

UEPL/PNGRB/Public comment/2017/002

Date: November 03, 2017

To,  
Ms. Secretary  
Petroleum and Natural Gas Regulatory Board  
1<sup>st</sup> Floor, World Trade Centre, Babar Road,  
New Delhi - 110 001  
India.

Kind Attention-Ms. Vandana Sharma

Dear Madam,

Subject: Comments by Unison Enviro Private Limited on Comments on PCD for GAIL's Mumbai Region Natural Gas Pipeline Network dated 25.10.2017

Reference-

1. MGL/Comm/2017/8413 dated Oct 6, 2017
2. PNGRB/M(C)/108-Vol-II dated 21.09.2017-DUPL-DPPL pipeline network
3. PNGRB/M(C)/7-Vol-II dated 03.10.2017-Mumbai Regional Pipeline Network

Dear Madam,  
UEPL paid Rs. 4.02 crore to Gail India for Gas connectivity on February 21, 2017. UEPL has no choice but to pay for timely execution of the project. We are working with Gail to get connectivity and expecting that Gail will provide connectivity by or before February 20, 2017 as per contractual obligatory maximum period is of 12 months.

This is huge amount for any start up CGD. UEPL supports view of MGL on connectivity charges and reproduced its comments with few additions.

  
Yours Truly,

Vinod Papal  
Head CGD Ratnagiri

Enclosed:a/a

Annexure I

Sr. no	Comments by UEPL
1	<p>Since LMC costs for providing tap offs to customers are incorporated in tariff calculations, there should not be any separate hook up charge(s) by the transporter as per presently prevailing norms.</p> <p>Therefore it is recommended to PNGRB should advise transporter-</p> <ol style="list-style-type: none"> <li>1. Not to charge upfront hook up charges from the customer unless transporter is creating infrastructure dedicated for the customer after it receives request for it. Prior infrastructure costs shall not be recovered from the new customer.</li> <li>2. In case if you are creating infrastructure dedicated for the customer, its shall be on actual cost basis and not lump sum charges.</li> </ol> <p>The high cost of connectivity is barrier for prospective CGDs. If any transporter has initiated the practice, it cannot be justification for other transporter that they are charging less than other transporter. It shall stand test of Natural law.</p>

