

June 20, 2020

The Secretary
Petroleum & Natural Gas Regulatory Board
1st floor, World Trade Centre
Babar Road
New Delhi – 110 001

Sub: Views on Determination of Natural Gas Pipeline tariff Regulations 2008 web hosted on 29th April 2020 by PNGRB

Ref: - Public notice no. PNGRB/COM/2-NGPL/Tariff (3)/2019 Vol-II

Dear Sir/ Madam

We have following observations with reference to the Public Notice dated 29.04.2020 issued by Hon'ble Board for inviting views on aforesaid subject.

- 1) We refer to the Public Notice on Draft Amendment of Petroleum and Natural Gas Regulatory Board (Determination of Natural Gas Pipeline Tariff) Regulations, 2008 ("Tariff Regulations") wherein views/ suggestions are invited regarding exclusion of some of the existing provisions viz :

exclusion of provisions of regulation 12 and regulation 21 of Petroleum and Natural Gas Regulatory Board (Authorizing Entities to Lay, Build, Operate or Expand Natural Gas Pipelines) Regulations, 2008 for the purpose of determination of tariff in respect of 'cost-plus' natural gas pipelines and also on whether or to treat interconnection between two natural gas pipelines as extension/ expansion/ tie in.

Since the Hon'ble Board is already evaluating the possibility of excluding the above provisions, we also support the exclusion of these provisions for the purpose of tariff determination. This will benefit all the new LNG terminals that are coming up in Gujarat and other parts of the country and will boost expansion of existing pipeline infrastructure keeping transportation tariff reasonable.

- 2) We would like to request Hon'ble board to ensure that additional capacity created by under these regulations remains available to users on common carrier basis as per PNGRB guidelines.

We look forward to meeting you during the proposed open house discussion.

Thanking you,
Sincerely,
For **Adani Total Pvt. Ltd.**,



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