

GGL/CEO/2019-20/C&M/21 June 20, 2019

To.

Ms Vandana Sharma.

Secretary,

Petroleum and Natural Gas Regulatory Board ("PNGRB/Board"),

1st Floor, World Trade Centre,

Babar Road.

New Delhi - 110001

Sub.: Submission of Comments on Public Consultation Document ("PCD") for the tariff order issued by PNGRB for GAIL's Dabhol Bangalore Natural gas Pipeline ("DBNL")

Ref.: 1) PCD bearing reference no: PNGRB/M(C)/73-Vol IV dated 03.06.2019

Dear Madam,

This is with reference to the DBNL transportation tariff Public Consultation Document ("PCD") dated June 03, 2019. Gujarat Gas Limited ("GGL") would like to provide following comments for the kind consideration of the Board.

- a) Point no. 4.2.1 CAPEX for FY 15-16 and FY 16-17 is taken has negative; however no details are provided for the same. GGL seeks clarification regarding the basis of negative CAPEX.
- b) Point no. 4.2.2 GAIL has taken future CAPEX of Rs. 352.68 Crore for additional connectivity while in the PCD there are no details about bi-furcation regarding each connectivity cost and its assumptions. Further we request the Honourable Board to ensure that the proposed connectivity are not part of GA authorised to CGD entity.
- c) Point 4.3 GGL requests clarification on Cost of Gas considered while determining the line pack value.
- d) Point 4.4.1 GGL requests to provide basis of segregation of Corporate Expense for the subject pipeline.

GUJARAT GAS LIMITED (A GSPC Group Company – Government of Gujarat Undertaking) (Formerly known as GSPC Distribution Networks Limited)

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