

# Pipeline Infrastructure Private Limited

CIN: U60300MH2018PTC308292

Date: 6<sup>th</sup> March, 2019

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

309/sey  
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PNGRB/7636
DI: 8/3/19

Subject: Public Notice regarding request of M/s IMC Limited for Extension of Kakinada-Vijayawada-Nellore Natural Gas Pipeline.

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8/3  
AA(AK)  
2019  
11/3

Dear Madam,

AA(AK)/1-3574  
11/03/2019

This is in reference to Public Notice dated 8<sup>th</sup> Feb, 2019, issued by PNGRB, seeking views of the entities on the proposal of M/s IMC Limited for the Extension of Kakinada- Vijayawada-Nellore natural gas pipeline. In this regard following is submitted:

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1. As per IMC letter, the Pipeline was authorised for 18 mmscmd, with gas sources envisaged from LNG FSRU and GSPC deep water gas. The project seems presently under route survey stage.
2. Present proposal is for extension of pipeline under clause 21(2). As mentioned in the proposal major gas flow is expected to be from this proposed extension.
3. Before deciding on the proposal, it may be necessary to deliberate on the likely implication of the proposal on the different aspects of the regulations as given below:
  - a. Whether this proposal should be dealt under clause 21(1) i.e. Tie In connectivity or clause 21(2) i.e. Extension.
  - b. The impact of the proposed extension on the expansion of the capacity of the pipeline also needs to be seen. Further, upfront clarity and acceptance would be required on the tariff of the gas pipeline post expansion and the

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- volume on which such tariff would be applicable in view of the clause 12 (2) of the Authorisation regulations which stipulate 50% sharing of revenues.
- c. Entity has requested for extending starting point. The implication of the same on the "point of origin" in terms of clause 2(h) "Tariff Zone" of the Authorisation regulations and consequent demarcation of zones along the route of the pipeline needs to be examined.
  - d. Whether such extension will result in change of zone and the consequent tariff for the customers. If there is any increase in tariff due to change in zone, whether the same incremental revenue would also be considered for the purpose of clause 12(2) of the Authorisation regulations.
  - e. Whether this proposal to allow to extend the pipeline before the same is laid as per the original bid will tantamount to change in bidding conditions after the award.
4. We request you to grant an opportunity to explain our viewpoints in detail in the open house on the subject.

For and on behalf of

**Pipeline Infrastructure Private Limited**



**Emani VS Rao**

**Director**