

PNGRB/.....6591.....  
Dt.....11/12/18

निगमित कार्यालय :  
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गैस लिमिटेड

सरकार का उपक्रम (एक महारत्न कंपनी -  
(इंडिया) लिमिटेड की पूर्णतः स्वामित्व अनुषंगी कम्पनी)

**GAIL Gas Limited**

(A Govt. of India Undertaking) (A wholly owned subsidiary of  
GAIL (India) Limited - A Maharatna Company)

No: GAILGas/Noida/HVJ-Int. PL Tariff/2018/1

Date: 07.12.2018

The Secretary  
Petroleum and Natural Gas Regulatory Board  
1<sup>st</sup> Floor, World Trade Centre,  
Babar Road, New Delhi-110001

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11/12  
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**Subject: Comments on PCD for Tariff Structure for HVJ-GREP-DVPL (HVJ) & DVPL/GREP Upgradation**

Respected Madam,

This has reference to the PNGRB's Public Consultation Document (PCD) No. PNGRB/M(C)/65-Vol.II dated 29.11.2018 on the subject mentioned above seeking views from stakeholders on determination of tariff whether to consider to the HVJ & HVJ Upgradation as integrated pipeline or separately as determined earlier.

It has been noted from the said PCD that as against the present provisional tariff for HVJ-GREP-DVPL (Rs.25.46/MMBTU) & DVPL/GREP Upgradation (Rs.53.65/MMBTU), the final levelized tariffs submitted by GAIL stands at Rs. 175.20/MMBTU and Rs.88.09/MMBTU respectively. The final HVJ-GREP-DVPL tariff is projected to be more than twice the estimated final DVPL/GREP Upgradation tariff as per submissions of GAIL (India) Limited. It is submitted that such tariff would be highly inequitable for the users of the HVJ-GREP-DVPL system vis-à-vis users of DVPL/GREP Upgradation system. Further, it is noted that

GAIL has submitted final levelized tariff of Rs. 97.04/MMBTU for HVJ Integrated System, which is being considered by PNGRB.

We, GAIL Gas Limited, are serving vast number of PNG (Domestic) and CNG (Transport) consumers are primarily paying the HVJ-GREP-DVPL tariff and hence, in case the HVJ-GREP-DVPL tariff increases as mentioned above, then it would have adverse implications for such a vast pool of small consumers.

In this regard, it is seen from the PCD that in case of integrated HVJ tariff, the projected standalone final HVJ-GREP-DVPL tariff of Rs.175.20/MMBTU may substantially come down to a level of Rs.97.04/MMBTU. On the other hand, for the users of the DVPL/GREP Upgradation, the projected standalone tariff of Rs.88.09/MMBTU would undergo only marginal upward revision.

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