PL/PJ/CGD/PNGRB/13.4/30

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

Subject: Comments on the draft “PNGRB (Guiding Principles for Declaring City or Local Natural Gas Distribution Networks as Common Carrier or Contract Carrier) Regulations, 2019”

Respected Ma’am,

This has reference to the Public Notice Ref. No.: PNGRB/AUTH/7-MISC(3)/2015 dated 22 August 2019, soliciting comments on proposed draft regulation on “PNGRB (Guiding Principles for Declaring City or Local Natural Gas Distribution Networks as Common Carrier or Contract Carrier) Regulation 2019”

The observations of IndianOil on the subject regulation are as below:

The entity using the common carrier or contract carrier capacity would face operational complexities during the actual utilization of the CGD network. Therefore, clarifications in the guidelines are solicited from the Board to enable companies to operate in GAs where the CGD network has been declared as common carrier or contract carrier and to incorporate following:

a) Domestic Gas allocation shall be done to the entity which intends to provide Natural Gas to Domestic PNG/ CNG customers.

b) In addition to 20% of CGD capacity through common carrier network, sale of CNG through third party CNG stations should be allowed through alternative arrangements.

c) Any entity willing to connect customers/CNG stations through CGD network may install the required infrastructure subject to mutually agreed terms and conditions.

Submitted for kind consideration

Thanking you,

Yours Sincerely,

Nipun Nag
DGM (CGD)