

TGPL/Comm/2020-21/004
May 11, 2020

To,
The Secretary,
Petroleum and Natural Gas Regulatory Board (“**PNGRB/ Board**”),
1st Floor, World Trade Centre,
Babar Road, New Delhi – 110001

Sub.: Comments on Draft PNGRB (Technical Standards and Specifications including Safety Standards for City or Local Natural Gas Distribution Networks) Amendment Regulations, 2008.

Ref.: 1) Public Notice dated 13.03.2020
2) Gas Supplies to High Rise Multi Occupancy Buildings – Draft Guidelines
3) PNGRB (Providing Gas Connections in Completely Enclosed Buildings i.e. AC Malls, Basements, Multi-tier Building etc.) Guidelines, 2019.

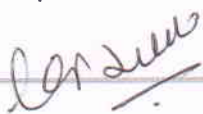
Dear Madam,

This is with reference to above mentioned Public Notice web-hosted by Honourable Board seeking views from stakeholders on the proposed in amendment in T4S Regulations for CGD Network.

In this regard, we would like to submit the views of Torrent Gas Private Limited (TGPL) as under for the kind consideration of Hon’ble Board.

1. Annexure I - PNGRB (Gas Supplies to High Rise Multi Occupancy Buildings) Guidelines, 2019.

- 1.1. Clause 2 provides the Scope of Draft Guidelines on Gas Supplies to High Rise Multi Occupancy Buildings. The Hon’ble Board may consider specifying the minimum height of the building for which these guidelines become applicable in the scope - for instance in UK it is 40 Meters.
- 1.2. Clause 4 provides that meter shall be installed at a proper location to facilitate safe and convenient meter reading and maintenance activities in future. PNGRB may consider specifying meter should not be installed below kitchen platform for the sake of clarity.



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1.3. Clause 5 provides for meter positions. It is suggested that the Hon'ble Board may consider including provisions for Meters installed in clusters at Ground Floor and Intermediate Floors.

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

2.1. Clause 5 provides that the Safe distance should be maintained from utilities like steam line, oil line & electric HT line, hot zones, etc. The Hon'ble Board may consider specifying the safe distances in the guideline.

2.2. Clause 7 provides that all welding should be carried out by qualified welder as per API 1104. The Hon'ble Board may consider specifying only EQT qualified electrodes to be used for such welding.

2.3. Annexure 1 - Material Standards and Specifications:

2.3.1. Point No-7 Flexible Hose - SS braided bellow pipe hoses are corrosive in nature. The Hon'ble Board may consider providing specifications.

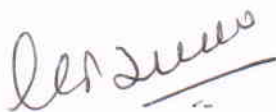
2.3.2. Point No-13 Stud- ASTM A 193 GrB7. It is suggested that B7M stud may be used because of its lower hardness values conforming to API 6D. The Hon'ble Board may consider specifying same.

2.4. C1 of Annexure 3 – Check list (for issuance of Fit for Use Certificate) provides that all welding's are carried out as per API 1104. The Hon'ble Board may consider adding an item "NDE carried out and found satisfactory" in the checklist.

We trust the Hon'ble Board finds our views helpful in framing the regulations and would be happy to provide any further clarifications should they be required by Hon'ble Board.

Thanking you.

For Torrent Gas Private Limited



Utkarsh Bhatt
Vice President (Commercial)