

MAHARASHTRA NATURAL GAS LIMITED

30.04.2020

MNGL VIEWS ON DRAFT AEMENDMENTS PROPOSED “PNGRB (CODES OF PRACTICES FOR EMERGENCY RESPONSE AND DISASTER MANAGEMENT PLAN (ERDMP)) REGULATIONS, 2010”

This has reference to the Public notice no. Nil dated 17.02.2020, 02.03.2020, 12.03.2020 and 13.04.2020 w.r.t. proposed amendment draft on “PNGRB (Codes of Practices for Emergency Response and Disaster Management Plan (ERDMP)) Regulations, 2010”.

In this regard, MNGL’s views are given as under:

1. The proposed sub-regulation 24.2 may not be required to incorporate as most of the CGD entities are already exercising this process and we feel that the outcome of the investigation should not be to fix responsibility but to learn through corrective action and establish preventive action to avoid future incidents.
2. The proposed sub-regulation 24.3 may be incorporated.
3. The proposed sub-regulation 24.4 may be incorporated except point no. 24.4.d i.e. *Fix responsibility*. We feel that this should be avoided and be replaced by CAPA else Entities may start hiding the incidents if the board is bent upon fixing responsibility.
4. The proposed sub-regulation 24.5 may be incorporated.
5. We do not agree with incorporating sub-regulation 24.6 as CGD entities have multiple arrangements of operation like Own CNG Stations (COCO), Franchisee CNG Stations (NRO), CODO, DODO and co-located facilities at OMC outlets, it is very difficult to fix responsibilities, also manpower is very lean and thin in most of CGD’s. In all, the very purpose of avoiding incidents and taking corrective actions would be defeated.

PNGRB is requested to consider the above first cut suggestions/recommendations favorably.