Date: 18.05.2018

No.: GAIL/ND/RA/PNGRB/PCD/2018/351898/2051

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

Subject: Comments on Public Consultation Document (Ref. No.: PNGRB/M(C)/IV dated 04.05.2018) regarding Final initial unit natural gas pipeline tariff of EWNGPL.

Madam,

This has reference to the Public Consultation Document (Ref. No.: PNGRB/M(C)/IV dated 04.05.2018) soliciting views of stakeholders on final initial unit natural gas pipeline tariff of East West Natural Gas Pipeline (EWNGPL).

2. In this regard, the comments of GAIL (India) Limited are enclosed herewith as Annexure-1.

Submitted Please.

Yours Sincerely,

(Manoj Jain)
Executive Director (Gas Mkgt.)
E-mail: manojjain@gail.co.in
Annexure-1

Comments w.r.t. Public Consultation Document No. PNGRB/M(C)/IV dated 4th May, 2018 pertaining to Final Tariff of EWPL

1. **Para 7.3.2 (ii):** SUG requirement may be considered in line with the volume divisor considered for tariff computation. Higher volume throughput will require higher compressor running hours and accordingly higher consumption. The same principle may be considered for past period and accordingly actual OPEX (based on the actual SUG consumption due to lower actual volume flow as compared to normative volume flow) may be adjusted based on higher normative SUG consumption. This may be considered on the tariff not recovered on SUG and value as considered in para 7.3.1 (iii) may be adjusted.

2. **Para 7.10:** Due to increase in effective Income Tax Rate as 34.944%, the pre tax rate of return on total capital employed for period 01.04.2018 onwards to be 18.45%.