



Unison Enviro Private Limited

Ref: UEPL/PNGRB/CGD/Ratnagiri/2019-20/7848  
Date: 13<sup>th</sup> September, 2019

AA/ARJ on tour  
13/9/19.

file  
13/9/2019

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

Kind Attn.: Mrs. Vanadna Sharma

Subject: Draft regulation on Contract & Common carrier.

Dear Ma'am,

This is with reference to draft regulations on Common & Contract carrier put up on the website and requesting for comments from public or the effected parties.

Para 12 of the draft regulation stipulates that post expiry of exemption from purview of common & Contract carrier the exclusivity for CNG infrastructure will also expire. It further stipulates that any entity can develop CNG or L-CNG station in an authorized entity's authorized area subject to an access agreement with us or can be directly authorized by Board.

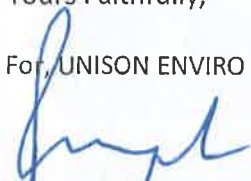
We request this provision make be deleted as:

1. An entity is authorized exclusivity for infrastructure for 25 years after following the due process of tender, competitive bidding, financial closure .The DFR submitted for financial closure outlines an entity's plans, business model, and revenue generation in detail .This is also duly accepted by the board.
2. Unilateral withdrawal of Infrastructure exclusivity may lead to legal complications.
3. It will seriously effect the economic viability of the authorized entity especially for servicing the domestic consumers.
4. An authorized entity develops infrastructure against all odds and just when the project is ready to take off it realizes that a major part of revenue generation is in jeopardy.

Hope for a due consideration of our request in the larger interest of authorized CGD entities.

Thanking You,  
Yours Faithfully,

For, UNISON ENVIRO PRIVATE LIMITED

  
Piyush Gupta



Chief Operating Officer

Regd. Office : 807, 8th Floor, The Cavalli, Plot No. C-70, G Block, Bandra Kurla Complex, Bandra (E), Mumbai - 400 051  
Tel. + 91 22 67399700 • www.ashokabuildcon.com

Corporate Office : Ashoka House, Ashoka Marg, Ashoka Nagar, Nashik 422 011, Maharashtra, India • Tel +91 253 3011705

• Fax +91 253 2236704

CIN: U40300MH2015PTC271006