

Subject: **FW: Comments on Public Notice No: Infra/CGD/Bidding Criteria/ Open House on 13.02.2018** Date: 10/02/18 01:08 PM
 To: secretary@pngrb.gov.in From: BAKDE C R <bakdecr@sabarmatigas.com>

Comments on Public Notice No: Infra/CGD/Bidding Cr... (448kB)

SGL Comments 07.02.2018 PNGRB.pdf (331kB)

Belum tentu may be given to web host on comment and call parties
Secretary
Vandana Sharma
12.2.2018
Member (I&T)
(Signature)

From: BAKDE C R [mailto:bakdecr@sabarmatigas.com]

Sent: 09 February 2018 10:22

To: 'secretary@pngrb.gov.in'

Cc: 'ramanakumara@sabarmatigas.com'; 'ramanakumara@bharatpetroleum.in'; 'Rohan A. Sharma'

Subject: Comments on Public Notice No: Infra/CGD/Bidding Criteria/ Open House on 13.02.2018

Respected Madam,

SGL had submitted comments on the above referred Public Notice . However it is observed that the same are not webhosted.

In view of our submission of the comments, SGL may be allowed to attend the Open House on 13th Feb 2018 .

We solicit your kind confirmation please.

Thanks & Regards,

C R Bakde
 Manager - Commercial
 Sabarmati Gas Limited
 (A Joint Venture of GSPC & BPCL)
 Plot No. 907, Sector-21, Gandhinagar
 Phone: 079 - 6673 7613, Fax: 079 - 2324 3467
 Mobile: 9985211641,
 Email : bakdecr@sabarmatigas.com

----- Original Message Comments on Public Notice No: Infra/CGD/Bidding Criteria dated 16.01.2018.eml -----

Subject: Comments on Public Notice No: Infra/CGD/Bidding Criteria dated 16.01.2018
 From: "BAKDE C R" <bakdecr@sabarmatigas.com>
 Date: Wed, 7 Feb 2018 17:49:34 +0530
 To: <secretary@pngrb.gov.in>
 <ramanakumara@sabarmatigas.com>, <ramanakumara@bharatpetroleum.in>,
 Cc: <bhardwajd@sabarmatigas.com>, <patelpn@sabarmatigas.com>, "Rahul Mutha"
 <muthara@Sabarmatigas.com>, "Rohan A. Sharma" <sharmara@sabarmatigas.com>

Madam,

Please find attached SGL comments on the subject matter.

Thanks & Regards,

C R Bakde
 Manager - Commercial
 Sabarmati Gas Limited
 (A Joint Venture of GSPC & BPCL)
 Plot No. 907, Sector-21, Gandhinagar
 Phone: 079 - 6673 7613, Fax: 079 - 2324 3467

Mobile: 9985211641,
Email : bakdecr@sabarmatigas.com



Sabarmati Gas Ltd.
(A Joint Venture of GSPC & BPCL)

No: SGL/PNGRB/17-18

7th Feb 2018

To,

The Secretary,
Petroleum and Natural Gas Regulatory Board,
1st Floor, World Trade Centre,
Babar Road,
New Delhi- 110001

Subject: Comments on Public Notice No: Infra/CGD/ Bidding Criteria dated 16th Jan 2018

Respected Madam,

This has reference to the above referred public notice vide which comments were sought by PNGRB from the stakeholders on the Draft CGD authorisation regulations.

In this regard, enclosed please find herewith comments from Sabarmati Gas Limited as Annexure-I for kind consideration of PNGRB.

Thanking You,

Yours Faithfully,

C R Bakde
Manager Commercial

Comments on PNGRB Draft Guidelines for Bidding for CGD

S No.	Particulars	Clause	Comments
1	Application	3 (2) a	Customers having requirement of natural gas up to 1,00,000 SCMD shall be supplied through the CGD network.
2	Bidding Criteria	7(1) and 7(2)	PNGRB may please provide basis for arriving Transportation rate for CGD of Rs 25/MMBTU and Transportation rate for CNG of Rs 1.5/Kg
		7(3)	PNGRB may provide clarity on type of CNG station (OLS/DBS)
		7(4)	To avoid irrational high PNG connections numbers, PNGRB may find out some solution.
		7(5)	Inch- Km of target should cover Steel as well as MDPE pipeline.
3	Marketing Exclusivity	12	Marketing Exclusivity period should increase to 10 years and extendable up to 2 more years. Reason being, as CGD is capital intensive project, thus recovery of capital cost and recurring maintenance cost would require sufficient time. Further, as network exclusivity is for 25 years, the entity should have exclusive rights to at least half of network life.
4		16 1 (C)	Reference of other terms & condition should be clearly mentioned as failure to achieve the minimum criteria can attract penalty of cancelation of authorization.
5		16 (3)	In case of shortfall in achieving work program targets predetermined penalties are imposed. However following concerns should be addressed by PNGRB. <ul style="list-style-type: none"> 1. Prior notice and hearing should be made. Any penalty should be imposed based on explanations provided by entity. 2. Penalties should not be calculated year wise as proposed in draft regulation. Review should be taken yearly and warning should be issued if targets are not achieved. Levy of penalty should be done only after end of 5 years based on cumulative target till 5 years. For non-achievement of yearly targets, the entity would already have disqualified for additional exclusivity extension, which itself is penalty of the entity.