

Subject: **Comments on Public Consultation Document (PCD) on Final initial unit natural gas pipeline tariff of HVJ-GREP-DVPL natural gas pipeline and DVPL-GREP-Up gradation natural gas pipeline**

Date: 29/11/18 06:20 PM

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To: "Smt. Vandana Sharma" <secretary@pngrb.gov.in>

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GSPL PNGRB Letter dated 29122018.PDF (456kB)

Respected Madam,

Please find enclosed herewith GSPL letter dated 29.11.2018 on the subject matter.

Submitted for your kind perusal please.

Regards

Vivek Singh

GSPL

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GSPL/COMM/2018
29th November, 2018

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Executive Director (Gas Business)

Ms. Vandana Sharma
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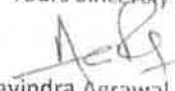
Sub: Additional submission on Public Consultation Document (PCD) on Final initial unit natural gas pipeline tariff of HVJ-GREP-DVPL natural gas pipeline and DVPL-GREP-Up gradation natural gas pipeline.

Respected Madam,

With reference to PNGRB Public Notice Ref.: No. PNGRB/ M(C)/65-Vol-II dated 18.10.2018 and Open House discussion had in the office of PNGRB on 26.11.2018, please find attached herewith GSPL's additional submission at **Annexure-I** for your kind perusal.

Thanking You,

Yours Sincerely


Ravindra Agrawal
Group ED (Gas Business)

Additional submission on Final Initial Unit Natural Gas Pipeline Tariff for HVJ-GREP-DVPL and DVPL / GREP Up-gradation

A. Additional Compressor Trains installed at Jhabua and Vijaipur

i. GAIL submission

- a. Capacity increase due to installation of Additional Compressor Trains at Jhabua and Vijaipur has been considered in DVPL-GREPL-Up gradation natural gas pipeline

GSPL Additional Submission

- a. As per GAIL's Tender document for installation of Additional Compressor Trains at Jhabua and Vijaipur (attached herewith) is for boosting natural gas pressure in 42" Dahej-Viajipur Gas pipeline which is a part of HVJ-DVPL-GREP natural Gas Pipeline.
- b. PNGRB has also authorised in its letter of acceptance dated 14.02.2011 for installation of aforesaid additional compressors to GAIL in HVJ-DVPL-GREP natural Gas Pipeline.
- c. Hence, capacity increase in HVJ-DVPL-GREPL natural gas pipeline for the period post FY 2011-12 due to installation of aforesaid additional compressor trains is yet to be determined / considered.
- d. It is submitted that GSPL has no objection if PNGRB considers Capex and Opex for installation of aforesaid additional compressor trains in GAIL's Tariff determination of HVJ-DVPL-GREP natural gas pipeline pending consideration of its impact in pipeline capacity.
- e. However, in the similar line, PNGRB should also consider GSPL's Gana Compressor Station in Tariff Determination of GSPL's High Pressure Gujarat Gas Grid.

B. Access to HVJ-DVPL-GREP Up gradation natural gas pipeline

GAIL submission

- a. Contractual booking / Access to HVJ-DVPL-GREP Up gradation natural gas pipeline has not been provided to consumer / shipper citing PNGRB direction at Clause 4.18 of PNGRB provisional tariff order dated 19th April, 2010.

GSPL Additional Submission

- a. We understand that PNGRB direction at Clause 4.18 of PNGRB provisional tariff order dated 19th April, 2010 was due to HVJ-DVPL-GREP Up gradation operating at 100% capacity.
- b. Accordingly, PNGRB has in aforesaid tariff order has mentioned for booking new and incremental capacity in DVPL-GREPL Up gradation pipeline.
- c. However, presently as per GAIL submission and mentioned in PNGRB Public Consultation document dated 18.10.2018, natural gas flow in HVJ-DVPL-GREP up gradation is below 75% of pipeline capacity.

Extract of tender document

Job specification for gas turbine driven centrifugal compressors

1.0 Scope

This specification describe the minimum requirements for design , engineering , manufacture , testing, supply & supervision of erection and commissioning of the Compressor package for GAIL's Compressor station at Jhabua and Vijaipur as described hereunder and in various attachments listed in the Material Requisition. The intent of these requirements is to supplement, highlight and modify the requirements as given in data sheets, specifications as listed under list of attachment & enclosed with the Material Requisition and other applicable standards referred to in datasheets / specifications.

2.0 General

2.1 Purpose

(i)The subject Gas Turbine –Compressor trains (GTC's) at Jhabua are required for boosting 35 MMSCMD R-LNG and NG coming from Dahej through 42 " dia pipeline for its onward transportation in 42" DVPL. The configuration shall be 2 working + 1 standby GTC's trains. Each GTC will be designed to cater to a capacity of 17.5 MMSCMD of gas. (or suitable configuration as may be suggested by vendor)

The tentative parameters shall be as follows:

- Suction pressure : 61.81 Kg/Cm2 g
- Discharge pressure : 92 Kg/Cm2 g
- Suction temperature : 30 Deg C

(ii)The subject Gas Turbine –Compressor trains (GTC's) at Vijaipur are required for boosting 20 MMSCMD R-LNG and NG coming from Dahej through 42 " dia pipeline for its onward transportation in 48" Vijaipur –Dadri Pipeline. The configuration shall be 1 working + 1 standby GTC's trains. Each GTC will be designed to cater to a capacity of 20 MMSCMD of gas. (or suitable configuration as may be suggested by vendor).

The tentative parameters shall be as follows:

- Suction pressure : 54.64 Kg/Cm2 g
- Discharge pressure : 97 Kg/Cm2 g
- Suction temperature : 30 Deg C

3.0 Operating Philosophy

3.1 The operating and control philosophy of the subject compressors shall be as follows.

3.1.1 Monitoring and control of the compressor station shall be performed at three levels, viz Master control centre (SCADA) & Compressor Control panel / common facility panel / PLC Console.

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- d. In view of sufficient capacity availability in HVJ-DVPL-GREP Up gradation as mentioned / submitted by GAIL, PNGRB is requested to seek clarification from GAIL as to why capacity was denied in HVJ-DVPL-GREP and capacity was made available only in DVPL-GREP-Up gradation pipeline.

C. Extension of Economic life of HVJ-DVPL-GREP Up gradation natural gas pipeline

GAIL submission

- a. GAIL sought two week time for submission of its comment

GSPL Additional Submission

- a. GAIL itself in its submission to PNGRB dated 12.10.2018 to determine tariff on integrated basis, as mentioned in the PCD have extended the economic life of HVJ-DVPL-GREP Up Gradation from 14th August, 2022 to 26th March, 2035 i.e. extended for approx. 13 years.
- b. Also, as mentioned in PCD, GAIL has submitted Future Capex & Future Opex required for operation of HVJ-DVPL-GREP Up Gradation for additional 13 years beyond August, 2022 i.e. up to March, 2035.
- c. In view of above submission of GAIL, it can be ascertain that economic life of HVJ-DVPL-GREP up gradation can be extended for 10 years as per PNGRB Regulations.
- d. The above shall support / benefit consumer for transportation of natural gas.
