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PNGRB/.....
दिनांक 210519
Dt.....

20/2019/010 set

Date: 2nd May, 2019

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

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Subject: Public Notice regarding seeking comments on proposed amendment in Tariff Regulations.

Dear Madam,

Please refer to PNGRB's Public Notice dated 16th April, 2019, seeking comments/ views from the stakeholders on the proposed amendment in Petroleum and Natural Gas Regulatory Board (Determination of Natural Gas Pipeline Tariff) Regulations, 2008.

We appreciate the intent of PNGRB to address the issues related to retrospective applicability of tariff by proposing these amendments, however, it is requested that PNGRB may also address the concerns as mentioned below before implementing the proposed amendments.

RIL being one of the major consumer of natural gas and user of natural gas pipeline would like to submit as follows:

1. PNGRB has recently declared tariff order for two natural gas trunk pipelines i.e. GSPL HP network and GAIL's DUPL. However, both the tariff orders are contested by few shippers in courts on different accounts including retrospective charging of tariff and the matter is sub-judice. Some of the consumers have also got the stay order against these tariff orders and some have paid the tariff with retrospective effect as per the recent tariff orders.
2. This has resulted in discrimination among the shippers on account payment of tariffs under these tariff orders.
3. In view of the proposed amendment with regard to prospective applicability of tariff, given the fact that recent tariff orders with retrospective effect are already sub-judice, it is not clear whether the proposed amendment will apply to those tariff orders. In our view, these tariff orders which have retrospective effect should also be reviewed and brought under the ambit of the proposed regulation to ensure uniformity amongst shippers on these pipelines.

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Reliance
Industries Limited


4. In addition to above, the amount already paid by some of the shippers with retrospective effect under the tariff orders which are sub-judice should also be addressed.
5. The above shall ensure that all shippers are treated at par without any discrimination.

We would like to submit our viewpoints in detail in the open house.

Thanking you

Yours faithfully,

For Reliance Industries Limited



Authorized Signatory

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