

S.No.6450

GMR/GEL/2018/DEL/042  
 Date: 30<sup>th</sup> November 2018

The Secretary,  
 Petroleum and Natural Gas Regulatory Board (PNGRB),  
 1st Floor, World Trade Centre,  
 Babar Road,  
 New Delhi – 110 001

Dear Madam,

**Subject:** Comments on PNGRB webhosted draft regulations on PNGRB (Levy of Fee and Other Charges)

**Reference:** Public Notice dated 01<sup>st</sup> November 2018

This has reference to the Public Notice and webhosted draft amendments on the PNGRB (Levy of Fee and Other Charges) Regulations, 2018, we would like to highlight the following important GoI initiatives:

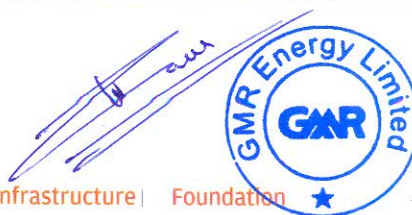
- GoI is focusing on Ease of Doing Business and has vision to break into the Top 50 rankings in the years to come.
- GoI have a vision of gas based economy and increase the share of gas in energy mix from 6% to 15%, while the world average is 24%.

In order to achieve the above GoI initiatives, PNGRB as a Regulator should acknowledge and bring out regulations which will benefit the creation of Infrastructure and meet the energy requirement of public at large.

Please find below our point wise comments on the proposed amendment for your kind consideration:

Regulation No	Comments
3 (1)	<ul style="list-style-type: none"> <li>• Revision in levy of fees by PNGRB is not acceptable, which may retard the GoI initiatives.</li> <li>• In spite of increasing the Levy of Fees, PNGRB should try to increase the infrastructure of Pipeline, CGDs, terminals, etc. by which they will be self-sustained to meet the required fees to run the Board.</li> <li>• From the proposed increase in the levy of fees, PNGRB may run into a revenue center and focus of the regulatory objectives of board may be lost.</li> <li>• PNGRB should realize that the fees levied will ultimately burden the end consumers.</li> </ul>

V  
3/12  
L-1968/JA(RKS)  
03/12/18  
JA(RKS)  
3/12  
SADOMU  
LEAD  
3/12  
ALCNS



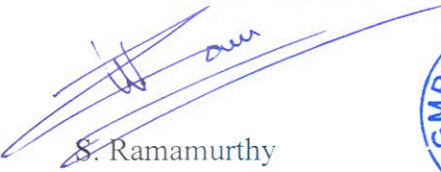
Regd. Office:  
 701, 7th Floor, Naman Centre  
 Plot No. C-31, Bandra Kurla Complex  
 (Opp. Dena Bank), Bandra East  
 Mumbai 400 051, Maharashtra

	<ul style="list-style-type: none"><li>• Therefore, in the interest of public of large, PNGRB should focus on increasing the infrastructure and find out possible way to reduce the levy of fees.</li></ul>
4 (2)	<ul style="list-style-type: none"><li>• Revision of Levy of other charges by PNGRB is not acceptable.</li><li>• The objective of the PNGRB is to ensure creation of pipeline and CGD infrastructure projects in order to meet the end consumer's requirement.</li><li>• PNGRB should encourage project developers and should not burden them by levying fees during the project execution/ construction period.</li><li>• This levy of other charges will not only impact the project developer but also will ultimately burden the end consumers which is not the intention of PNGRB.</li><li>• PNGRB may levy other charges after commencement of operations of the entities @ 0.02% of the net profits (excluding taxes) for the relevant financial year which will not burden the end consumers.</li></ul>
Form 1	<ul style="list-style-type: none"><li>• PNGRB to incorporate the above comments and suitably modify the Form 1.</li></ul>

We request PNGRB to consider our point wise comments as proposed and suitably amend the draft Regulations for "Levy of Fee and Other Charges".

Yours sincerely,

**For GMR Energy Limited**

  
S. Ramamurthy  
Head- Hydrocarbons

