

11 May 2020

To,
The Secretary,
Petroleum and Natural Gas Regulatory Board,
World Trade Centre,
Babar Road,
New Delhi – 110001

Subject: Views on Proposed Amendments in the PNGRB (Technical Standards and Specifications including Safety Standards for City or Local Natural Gas Distribution Networks) Regulations, 2008

Ref:

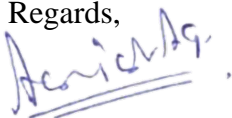
- 1. Public Notice dated 3 March 2020**
- 2. Public Notice dated 13 March 2020**
- 3. Public Notice dated 26 March 2020**
- 4. Public Notice dated 13 April 2020**
- 5. Public Notice dated 29 April 2020**
- 6. Public Notice dated 5 May 2020**

Respected Madam,

In reference to the said public notices, our point wise views/comments on the proposed amendments are attached as Annexure 1.

Submitted for your kind consideration please.

Regards,



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Annexure 1

Views on Proposed Amendments in the PNGRB (Technical Standards and Specifications including Safety Standards for City or Local Natural Gas Distribution Networks) Regulations, 2008

S. No.	Proposed Amendment	Views/Comments
1	2 (g) “Provided that if CGS is established outside the Authorized Geographical Area then pipeline connecting from CGS to authorized CGD network 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”	<p>Suggested changes in the proposed Amendment Regulations:</p> <p>“2 (g) CGS has to be established at the periphery or within the boundary limits of authorized geographical area.</p> <p>In case, sub-transmission pipeline owned by the CGD entity, that CGD entity shall not supply to any customer using its infrastructure outside its authorized geographical area, till the infrastructure exclusivity of the authorized entity from whose authorized geographical area, another CGD entity’s sub-transmission pipeline passes through, remains”</p> <p>Rationale:</p> <ol style="list-style-type: none">1. As per the PNGRB Regulations, “City Gate Station” is a part of the primary network of a CGD network. An authorized entity is only allowed to lay, built, operate or expand primary CGD network only within the boundary limits of authorized geographical area.Therefore, it is suggested to allow for the establishment of CGS at the boundary or within the relevant geographical area.2. Even in the Schedule 1D of the PNGRB Technical Standards Regulation, PNGRB has suggested that “As far as possible the city gate station (CGS) shall be installed at the periphery of populated area.3. Further, under Reg 2 (q) of the PNGRB Technical Standards Regulations, sub-transmission pipeline is defined as high pressure pipeline connecting the main

		<p>transmission pipeline to the city gate station but is owned by the CGD entity.</p> <p>In case, city gas station is established outside the geographical area near to the main transmission pipeline and then a pipeline shall be constructed to connect the geographical area, then it is not a sub-transmission pipeline and the said pipeline becomes a primary network of CGD and should only be allowed within the boundary limits of authorized geographical area.</p> <p>4. In case CGS would be allowed outside the boundary limits of geographical area, it is a breach of infrastructure exclusivity of the authorized entity from whose area pipeline connecting CGS and geographical limits is passing through</p> <p>5. In case CGS would be allowed outside the boundary limits, pipeline connecting CGS and the geographical limits always possess the threat to marketing and infrastructure exclusivity of the authorized entity from whose area pipeline connecting CGS and geographical limits is passing through.</p>
Annexure A- Sub-committee views on Proposed Amendments in PNGRB T4S CGD Regulations		
2	<p>Sl. No 1 “Reinforced Thermoplastic Pipes (RTP), if used shall conform to API RP 15S. All pipe and fitting shall meet the requirements as per standards and testing methods prescribed in API 15S”.</p>	<p>Request to provide details on process of jointing of RTP with fittings and valves and indicate standards / guidelines to be referred.</p>
3	<p>PNGRB T4S CGD Regulations, Schedule 1D - Design, Installation and Testing (a) City Gate Station Notes: “Facility shall be provided with proper boundary wall /</p>	<p>Requesting for guidelines on type and height of outer Boundary wall to be installed in CGS area and CNG Dispensing area.</p> <p>It is proposed to have outer Boundary Wall of 2.4 M height with 0.6 M barbed wire in CGS area and 2.0 M</p>

	fencing with gate(s) in line with MHA (Ministry of Home Affairs) guidelines.”	height with 0.6 M barbed wire in CNG Dispensing area.
Annexure I- Gas Supplies to High Rise Multi Occupancy Buildings)		
4	Clause No. 12 “Pipe passing through walls should be in accordance with PNGRB T4S regulations.	Request for allowing concealed piping within walls in case of new construction. Extra safety precaution like testing of pipeline at higher pressure can be undertaken.
5	Annexure I- PROFORMA INDEMNITY BOND- Point 1 “BUYER & SELLER had entered into an Agreement dated_____ (hereinafter referred to as the “Contract”) for supplying of Piped Natural Gas (“PNG”) for Industrial / commercial purposes at their production facility/ hotel / situated at-_____(hereinafter called “Premises”).”	This proforma indemnity bond should pertain to high rise building instead of PNG for Industrial / Commercial purposes at their production facility/ hotel.
6	Clause No. 2 “This document suggests guidelines which may be referred for installation of the pipe-work between the Service Regulator (SR) up to and including the steel reinforced rubber hose installed inside the kitchen of the domestic customer, and includes the risers and laterals systems supplying gas to high rise multi occupancy buildings (domestic premises), to facilitate supply of gas to the domestic customers.”	The minimum no. of floors to qualify for high rise multi occupancy building is not mentioned. It is requested to intimate the same.
7	Clause No. 4. (e) “PE portion of a service terminates at the crimp fitting approximately 0.5 Metres above ground and thereafter	Request to reduce the termination height up to maximum of 0.25 Metres.

	changes to galvanized steel pipe. The RIV is located at height of 1.5 Metres from ground level. The PE portion of 0.5 Metres above ground is protected with anti-rodent HDPE sleeve and RCC crimp guard.”	
Annexure II- Providing Gas Connections in Completely Enclosed Buildings i.e. AC Malls, Basements, Multi-tier Building etc.		
8	<p>Clause no. 3. (2) “These guidelines cover the general recommendation for material selection, safe installation, inspection / testing are to be carried out prior to commissioning of the facilities at the downstream of MRS up to appliance point for new as well as for the cases where alterations are required”</p> <p>Clause No. 3. (7) “Wherever underground PE pipeline is laid, PNGRB T4S for CGD network standard shall be referred.”</p> <p>Clause No. 5. “The IP line should be installed aboveground due to reasons attributed to the safety, integrity, ease in inspection, O&M and to avoid corrosion.”</p>	<p>Clause No. 3. (7) states that PE pipeline can be laid underground as per PNGRB T4S. Whereas Clause no. 5, mentions that pipeline downstream of MRS should be installed aboveground.</p> <p>Request confirmation whether pipeline downstream of MRS is to be laid below ground or above ground.</p> <p>In case the burner points is far off from MRS and there are minor road crossings in between than underground PE pipeline would be preferred compared to aboveground GI pipe.</p>
9	<p>Annexure 1: Material Standards and specifications).</p> <p>Sl. No. 2- Item PE pipes and fittings and valves (underground), Specification is for “PE100/ PE80 grade, as</p>	IS 14885 is not mentioned and may be added.

	per IS ISO 4437-2, ISO 4437-3 and ISO 4437-4 standards”	
10	Annexure 1: Material Standards and specifications). Sl. No. 6- Item PE fittings, Specification is for “ISO 4437-3”.	EN 1555 Part 3 is not mentioned and may be added which is as per PNGRB T4S.