APGDC
ANDHRA PRADESH GAS DISTRIBUTION CORPORATION LTD

Lr. No. APGDC/TECH/6106/PNGRB/2013-14/031/213

14th Feb 2014

Recd. on 17/2/14.
17/2/14

To
The Secretary,
Petroleum and Natural Gas Regulatory Board,
1st Floor, World Trade Centre,
Babar Road,
NEW DELHI -110001.

Sir,

Sub: Comments/ observations of MWP as proposed by PNGRB for CGD Bidding.

Reference: 1) Public Notice No. PNGRB/CGD/BID/4/2013-1-B, dated 16th Jan 2014.

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At the very outset, we are immensely thankful to you for giving us an opportunity as a stake holder for reviewing and submitting our views for discussion in the ensuing meeting of PNGRB with all stake holders.

We had gone through carefully the entire document with all attachments to it. It is pertinent to bring here the basis for arriving at inch-Kilometer and infrastructure for PNG domestic connections vary largely for the entire district when compared to cities/ towns. Moreover, there is large difference in population density between district headquarters and rest of GA. It is also noteworthy that people opting to switch over from LPG to PNG will be less in number, as there is no commercial advantage. The payback period for the two areas as specified varies greatly. Considering, all the points as stated herein, the project may become unviable.

Accordingly, we submit our comments as per Annexure I for your perusal.

Thanking you,

Yours faithfully,

14/02/14

S. NARAYANAN

Encl.: √Annexure - I

ANDHRA PRADESH GAS DISTRIBUTION CORPORATION LTD
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ANNEXURE - I

Public Notice No: PNGRB/CGD/BID/4/2013-1-B, dt. 16th Jan 2014	
S. No	**Comments on MWP as given in Public Notice as cited above with respect to entire district as one GA.**
A	**Infrastructure for PNG domestic connections:**
1	PNGRB shall indicate the base year census as 2011 for computing data for Infrastructure PNGRB
2	Whenever, EOI is sought by PNGRB for part GA of district, wherein, already a major city is authorized for City Gas Distribution, the effective population to be considered for calculation shall be indicated by PNGRB. For example, M/s. BGL has been authorized to lay, build, operate Hyderabad GA (Geographical Area). Part of Rangareddy District and parts of Medak Districts were added to Hyderabad GA, thereby, there shall be variation in arriving at population of Rangareddy and Medak Districts excluding authorized GA of said districts. PNGRB shall publish the population to be considered against these two districts.
B	**Inch-Kilometer of pipeline:**
1	PNGRB shall indicate the base year census as 2011 for computing data for Inch-Kilometer of pipeline.
2	Whenever, EOI is sought by PNGRB for part GA of district, wherein, already a major city is authorized for City Gas Distribution, the effective area to be considered for calculation shall be indicated by PNGRB. For example, M/s. BGL has been authorized to lay, build, operate Hyderabad GA. Part of Rangareddy District and parts of Medak Districts were added to Hyderabad GA, thereby there shall be variation in arriving at area of Rangareddy and Medak Districts excluding authorized GA of said districts. PNGRB shall publish the area to be considered against these two districts.
3	District wise GA is very large when compared to city wise GA. Hence, it is suggested that the multiplication factor 0f 0.5 to 1 may be considered in place of 1.5. Further, instead of entire area of the district, the area of district Head quarter may be considered as target figure for all CAs' of the district (GA).

14/2/14

(S NARAYANAN)

MANAGING DIRECTOR

A.P. Gas Distribution Corp. Ltd. Pariseram Bhavan Hyderabad