



Hazira LNG Private Ltd.

Ref: SEI/MC/2019/PNGRB/PCD/03
02 May 2019

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

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Subject: Comments on the proposed amendments in the Petroleum and Natural Gas Regulatory Board (Determination of Natural gas Pipeline Tariff) Regulations, 2008

Respected Madam,

This has reference to the public notice soliciting views on the draft amendments in the Petroleum and Natural Gas Regulatory Board (Determination of Natural gas Pipeline Tariff) Regulations, 2008. Please find below our views on the proposed amendments.

1) Clause (h) of sub-regulation (1) of regulation 2:

- a. We request the honourable Board to suitably modify the proposed amendment to align with sub-clause (9.11) of clause 9 of Schedule A, which permits the pipeline owners to seek review of the unit natural gas pipeline tariff any time between two tariff reviews to account for a sudden change in any parameter used in the determination of the unit natural gas pipeline tariff. The Board may define an objective criterion such as specific threshold limits on the key parameters for permitting the pipeline entities to seek an interim review of the tariff.
- b. We request the honourable Board to issue guidelines on the assumptions to be considered for estimation of various parameters and allocation of corporate overheads/common costs which are required for determination of tariff. This will contribute to completion of the tariff reviews expeditiously. The honourable Board may also consider fixed timelines for submission of the requisite data in the stipulated format by the entities and completion of the review process.

2) sub-clause (4) of clause 9 of Schedule A:

- a. We support the proposed amendment which provides for application of the revised tariff from the customers on prospective basis. This will eliminate the uncertainty and the need for provisioning for any differential tariff by both the pipeline owners and gas users.

We will be happy to provide any further information if required.

Your Sincerely,
For Hazira LNG Private Limited


Ashwani Dudeja
Chief Commercial Officer



Hazira LNG Private Ltd. is a subsidiary of Shell Gas B.V.
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