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Ravindra Agrawal
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GSPL/COMM/2020/

Date: 29.10.2020

The Secretary

Petroleum and Natural Regulatory Board

1st Floor

World Trade Centre

Babar Road

New Delhi – 110001

Subject: Views / Comments on Draft Amendments in PNGRB (Procedure for development of Technical Standards and Specifications including Safety Standards) Regulations 2009

Ref: PNGRB Public Notice PNGRB/Tech/27-PDT4S(1)/2020 (P-1922) dated 8.10.2020

Respected Madam,

At the outset we express our sincere thanks to the Hon'ble Board for giving us an opportunity to submit our views / comments on the Draft Amendments in PNGRB (Procedure for development of Technical Standards and Specifications including Safety Standards) Regulations 2009. Our comments are as under :

1. Clause 2-2 states "Thereafter, the work of formulation of new standards shall be undertaken by Board itself or through technical committee".

Clause 2(2) to 2(4) detail the process of doing the work of modification/ revision of standards by technical committee. We request the Board to elaborate the process of amendment of Standards when the Board decides to amend the standards by itself. The Board is also requested to mention the criteria under which such modifications may or may not be referred to Technical committee for modification.

2. Clause 2(5) mentions that The Board may forward the comments received during public consultation to finalise its views on comments received. The Board is requested to elaborate as to whom the comments will be forwarded and when the same will be forwarded
3. Clause 2(7) states that Board may adopt the comments or views of Open House on its own or alternatively refer the comments to technical committee. If the comments are referred to the Technical Committee, then as per clause 2(9), technical committee will prepare and finalize the draft standards for further adoption. Similarly it is requested to also include the process of finalizing the draft standards in case Board decides to adopt the standards after taking decision on the comments or views of Open House.

4. Previously the work of modification/ revision of standards was done by Technical Committee or SDO and then ratified by Technical Committee. Now as per proposed amendments, Board may refer the work of amending the specifications to Technical Committee or Board may do on its own. Accordingly Clause 2(11) may please be appropriately modified.

We hope you will find our comments constructive. We request you to kindly share the weblink to join the Open House discussions scheduled on 3rd November 2020.

With Best Regards,

Yours Sincerely,



Ravindra Agrawal
Group ED (Gas Business)