

**EWPLL comments on Public Consultation Document dated 04.05.2018 on EWPL's  
Final initial unit natural gas pipeline tariff**

Point wise comments on the PCD are given below:

| PCD<br>Sl.<br>No. | Description  | Comments / Views  |
|-------------------|--|---|
| 4                 | <p><b>Orders of Hon'ble Appellate Tribunal of Electricity (APTEL)</b><br/>Subsequently, PNGRB vide its order dated 30.12.2016 has declared capacity of EWNGPL of EWPL for the period from 01.04.2010 to 31.03.2011 and 01.04.2011 to 31.03.2012 as 85 MMSCMD and 95 MMSCMD respectively...</p> | <p>As you are aware, the referred order dated 30 Dec 2016 declaring EWPL capacity for 2010-11 and 2011-12 as 85 mmscmd and 95 mmscmd has been challenged by EWPLL at APTEL which is yet to be heard and decided on merits.</p> <p>It may be recalled that the earlier capacity order dated 10.07.2014 in which capacities were declared same as above had been challenged by EWPLL and were remanded back to PNGRB by APTEL on the grounds of natural justice. In this dispute, APTEL granted stay on use of 95 mmscmd for tariff determination. Since the dispute still remains same as on date and has not been heard / resolved on merit, it is submitted that the use of 95 mmscmd capacity for all balance years starting with 2011-12 would not be appropriate.</p> <p>It is submitted that EWPL neither in the past nor now have the capacity to transport volumes of 95 mmscmd under the then as well as present operating conditions. This fact has been observed in the Capacity Assessment Group report.</p> <p>The 95 mmscmd capacity corresponds to a higher entry point pressure (80 - 98 barg) which was formally revised and implemented contractually to a realistic range of 35 - 40 barg since April 2014. The exit pressure range at Oduru was also revised to 45 - 52 barg from 60 - 72 barg at the same time to reflect accurately the prevailing conditions in the pipeline. Hence, the key interpretational dispute on contractual vs operating pressure does not remain post April 2014.</p> <p>It is further submitted that the capacity applications for years subsequent to 2011-12 have been pending at PNGRB end since long. It would be prudent to first declare capacities for the subsequent periods and then use the latest capacity for the balance years for determination of tariff.</p> |
| 7.2.1             | <p><b>Actual Capex (Including Pre-Commissioning Cost)</b></p>  | <p>PNGRB has cited EWPLL's submission relating to the Revalued assets and Additional charge of depreciation as response to PNGRB's request for reconciliation.</p>  |

