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

Date: 30th October, 2018

Subject: Public Consultation Document (PCD) regarding Provisional Unit Natural Gas Pipeline Tariff of GAIL' Jagdishpur-Haldia-Bokaro-Dhamra Pipeline (JHBDPL).

Dear Madam,

This is in reference to your letter No PNGRB/M(C)/209 regarding stakeholders comment on the above mentioned subject, EWPLL comments are as detailed below:

1. Phase-Wise Commissioning of PL: Phase wise commissioning of pipeline and its implication on the period of Economic Life and their extension, whether the same will be also be defined phase-wisen. Similarly, the impact of Phased wise commissioning on the capacity determination and volume build up needs deliberation and clarity in the regulations.

2. It is also submitted that considering the nature of business, un-accounted-for gas (UFG) is a practical reality and need to be allowed to be factored as a part of opex, with certain normative cap.

3. Other points we would like to deliberate in the open house for the subject tariff.

Thanking you,

Yours faithfully,
For EWPLL Ltd.

E V S Rao
Sr. Vice President