

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

Sub: Public Notice (PNGRB/COM/2-NGPL Tariff (2)/2012(P-xxx)) dated 17th Oct'2020 seeking comments/ views on the proposed draft Amendment to the Petroleum and Natural Gas Regulatory Board (Imbalance Management Services) Regulations, 2016.

Dear Madam,

We thank you for coming up with the abovementioned Public Notice on draft Amendment to the Petroleum and Natural Gas Regulatory Board (Imbalance Management Services) Regulations, 2016.

RGPL appreciates the continuous endeavour of PNGRB to align the Natural Gas Industry of the country with the appropriate international standards and practices. RGPL supports the proposed amendment as this will help Shippers to efficiently manage the imbalances in a planned and predetermined manner. We have reviewed the amendments proposed under Annexure-2 of the Public Notice and our comments are as under:

1. Imbalance Management Service Charges: Sub Regulation 5 of Regulation 4

In our view, Honourable Board should allow pipeline entities to retain entire revenue generated from the imbalance management services proposed under the amendment. This will encourage the entities to proactively offer the proposed services to Shippers and help effective implementation of the regulation. This would also be of immense help for small pipeline like SHPPL with a limited customer base.

2. OBA for Imbalance Management: Sub Regulation 9 of Regulation 4

We understand that OBA will primarily help the Shipper using two interconnecting pipelines having Operational Balancing Agreement in managing imbalances on such interconnected pipelines. We request PNGRB to further elaborate on the OBA provisions with respect to payment of imbalance management charges and transportation charges by the Shipper availing IMS and transportation services from the transporters of the interconnect point.

We hope PNGRB would consider the above suggestions while finalising the regulations. We remain available to provide further clarifications as may be required by PNGRB.

Yours faithfully,

For and on behalf of
Reliance Gas Pipelines Limited



Name: Milind Narkhede