



May 11, 2020

**To**  
**The Secretary,**  
Petroleum & Natural Gas Regulatory Board,  
1<sup>st</sup> Floor, World Trade Centre,  
Babar Road,  
New Delhi – 110001

**Subject : Comments on Proposed amendments on "PNGRB (Code of practice for Emergency Response and Disaster Management Plan) Regulations, 2010".**

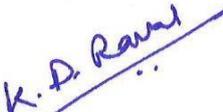
**Ref. : PNGRB Public Notices dated 17.02.2020, 02.03.2020, 12.03.2020, 13.04.2020 and 01.05.2020 regarding the above-mentioned amendments.**

Dear Madam,

With reference to the above-mentioned subject and referred public notices of PNGRB, comments on the proposed amendments are enclosed as **Annexure 1**.

This is for your favorable consideration please.

Yours sincerely,  
For Adani Gas Ltd.

  
(Authorized Signatory)



Encl: As above

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**Clause-wise Comments on Proposed amendments on "PNGRB (Code of practice for Emergency Response and Disaster management plan-ERDMP) Regulations, 2010"**

1. Comments on Clause 24.3 (Ref. File name: Annexure 1 dated 13.03.2020)

- Leakage from natural gas pipeline has been considered as major incident (under point # c).
- Board may please specify and consider major leakage only from primary network (steel line) for CGD company. Gas leakage in PE pipeline due to third party damages are quite frequent and it should not be considered as major incident. Therefore, Gas leakage from PE pipeline need to be excluded from the category of major incident.

2. Comments on Clause 24.6

- In the investigation it might be possible that the incident happened either due to external factor not under control of entity or due to collective failure of the organization, therefore Identifying the responsible persons for failure as per the assigned roles and responsibilities might not be possible to pinpoint. Therefore, this requirement needs to be reviewed by PNGRB and can suitable amended to as organizational responsibilities.
- The requirement for vetting the action taken report by board of director can be reviewed and amended as senior management personnel or key management personnel or one of the director as decided by entity board (as mentioned below in point #5 in this letter) who will be vetting the action taken of enquiry committee before forwarding to PNGRB.

3. Comments on Clause 2 (r)

- It is difficult to get mutual aid members for pipeline industries having minimum resources. However, PNGRB may kindly consider it as optional requirement.

4. Comments on Clause 4.2

- Board may kindly consider a single ERDMP document covering all Retail outlet (CNG station), CGS, LCNG and pipeline (steel &PE) in same GA under one ERDMP document.

5. Comments on Clause 8(2)

- PNGRB has proposed that entity should appoint one of its directors, within 90 days of these regulations coming into force, to be responsible for compliance to these regulations.

- It is submitted that almost all the authorized entities have an internal control system and suitable governance framework in place commensurate with its size and complexity of its operations. The framework ensures monitoring and compliance to all rules, regulations, guidelines as applicable at the entity level.
- Therefore, instead of appointing one of the directors as proposed, it is suggested that PNGRB may consider to include appointment of a senior management personnel designated as person responsible for the compliance of these regulations or appointment of a KMP as defined under Companies Act or one of the Director as may be decided by the Board of Company.

6. Comments on Clause 11(2):

- Resource mobilization: In some of the GA at remote location the availability of the required resource with civil authorities and nearby industries might be an issue. PNGRB may kindly review the list with respect to relevant businesses.

7. Comments on Clause 12.2 (ii)

- For daily laborer who are for excavation, they are given safety induction & hazards training. However, validation of safety training on daily basis might be an issue. Kindly review the validation part.

8. Comments on Clause 14.2.5.9

- To implement the siren code, same code needs to be provided to all neighboring industries. Sirens may not work in CGD as assets are spread out in urban centers. Where all siren can be put up. Moreover, in urban areas it ends up creating unnecessary panic and may result into another disaster.

9. Comments on Clause 23(2)

- In the classification of Major incidents, the following categories need to be modified / removed.
  - Due to unauthorized work and carelessness from 3rd party utilities, many times the damages and subsequent gas leaks are potential for fire situation in CGD networks. To receive the information at control room sometimes it might take bit more time from remote areas. In view of this, it is requested to consider the time duration of fire to 45 mins to be treated as Major incident which would include notification, response and stopping the fire for CGD company instead of 15 minutes duration as proposed.
  - The category (d) Losses of Rs.20 lacs need to be reviewed and increased to Rs.100 lacs.
  - The category (f), plant shutdown / outage due to the incident can be removed for CGD company as the entity has its own internal reporting

protocol of reporting & investigation and moreover in CGD company it is quite common due to 3<sup>rd</sup> party damages as mentioned above.

- 'FIR on 'Major' incident to be intimated to PNGRB immediately or not later than 4 hours of occurrence is to be reviewed as the incidents if happened during night hours then it will be difficult to report it immediately. In case of major incident field teams are busy in mitigations measures and it takes time to get even preliminary information. Time for FIR can be 24 hours.

#### 10. Comments on Clause 30 Annexure A

- As per clause it is mentioned that a detailed action plan on security breach/threat including bomb threat shall be prepared by entity by considering all its installations. Each of the installation is not required for this requirement. Rather action plan for each category and type of installation in the city by CGD entity can be considered. It is submitted to please review the stipulation.

#### 11. Comments on Clause 31

- Any minor amendment and approval through entity board or director might be cumbersome considering number of GASs. PNGRB may kindly review this matter and allow the minor amendments like change of phone number, plant / machinery, details etc. without requirement of Board of Directors approval.

#### 12. Comments on Checklist 1

- We are currently doing HAZOP study. Please provide the detailed guideline for PHA study.

#### 13. Comments on Schedule VI

- Comment on Clause 23(2) under serial number 9 need to be considered. Losses of Rs.20 lacs need to be reviewed and increased to Rs.100 lacs.

#### 14. Comments on Annexure 1

- Instead of Chemical name, it should be Product Name
- Instead of Formula, it should be Chemical Family

#### 15. Comments on Annexure 2

- Please clarify if ERDMP prepared during construction needs to be approved by 3<sup>rd</sup> party. Since the competent safety professional would prepare it during construction phase, PNGRB may accept it during the construction phase and during the operation phase 3<sup>rd</sup> party may be deployed for the conformity assessment.