



May 11, 2020

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

**Subject : Comments on Draft amendments on "PNGRB (Technical Standards and Specifications including Safety Standards for City or Local Natural Gas Distribution Networks) Regulations, 2008"**

**Ref. : PNGRB Public Notice dated 03.03.2020, 13.03.2020, 13.04.2020, 29.04.2020 and 05.05.2020 regarding the abovementioned amendments**

Dear Madam,

With reference to the abovementioned subject and referred public notices of PNGRB, comments on the draft regulations are enclosed herewith as **Annexure 1**.

This is for your favorable consideration please.

Yours sincerely,  
For Adani Gas Ltd.

*K. D. Rawal*

(Authorized Signatory)



Encl: As above

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**Clause-wise Comments on the Draft amendments on "PNGRB (Technical Standards and Specifications including Safety Standards for City or Local Natural Gas Distribution Networks) Regulations, 2008"**

1.0 Regulation 2 (g)

Comments:

- It is evident from the draft regulations that through the amendment in the definition of CGS, PNGRB intends to allow establishment of CGS outside the GA.
- Secondly, PNGRB also is proposing to consider the pipeline laid from the CGS to the GA as part of the CGD network.
- We support both the insertions in the draft amendment in that respect.
- However, there will still be ambiguity with respect to the line from the natural gas pipeline tap-off point to the CGS. If the same is built by CGD entity, then the same should also be considered as a part of CGD network. AGL has earlier sought permission from PNGRB to allow it to set up CGS outside GA as tap-off is very far. But PNGRB directed it to establish CGS within GA only and is therefore laying pipeline from tap-off to CGS as well extending upto 15 to 20 km in some cases.
- For giving ample clarity and avoiding of any ambiguity, it is suggested that the draft amendment may be changed as follows.

*"Provided that, CGS would preferably be established within the GA. However, if CGS is established outside the Authorized Geographical Area then pipeline connecting from CGS to authorized CGD network as well as pipeline from tap-off point to the CGS (if built by CGD entity) shall be considered as a part of CGD network, however the authorized entity shall not supply any customer from the pipeline outside its geographical area.*

*Provided further that the inch-km of such pipeline laid from Tap-off point to CGS and CGS to GA both depending upon whether CGS is outside or inside GA would be considered for the purpose of MWP for the GA, as applicable."*

### Comments on the Annexure -I - Gas Supplies to High Rise Multi Occupancy Buildings – Draft Guidelines

#### 2.0 Clause 2.0- Scope

Comments:

- 'High rise' needs to be defined
- In Annexure I under the title **"WHEREAS"** point no 1. Buyer & Seller Agreement should be for supplying of PNG should be "Domestic" as per clause 2.0 instead of Industrial & Commercial purpose & production facility should be "Domestic Premise" as per clause 2.0 instead of Hotel/facility.

#### 3.0 Clause 4.0- General

Comments:

(a) MOC of risers and laterals related activities should be as per T4S guideline.

(c) Risers to be installed near kitchen balcony. Various utilities in duct will corrode our pipeline.

Similarly, difficulty in maintain safe distance if electrical cables also passing through same duct.

(d) It should be 110 mbar and upto 4 bar till riser regulator.

(e) PE portion should be protected with RCC/HDPE guard /Brick Chamber with proper sand filling upto TF joints. PE portion of 0.3m above ground should be protected.

(f) Not required as it may increase joints & gas stealing. Pressure testing can be done through any of lateral tapping.

#### 4.0 Clause 5.0– Meter Positions

Comments:

(a) Preferred location should be kitchen balcony. Meter location to be examined for thermal and ultrasonic meters.

(b) Maintaining ventilations and ventilation conditions are not fixed. Customer tends to make changes in ventilated areas.

### 5.0 Clause 3.0(a) – Regulation and Standards

#### Comments:

Board should recommend general guidelines irrespective of GA. There is mention of Mumbai at many instances.

### 6.0 Clause 6.0 – Meter Control Valve

#### Comments:

MCV should be easily accessible whenever needed.

### 7.0 Clause 7.0 – Planning & Design of Riser

#### Comments:

(d) We apprehend that specification of shaft as mentioned here is followed everywhere. It will be better if this specification of shaft is made part of National Building Code and enforceable. Even after this question of old buildings (i.e. existing prior to such code becoming applicable) remains unattended.

(c) Consideration may be given to wrapping the pipe with electrical insulation tape/PVC Sleeve for protection against electrical short circuiting.

### 8.0 Clause 8.0 – General Guidelines and Stress analysis

#### Comments:

(b)  $40 \times 365 = 14600$  or 14610 inclusive of leap year days

### 9.0 Clause 9.0(b) – Laterals

#### Comments:

Tee Joint should be of socket welded type from riser to tapping connections. At one end later pipe should be connected with riser through welded joint and other end of lateral pipe should be of threaded type. Rest all joints in laterals piping shall be of threaded type.

### 10.0 Clause 10.0(c, d, e, f, g, h, i) – Ventilation

#### Comments:

It is difficult to find building management system in all type of building all over India. Even in metro cities, such buildings are very limited. Any alteration or modification in riser or lateral shall be carried out by an authorized person of the entity

It is suggested to reword the sub clause (f) as follows.

The responsibility of the operation, maintenance and functioning of the equipments shall always be with the builder / society, and the CGD entity shall be indemnified for any untoward consequences resulting out of the malfunctioning of any of such systems / equipments and any non-compliance and/or violation of any of the Compliance's stipulated in the NOC by Builder/Society. Commissioning shall be undertaken only when Indemnity bond is submitted by Authorized Signatory of the Customer in the format attached herewith at Annexure 1. Indemnity bond is to be notarized on Rs. 200 non-judicial stamp paper in original. First & last page should be notarized & stamp of Notary shall be available for each page.....

11.0 Clause 14.0(c) – SS Tubes and Fittings

Comments:

PNGRB should approve SS tubing's with GI and copper tubing's materials. Case to case approval is not possible.

12.0 Clause 15.0 - Records.

Comments:

(a) It should not be made mandatory requirement.

(b) To be submitted by contractors appointed by CGD entity after completion of work.

13.0 Annexure I - PROFORMA INDEMNITY BOND

Suggested insertion as follows to bring clarity on the scope of indemnity.

3. BUYER shall be solely liable for any type of loss or injury which any person may sustain or for any action by any statutory authority by reasons of any non-compliance of the conditions, terms of the NOC and for any untoward consequences resulting out of the malfunctioning of any of such Buyer's systems / equipments.

6. The BUYER shall be liable to pay to \_\_\_\_ on demand, and shall indemnify \_\_\_\_ against, all liabilities, damages, costs, claims, losses, expenses, demands and

proceedings sustained or incurred by \_\_\_\_ (including any loss of reputation, loss or damage to \_\_\_ and / or its property and those arising from injury to or death of any person) ("Losses") arising directly or indirectly from (i) violation of any of the terms and conditions of the NOC by the BUYER or any of its employees or agents; (ii) any damage or injury to the person or property of any third party caused by any negligence or default of the BUYER or any of its employees or agents in following the compliance directives and/or conditions as mentioned in the NOC; (iii) breach of any of the terms and conditions of the NOC; (iv) any untoward consequences resulting out of the malfunctioning of any of such buyer's systems / equipments (v) any representation or statement the BUYER has made under this Agreement.

Comments on Annexure 2: PNGRB (Providing Gas Connections in Completely Enclosed Buildings i.e. AC Malls, Basements, Multi-tier Building etc.) Guidelines, 2019.

14.0 Clause 5.0- Route Selection

Comments:

Route shall be approved by CGD entity.

"Wherever adequate ventilation is not available at critical public places, customer should carry out risk assessment and implement mitigation measures (one or more of the following) reduce the risk to ALARP and Onus of operation and maintenance of the same shall remain with customer." - As this guideline specifically made for an enclosed building

15.0 Clause 7.0-Installations

Comments:

No such option should be given to customers. There should be separate piping for alternate fuel.

16.0 Clause 8.0-Corrosion protection and markings

Comments:

PVC sleeves to be used instead of PE sleeves.

17.0 Clause 9.0-Inspection and Testing

Comments:

No such option for AGL customers

Board may suggest actions that should be taken by entity if customers fail to submit leak survey every year & Pressure test witnessed by TPA at every 3 years.

18.0 Clauses 11.0- Safety Measures

Comments:

CGD entity is only responsible upto MRS outlet. It is not responsible for IP line.

19.0 Clause No.1.0 - Schedule - 1A MATERIALS AND EQUIPMENT

Comments:

Board may kindly provide some details regarding if any CGD company has been using RTP for underground laying and share the learning and experiences so that we can incorporate in our procedure.

20.0 Clause No.3.0-Annexure II- Metering Equipment:

Comments:

Kindly confirm Ultrasonic meter for domestic is mandatory or we can use existing different such as diaphragm type for our domestic customer

21.0 Clause No.4.0-Annexure II- Metering Equipment:

Comments:

It is very good move to use calibrated meter in closed conduits. Board may kindly provide the further details whether any approved lab for calibration or meter manufacturing facility available in the country.

22.0 Schedule - 1D VALVES

Comments:

There are many hindrances like permission, other underground utility, to install steel valve in an existing network.

As per current practice, we maintain 3 Km distance between Isolation valves and also provides additional valves at each tap-off connection & major crossing. Also periodic maintenance carried out as per set annual plan.



Therefore, Board may kindly review and add the assessment of location class should be 3- or 5-years interval instead of every year as mentioned above in (iii).

## 23.0 Schedule-1E

### PIPELINE SERVICE CONVERSIONS

#### Comments:

Kindly clarify whether it will be required to inform PNGRB whenever entity converts any existing pipeline to NG pipeline. It is also not clear whether any other specific precaution is required to taken during conversion.