



S.No 7651

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N. Bose Babu
Chief Executive Officer (CEO)

GITL/ COMM/2019/08
March 08, 2019

The Secretary,
Petroleum & Natural Gas Regulatory Board,
1st Floor, World Trade Centre,
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New Delhi - 110001

Handwritten notes and signatures:
AA(AK) 1-3523
11/03/2019
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AA(AK)
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DRCM(TA)

Subject: GITL views on proposal of IMC Ltd on extension of Kakinada-Vijayawada-Nellore Natural Gas Pipeline to ONGC's Odalarevu Terminal in Terms of Regulation 21(2).

Respected Madam,

This is with reference to Public Consultation Document dated 8.2.2019, vide which PNGRB has solicited views on proposal of IMC Limited for Extension of Kakinada-Vijayawada-Nellore Natural Gas Pipeline from GSPC/ONGC Terminal to ONGC's Odalarevu Terminal in terms of Regulation 21(2) of Petroleum and Natural Gas Regulatory Board (Authorizing Entities to Lay, Build, Operate or Expand Natural Gas Pipeline) Regulation 2008.

In above regard please find GITL's view on the subject matter attached at **Annex-A**.

With best regards,

Yours Sincerely,

(N. Bose Babu)

Annex-A**Views on proposal of IMC Ltd on extension of Kakinada-Vijayawada-Nellore Natural Gas Pipeline to ONGC's Odalarevu Terminal**

This is with reference to PNGRB's Public Consultation Document date 8.2.2019, vide which PNGRB has solicited views on "Proposal for extension of Kakinada-Vijayawada-Nellore Natural Gas Pipeline from GSPC/ONGC Terminal to ONGC's Odalarevu Terminal under Regulation 21(2). In this regard, you may please note views of GITL as follows:

1. IMC Ltd. request for extension of Kakinada-Vijayawada-Nellore Natural Gas Pipeline from GSPC/ONGC Terminal to ONGC's Odalarevu Terminal under Regulation 21(2) of the PNGRB Authorization Regulation, 2008 is flawed as this regulation is for extending pipeline to connect demand centers and not to connect source.
2. Further Regulation 21(2) of the PNGRB authorization regulation is for connecting demand centers which lie outside tariff zone, however in case of IMC ltd. the connectivity that IMC is seeking is at a distance of 49 km that lies within the tariff corridor.
3. It may be noted that the relevant provision to establish upstream connectivity i.e to connect gas source or injection point is Regulation 21(1) of the PNGRB Authorization Regulation, 2008 which further provides the precondition that the same is to be done through existing natural gas pipeline infrastructure.
4. In consideration of point 3 above, it is not permissible for IMC to file its request to connect ONGC Odalarevu terminal even under Regulation 21(1) of the PNGRB authorization regulation, since KVNPL is not an existing pipeline as IMC, as per its proposal, is in the process of conducting detailed route survey.

In view of above, it is requested that M/s IMC Proposal for extension of Kakinada-Vijayawada-Nellore Natural Gas Pipeline from GSPC/ONGC Terminal to ONGC's Odalarevu Terminal under Regulation 21(2) may be rejected.

n. Bm Babu