



Gujarat State Petronet Ltd.

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GSPL/COMM/2018
December 3rd, 2018

The Secretary
The Petroleum and Natural Gas Regulatory Board
1st Floor, World Trade Centre
Babar Road
New Delhi – 110001

Subject: Draft regulations on Petroleum and Natural Gas Regulatory Board (Levy of Fee and Other Charges) Regulations, 2007

Respected Madam,

This is with reference to PNGRB Public Notice dated 01.11.2018 and GSPL's letter dated 01.12.2018 on the subject matter.

In this regard, we would like to submit the following for your kind consideration:

i. Proposed amendment under Clause 4 requires payment of other charges based on the revenue (excluding taxes) earned from each natural gas pipeline.

In this regard, we would like to submit that GSPL has been maintaining books of accounts as per requirement prescribed under Companies Act and Accounting Standards issued by ICAI.

In accordance with the same, GSPL has been undertaking consolidated booking of revenue earned from transmission service from all its natural gas pipelines (i.e. High Pressure Gujarat Gas Grid and Low Pressure Gujarat Gas Grid). As you may be aware, GSPL does not book its revenue based on individual natural gas pipelines.

In view of the above, PNGRB is requested to consider levy of other charges from an entity **based on total transportation revenue earned and not based on revenue earned from individual natural gas pipeline.**

ii. Levy of fee proposed for laying spur line should be applicable to the spur line falling outside the tariff zone only.

Thanking You

Yours sincerely,

Devendra Agarwal
GM (Commercial)