

9th November 2020

Ms Vandana Sharma,
 The Secretary
 Petroleum and Natural Gas Regulatory Board (PNGRB)
 1st Floor, World Trade Centre
 Babar Road, New Delhi – 110001

Subject: Suggestions/Comments/Views on Imbalance Management Services Second Amendment Regulations

Dear Madam,

This is in reference to the Petroleum and Natural Gas Board (Imbalance Management Services) Second Amendment Regulations 2020, we propose the following comments:

General Comments

The charges of using various products (especially parking and lending imbalance services) under IMS are too high. Such high charges impact the feasibility of IMS. A further reduction in price to INR 1.5/MMBTU in case of parking & lending and INR 1/MMBTU in case of netting and trading is recommended. Further it is important to specify what these charges are benchmarked against

Detailed Comments

Sr.No.	Clause No.	Provision as per draft regulations	GMR Comments
1	2. (v)	“(4) The transporter shall charge from the shipper an amount not exceeding rupees fifteen per MMBTU for imbalance management services referred to in clauses (a) and (b) of sub-regulation (1) and an amount not	The regulations mention the IMS charges as INR 15/MMBTU in case of parking & lending service and INR 1.50/MMBTU in case of Netting and Trading service. Such charges seem to be very high and would make IMS less feasible. The charges should be cost competitive in order to increase the feasibility of IMS. Currently, the DDS



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Thanking you,

Yours Sincerely,

Balaji S

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