs for selective pipelines serving a common geographical area / market would also adversely impact the development of new LNG terminals, that are dependent on pipeline networks of two or three entities for transporting gas or new pipelines which are left out from the whole exercise, hence would be resulting higher cost of gas to the end consumers.

PNGRB may consider determining the unified single transportation tariff of all the natural gas pipelines on pan India basis, i.e. bid out /non bid out natural gas pipelines, irrespective of being owned by different companies. Any amendment in tariff determination methodology must be guided by factors which encourage competition, by determining tariffs in non-discriminating nature.

Looking forward for your kind consideration.

For **M/s HPCL Shapoorji Energy Private Limited**

For, Saurabh
24/07/2020

K. Sreenivasa Rao

Chief Executive Officer

Date: 24th July 2020

Place: Mumbai