



HPCL SHAPOORJI ENERGY PVT LTD

Ref. No. HSEPL/REG/PNGRB/2019/012

Date: 29th August 2019

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

Subject : **Comments on Public Notice dated 02.08.2019 regarding Tariff review, under the provisions of the Petroleum and Natural Gas Regulatory Board (Determination of Natural Gas Pipeline Tariff) Regulations, 2008.**

Dear Madam,

This has reference to the subject public notice web hosted on 2nd Aug 2019 on the PNGRB website. In this regard we wish to submit the following for your kind consideration.

Integration of pipeline network and combining tariff on selective basis for a particular entity may give advantage to that entity while meeting the demand of a common market. This would adversely impact development of new Terminals which are going to be connected to new pipelines, if these pipelines are left out of the exercise of unification/integration. This would affect the investments in new Terminals and new Pipelines.

Any amendment in tariff determination methodology must be guided by factors which will encourage competition, by determining tariffs in non-discriminatory nature. In other words, tariff determination methodology or consequences of such exercise must not benefit any one entity, as will happen, if the tariffs are combined selectively for only a few pipelines serving a market.

In view of above, PNGRB may like to consider unification/ integration (by way of Unified/Pooled Tariff of all the inter-connected cross-country natural gas pipelines (including bid-out pipelines) in the proposed amendment in the PNGRB (Determination of Natural Gas Tariff Regulations 2008).

With best regards.

Yours truly,
For HPCL Shapoorji Energy Private Limited,

S. Baitalik
24/8/19
S. Baitalik
VP-Projects