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| PNGRB/..... |
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Ref. No PIL/PNGRB/PCD

1602/2019/0/05004
Date: 1st August, 2019

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

JACRET
48/19
DCCTKCJ

Sub.: Public Consultation Document(PCD) on tariff review of GAIL's Kochi-Koottanada-Bangalore-Mangalore Natural Gas Pipeline(KKBMPL).

Dear Madam,

This is in reference to PNGRB PCD dated 16th July,2019 seeking comments of stakeholders on GAIL's tariff filing on KKBMPL. PIL views on the same are as below:

1. Board may standardize the format for submission of tariff application and introduce the mechanism of online submissions. This will not only save time but will also simplify the scrutiny process.
2. **Clause 4.4 Unaccounted Gas:** As deliberated on various occasions unaccounted gas is the inherent feature of the gas pipeline operations and is a cost to the transporter for operating the pipeline system. Therefore, PNGRB is requested to kindly allow the same in the tariff workings.
3. **Clause 4.11 Zonal Apportionment:** It is suggested that a mechanism may be developed to seek zonal apportionment from the entity once tariff review exercise is completed by the Board and tariff order may be issued conveying both levelized and zonal tariffs.
4. As of now there is no other specific comments to offer, however, to share our views in detail we would like to participate in the open house, to be conducted by PNGRB on the subject matter.

Thanking you

Yours faithfully

For Pipeline Infrastructure Limited


Neeraj Pasricha
Authorised Signatory

Pipeline Infrastructure Limited

(Formerly known as Pipeline Infrastructure Private Limited)

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