

**PETROLEUM AND NATURAL GAS REGULATORY BOARD (CONSUMER
PROTECTION) REGULATIONS, 2025**

NOTIFICATION

New Delhi, the _____, 2025

F. No. PNGRB/Consumer/_____/ (E-_____)

In exercise of the powers conferred by Section 61 of the Petroleum and Natural Gas Regulatory Board Act, 2006 (19 of 2006), the Petroleum and Natural Gas Regulatory Board hereby makes the following regulations, namely: -

IOCL Retail Input on the proposed PNGRB draft:

PNGRB had formed a committee comprising of senior officers from industry to frame guidelines for Consumer Protection Regulations for consumers of CNG, PNG, and LNG since no such regulations were framed earlier. Accordingly, officers ONLY from CGD companies including IOCL and BPCL were nominated by PNGRB. While presenting the draft regulations to PNGRB, they were instructed to add regulations for MS/HSD and LPG customers also, in spite of various Gazettes and Regulations already in vogue. It is pertinent to mention that PNGRB sought to formulate the guidelines with the GAS BU officers without seeking comments from officers of Retail and LPG business units.

View above, our comments are as under:

In respect of Retail outlets dispensing petrol and diesel, it is submitted that a comprehensive regulatory framework is already in place governing all critical operational and consumer protection aspects. Retail outlet operating hours and availability obligations are expressly covered under the Universal Service Obligation (USO), in addition to the Marketing Discipline Guidelines (MDG) and Dealership Agreement. Fuel quality, quantity, pricing, safety, customer amenities, grievance redressal, penalties, housekeeping including clean toilet availability, and compensation are comprehensively regulated under the MDG, Motor Spirit and High-Speed Diesel (Regulation of Supply, Distribution and Prevention of Malpractices) Order, Legal Metrology Act and Rules, PESO/OISD standards, Minimum Service Obligations and the Consumer Protection Act, 2019.

It is important to note that RO dealers are selected as per the approved Dealership Selection Guidelines, which comply with the social obligations of society by selecting persons from the SC/ST community, PH category candidates, retired/martyred Defence personnel, war widows, non-creamy layer candidates from OBC, etc. This is in stark contrast to a CNG dealership, which is offered based on bidding and thus, selection is more on a commercial basis.

The candidates selected for RO dealership often have no business background, and SC/ST dealers are supported by IOC through working capital assistance. Also, the land for Retail outlets of SC/ST categories are arranged (on lease or purchase) by the IOC and further all infrastructure at the Retail outlet are developed by the IOC.

IOC is also obligated to set up ROs in remote areas compulsorily, where volumes are not significant for business sustenance. Further, there are additional obligations such as customer surveys, customer awareness programs and penalties for customer service deficiencies defeats the very purpose of the government's initiative to uplift this segment of society and would be against the spirit of the Constitution. For outlets in remote areas as well, all the proposed obligations become an undue burden.

Apart from consumer complaint redressal platforms like CPGRAMs, MoPNG e-SEVA, which is majorly monitored by the MoPNG. Additionally, IOC has very robust customer complaint redressal mechanisms in place – social media-based, toll-free numbers, RO complaint book, customer complaint redressal through personal visits to DOs etc.

Through Retail Outlet Automation, product stocks, Quality/Quantity (Q&Q) are monitored in real-time by the IOC. Also, through the random inspections conducted by the IOC officers; RO operations, safety, services, and Q&Q are monitored regularly.

It is pertinent to note that under the contractual agreement between IOC and dealers, the responsibility for storing and delivering products (liquid fuels) of correct quality and quantity rests with the dealer. Dealers are obligated to maintain high service standards as per the MDG. Currently, dealers are required to address any deficiencies in consumer services.

The MDG, which helps the IOC to maintain discipline in the operation of the Retail network and ensure high customer service standards, contains detailed penal provisions for the defaulting dealers. A review of the Draft PNGRB (Consumer Protection) Regulations, 2025 indicates that the provisions proposed for retail outlets substantially replicate existing obligations / provisions already mandated under the above frameworks, including those arising from Universal Service Obligation requirements.

These additional regulations proposed by PNGRB are not new and already exist in one form or the other, offering no value addition to customers, dealers, or IOC. Introduction of an additional PNGRB-specific compliance, grievance redressal, and compensation framework for retail outlets would therefore result in regulatory overlap, duplication of compliance requirements, and jurisdictional ambiguity, without providing any value addition or incremental consumer benefit. Moreover, this defeats the very purpose of the Government of India's Ease of Doing Business initiative by merely adding another layer of compliance.

It is accordingly submitted that MS/ HSD ROs be excluded from the scope of the Draft PNGRB (Consumer Protection) Regulations, 2025, as the objectives of consumer protection and service availability are already adequately addressed through existing statutory guidelines, Gazette notifications, policy, and contractual instruments including Universal Service Obligation provisions and against the Government Initiative of EASE OF DOING BUSINESS.

CHAPTER I: PRELIMINARY

1. Short title and commencement

- (a) These regulations may be called the Petroleum and Natural Gas Regulatory Board (Consumer Protection) Regulations, 2025.
- (b) These shall come into force on the date of their publication in the Official Gazette.

2. Definitions

- (a) In these Regulations, unless the context otherwise require:
 - (i) "Act" means the Petroleum and Natural Gas Regulatory Board Act, 2006 (19 of 2006);
 - (ii) "Appellate Authority" means the senior officer designated by an entity to handle complaints escalated from the Nodal Officer level;
 - (iii) "Authorized Representative" means a person, duly appointed and authorized in writing to represent the complainant in the proceedings before the Board, Ombudsman, or entity;
 - (iv) "Board" means the Petroleum and Natural Gas Regulatory Board established under Section 3 of the Act;
 - (v) "CNG" means Compressed Natural Gas;
 - (vi) "Commercial consumer" means small to medium-sized businesses and institutional users such as restaurants, cafes, hotels, catering units, laundromats, hospitals, schools, and offices that use petroleum products, petroleum or natural gas for commercial purposes;
 - (vii) "Complainant" means and includes
 - a. any consumer or consumers including their legal heirs or successors, having complaint against the entity for violation of provisions of Act and regulations framed thereunder and lodging the same either directly or through authorized representatives; or
 - b. any voluntary consumer association or non-governmental organization, registered or unregistered and making complaints for violation of provisions of Act and regulations framed thereunder in the larger common or similar interest of the consumers; or

IOCL LPG Inputs on definition of 'Complainant' :

In view of numerous channels already available with the end customer to raise and receive resolution of complaints, separate complaints being received through other sources such as voluntary consumer association or non-governmental organization, registered or unregistered is not warranted.

IOCL along with its channel partners have a constant interaction with the customers or their representatives directly. Adding parallel channel instead of consumer may lead to duplication of complaints / efforts of the entity and may invite malpractices.

- c. Central or State Government or any authority where Board refers a complaint or dispute pertaining to violation of provisions of Act and regulations framed thereunder;
 - (viii) "Complaint" means a representation in writing including electronic modes by the Complainant alleging violation of provisions of Act and regulations framed thereunder

on part of an entity, deficiency in service, or non-compliance with quality standards, and seeking relief under these regulations;

Provided that requests for information and routine service requests such as change of mobile number, address change, or general queries shall not be treated as complaints;

IOCL LPG Inputs on exclusions:

Expand the definition of complaints to exclude several other queries/reference such as related to Court/Appellate proceedings/RTI related/Related to specific Corporation employee service etc/any confidential or Policy related or any reference which may result in loss to the corporation (Commercial or Otherwise) , and also any reference which does not generally concern any customers interest/rights pertaining to LPG

Any reference received through anonymous sources or with vague or non-specific information must not be considered.

- (ix) “Consumer” means any person who purchases and uses petroleum, petroleum products or natural gas for any purpose and includes:
- PNG domestic consumer;
 - PNG commercial consumer;
 - PNG industrial consumer;
 - CNG consumer;
 - LPG consumer;
 - Petrol consumer at retail outlets;
 - Diesel consumer at retail outlets;
 - Any other category of consumer as may be specified by the Board;
- (x) “Consumer Awareness Programme” means any programme, campaign, workshop, seminar or activity undertaken to educate and inform consumers about their rights, obligations and best practices in consumption of petroleum, petroleum products and natural gas;
- (xi) “Consumer Complaint Cell” means the consumer complaint cell constituted by an entity under Regulation 16 of these regulations;

IOCL CGD Inputs

To be modified as “Consumer Complaint Cell” means the consumer complaint cell or Customer care office constituted by an entity under Regulation 16 of these regulations;

Justification

Definition of Consumer complaint cell to be revised to include customer care.

- (xii) “Consumer Protection Fund” means the fund established under Regulation 28 of these regulations;
- (xiii) “Consumer Satisfaction Survey” means a survey conducted to assess the satisfaction level of consumers regarding the services provided by entities as per the framework specified under these regulations;
- (xiv) “CPGRAMS” means the Centralized Public Grievance Redress and Monitoring System, an online platform for lodging grievances;
- (xv) “CRM” means Customer Relationship Management system maintained by entities for complaint management;

- (xvi) “Emergency Complaint” means a complaint relating to gas leakage, no gas, fire, explosion, or any other situation posing immediate threat to life, property or public safety;

IOCL LPG Inputs on point (xvi):
“No gas” is not an emergency complaint in context of LPG

- (xvii) “Entity” means any person engaged in the activities of refining, processing, storage, transportation, distribution, marketing or sale of petroleum, petroleum products or natural gas and includes:
- Authorized entity for City Gas Distribution network;
 - Oil Marketing Company (OMC);
 - LPG distributor;
 - Retail outlet dealer for petrol and diesel;
 - Natural gas pipeline operator;
 - Any other entity as specified by the Board;
- (xviii) “HSD” means High Spirit Diesel (HSD) or “Diesel” have been used interchangeably in these regulations and shall be construed to have the same meaning as assigned to High Speed Diesel under the relevant provisions of the Petroleum Act, 1934
- (xix) IGMS” Integrated Grievance Management System (IGMS) means an online escalation and facilitation platform developed by the Board to empower consumers in seeking redressal for their unresolved grievances after exhausting entity’s internal grievance mechanism;
- (xx) “Industrial consumer” means manufacturing plants, chemical industries, power generation units, textiles, ceramics, fertilizers, automobile parts manufacturers and any other industrial establishment engaged in any manufacture of products consuming petroleum, petroleum products or natural gas for industrial purposes;

IOCL LPG Inputs on “Industrial consumer”: Commercial LPG is a competitive business and should not be covered under this regulation

- (xxi) “INGRAM” means Integrated Grievance Redressal Mechanism platform managed by the Department of Consumer Affairs;
- (xxii) “LPG” means Liquefied Petroleum Gas;
- (xxiii) “MS” means Motor Spirit (MS) or “Petrol” have been used interchangeably in these regulations and shall be construed to have the same meaning as assigned to Motor Spirit under the relevant provisions of the Petroleum Act, 1934
- (xxiv) “NGO” means a Non-Governmental Organization registered under the Societies Registration Act, 1860 or the Indian Trusts Act, 1882 or Section 8 of the Companies Act, 2013 and empanelled by the Board under these regulations;
- (xxv) “Nodal Officer” means a senior officer not below the rank of General Manager or equivalent designated by an entity to oversee complaint redressal mechanism;
- (xxvi) “Ombudsman” means an authority established under Notified Regulations to ensure fair redressal of consumer grievances and to recommend or direct appropriate actions in accordance with applicable obligations;
- (xxvii) “PNG” means Piped Natural Gas;
- (xxviii) “Principal Nodal Officer” means the officer designated by an entity not below the rank

of General Manager or equivalent responsible for overall functioning of the consumer complaint cell and represent the entity before Ombudsman

IOCL LPG Inputs:

Designations mentioned in points no (xxv) & (xxviii) does not cover LPG Distributors.

IOCL Retail Inputs:

Designations mentioned in points no (xxv) & (xxviii) does not cover RO Dealers.

- (xxix) "PLR" means the Prime Lending Rate the rate at which leading commercial banks lend money to their most credit-worthy customers;
- (xxx) "Quality of Service Standards" means the standards specified in Schedule A or as may be notified by the Board from time to time;
- (xxxi) "Retail Outlet" means any retail outlet dispensing petrol, diesel, CNG or any other petroleum product to consumers
- (xxxii) "Settlement" means an agreement reached by the parties to the complaint by facilitation or mediation, as per the provisions of these Regulations;
- (xxxiii) "Settlement Agreement" means a settlement agreement passed by the Ombudsman in accordance with detailed Ombudsman regulations;
- (xxxiv) "TAT" or "Turnaround Time" means the maximum time period specified for resolution of a complaint;
- (xxxv) "VCO" means a Voluntary Consumer Organization registered under the Societies Registration Act, 1860 or the Indian Trusts Act, 1882 or Section 8 of the Companies Act, 2013 and empanelled by the Board under these regulations;
- (xxxvi) Words and expressions used but not defined in these Regulations shall have the same meanings as assigned to them in the Act or in any other regulations made thereunder

3. Application

- (a) These regulations shall apply to all entities engaged in the activities of refining, processing, storage, transportation, distribution, marketing or sale of petroleum, petroleum products or natural gas.
- (b) These regulations shall apply to all consumers of petroleum, petroleum products and natural gas.
- (c) Nothing in these regulations shall affect the rights of consumers under the Consumer Protection Act, 2019 or any other law for the time being in force.

CHAPTER II: RIGHTS OF CONSUMERS

4. Fundamental rights of consumers

Notwithstanding anything contained in any other Regulations, every consumer shall have the following fundamental rights:

- (a) **Right to Safety:** To be protected against hazardous petroleum, petroleum products and natural gas and services thereof;
- (b) **Right to Information:** To be informed about the quality, quantity, potency, purity, standard, price and composition of petroleum, petroleum products and natural gas so as to protect the consumer against unfair trade practices;

IOCL LPG Inputs: LPG product is supplied in line with the relevant IS standards, Gas Control Order and Gas cylinder rules. Separate definitions are not required.

IOCL Retail Inputs: MS and HSD is supplied in line with the relevant IS standards. Separate definitions are not required.

- (c) **Right to Choose:** To have choice among the various suppliers and access to a variety of petroleum, petroleum products and natural gas at competitive prices;

IOCL LPG Inputs: The LPG customer has the choice to take/transfer connection with any OMC. They are serviced by the LPG Distributor with whom they are registered.

- (d) **Right to be Heard:** To be assured that consumer interests will receive due consideration at appropriate forums;
- (e) **Right to Redressal:** To seek redressal against unfair trade practices or restrictive trade practices or unscrupulous exploitation of consumers;
- (f) **Right to Quality and Assured Supply:** To be assured for continuous, safe, and quality supply of natural gas.
- (g) **Right to Fair Trade Practices:** To be protected from unfair trade practices, false advertising, overcharging, or misrepresentation.
- (h) **Right to Consumer Education:** To acquire knowledge and skills to be an informed consumer throughout life.

5. Specific rights of PNG consumers

In addition to the fundamental rights under Regulation 4, every PNG consumer shall have the right to:

- (a) New connection within the timeline specified in Schedule A;
- (b) To know the current status of their application, the expected time for activation, and the reasons for any delay or non-activation, through such modes of communication as may be specified by the entity;
- (c) Supply of natural gas of specified quality, pressure and calorific value as per technical standards and specifications;
- (d) Uninterrupted supply of natural gas except for planned maintenance or force majeure events;
- (e) Prior intimation of at least 48 hours for planned supply interruptions;
- (f) Registration of complaint through multiple channels including online, telephone, walk-in, mobile app, email, and government portals;

- (g) Resolution of complaints within the TAT specified in Schedule B according to complaint category;
- (h) Accurate metering and billing with bi-monthly bills provided at least 15 days before due date;
- (i) Refund of security deposit upon disconnection as per regulations;
- (j) Compensation for deficiency in service as per the compensation framework under Chapter VII;
- (k) Access to complaint history and status through online portals and mobile applications;
- (l) Escalation of unresolved complaints through defined escalation matrix.

6. Specific rights of CNG consumers

Every CNG consumer shall have the right to:

- (a) Dispensing of CNG of specified quality, quantity and pressure as per technical standards;
- (b) Calibrated and verified dispensing equipment with valid calibration certificate displayed;
- (c) Display of price per kilogram at all CNG stations;
- (d) Safe dispensing facilities meeting technical standards and safety specifications;
- (e) Receipt for every transaction;
- (f) Complaint registration mechanism including QR code based instant complaint lodging facility at CNG stations;
- (g) Basic amenities including washrooms, drinking water, and air filling services at no cost at CNG stations.

7. Specific rights of LPG consumers

Every LPG consumer shall have the right to:

- (a) Timely delivery of refills within specified time frames;
- (b) LPG cylinder of specified quality and weight meeting safety standards;
- (c) Emergency response through dedicated helpline (1906) for leakage complaints;
- (d) Booking through multiple channels including online, telephone, and mobile app;
- (e) Accurate subsidy credit and transparent billing;
- (f) Complaint registration through toll-free number and other channels;
- (g) Safe delivery and installation by authorized personnel.

IOCL LPG Inputs point no (e):
Subsidy is transferred as per norms given by MOPNG from time to time .

8. Specific rights of petrol and diesel consumers at retail outlets

Every consumer at retail outlets shall have the right to:

- (a) Availability of petrol and diesel during specified working hours;

IOCL Retail Input: Covered under “The Motor Spirit & High Speed Diesel Order 2005”.

- (b) Dispensing of unadulterated fuel meeting quality standards as per BIS specifications;

IOCL Retail Input: Covered under “The Motor Spirit & High Speed Diesel Order 2005”.

- (c) Calibrated and verified dispensing equipment with valid certificate displayed;

IOCL Retail Input: Covered under “Legal Metrology Act”

- (d) Display of Maximum Retail Price (MRP) prominently at each dispensing unit;

IOCL Retail Input: Covered under “Legal Metrology Act”

- (e) Receipt for transactions;

IOCL Retail Input: Covered under “Legal Metrology Act”

- (f) Clean and hygienic facilities including washrooms, drinking water, and air services at no cost at retail outlets;

IOCL Retail Input: Covered under Citizen’s Charter and the Marketing Discipline Guideline (MDG)

Furthermore, it is pertinent to note that numerous retail outlets operating in Class A and Class B markets face significant space constraints and infrastructural challenges that make it impractical to provide toilet facilities on site. The draft regulation fails to adequately address these ground realities or provide appropriate exemptions for such establishments. Consequently, blanket implementation would be both unfeasible and unduly burdensome for a substantial segment of Retail Businesses, potentially comprising their operational viability.

- (g) Complaint registration mechanism displayed prominently including contact details of Field Officer;

IOCL Retail Input: Covered under Citizen’s Charter and the Marketing Discipline Guideline (MDG)

- (h) Right to report quality and quantity issues within 24 hours of purchase

IOCL Retail Input: Covered under Citizen’s Charter and Customer Protection Act 2019

IOCL Retail Input:

Since all the proposed consumer rights are already adequately protected under various existing provisions and legislative frameworks, the proposed regulations for retail outlets are not recommended.

9. Right to grievance redressal

- (a) Every consumer shall have the right to lodge a complaint with the Consumer Complaint Cell of the entity through multiple channels.
- (b) Every consumer shall have the right to escalate the complaint through the defined escalation matrix if not resolved within specified TAT.
- (c) Every consumer shall have the right to escalate the complaint to the Ombudsman if the

complaint remains unresolved even after approaching the Appellate Authority of the entity.

- (d) Every consumer shall have the right to approach consumer forums under the Consumer Protection Act, 2019 without prejudice to the rights under these regulations.

Every consumer shall have the right to reopen a complaint within 7 days of closure if unsatisfied with the resolution.

IOCL LPG Inputs on point no 9:

IOCL has well defined complaint redressal mechanism with escalation.
We have already expressed our reservation on creation of Ombudsman.
Legal recourse is already available to the customer.

IOCL Retail Inputs on point no 9:

IOCL has well defined complaint redressal mechanism with escalation. We have already expressed our reservation on creation of Ombudsman.
Legal recourse is already available to the customer.

IOCL CGD Inputs

Ombudsman to be removed

Justification

As the CGD consumers are covered under general consumer protection rules, an Ombudsman is not required for the sector. Complaint to the Ombudsman will add too much of compliance burden on the fledgling CGD industry.

CHAPTER III: OBLIGATIONS OF CONSUMERS

10. General obligations of consumers

Every consumer shall:

- (a) Provide accurate information while applying for new connection or services;
- (b) Use petroleum, petroleum products and natural gas in a safe manner in accordance with safety guidelines;
- (c) Pay bills and charges within the due date as specified by the entity;
- (d) Not indulge in theft, diversion or unauthorized use of petroleum, petroleum products or natural gas;
- (e) Not tamper with meters, pipelines, dispensing equipment or any other installation of the entity;
- (f) Allow authorized personnel of the entity for meter reading, inspection, maintenance and safety checks;
- (g) Intimate the entity in case of any leak, damage or abnormality in the supply;
- (h) Comply with applicable laws, rules and regulations;
- (i) Use petroleum, petroleum products and natural gas judiciously and promote conservation;
- (j) Report complaints within reasonable time (within 24 hours for quality and quantity issues at retail outlets);
- (k) Cooperate with entity personnel during complaint resolution process.

IOCL LPG Inputs:

Point no (j) to include LPG Distributorship also

11. Specific obligations of PNG consumers

Every PNG consumer shall:

- (a) Maintain the internal piping and installations in safe condition;
- (b) Not carry out any alteration or addition to gas installation without intimation to the entity;
- (c) Permit installation and maintenance of meter by the entity;
- (d) Not resell or redistribute natural gas supplied for domestic or commercial purposes;
- (e) Inform the entity immediately in case of change of ownership or occupancy;
- (f) Not tamper, modify or conceal gas piping infrastructure, meters, or appliances;
- (g) Not excavate on or near underground gas pipeline network without prior intimation to entity;
- (h) Not store flammable or combustible goods nearby gas installations;
- (i) Always use ISI marked stoves, burners and equipment;
- (j) Provide reasonable access to premises for PNG service providers for routine maintenance, safety checks, emergency repairs, and meter reading;

- (k) For industrial and commercial consumers, ensure TPA certification from PNGRB authorized TPA prior to commissioning and re-certification once in 3 years as per T4S regulations.

12. Specific obligations of CNG consumers

Every CNG consumer shall:

- (a) Ensure installation of PESO approved CNG cylinder with testing validity and CNG kit from authorized dealer/retrofitter;
- (b) Carry out hydro-testing of cylinder before due date through PESO authorized testing agency;
- (c) Ensure frequent inspection of CNG kit and cylinder for leakages through authorized OEM/retrofitter;
- (d) Not refill CNG in vehicle not having valid hydrotested CNG cylinder;
- (e) Not store flammable or explosive goods inside and nearby parked vehicles;
- (f) While inside a retail outlet or CNG station for refuelling:
 - (i) Not use mobile phone or RFID device;
 - (ii) Not smoke or light naked flame;
 - (iii) Alight passengers at the entry of the station;
 - (iv) Ensure no one is sitting inside vehicle during refuelling;
 - (v) Turn the vehicle ignition off while refuelling;
 - (vi) Apply handbrakes while refuelling;
 - (vii) Ensure ZERO reading on dispenser while refuelling.

13. Specific obligations of LPG consumers

Every LPG consumer shall:

- (a) Abide by the terms and conditions under which the LPG connection has been released;
- (b) Adopt safe practices while using LPG;
- (c) Not accept LPG cylinders from sources other than the registered LPG distributor;
- (d) Not exchange with others or loan to others the cylinders or Domestic Pressure Regulator (DPR);
- (e) Follow conservation tips while using LPG;
- (f) Surrender LPG connection within 60 days from date of obtaining PNG connection;
- (g) Keep mobile number and email updated with the entity for timely notifications.

IOCL LPG Inputs on point no 13:

1. To Include the following:
 - a. Safe usage of LPG by consumers
 - b. Consumers to carry out mandatory inspections as per laid down norms through their distributors
 - c. Consumer not to tamper with LPG equipment
 - d. Consumer to carry out e-kyc
 - e. Consumer to share delivery authentication code at the time of delivery
 - f. Consumer to provide feedback on the link sent
 - g. Kitchen to be properly ventilated and devoid of flammable material
 - h. Consumer to use LPG equipment supplied by Indane Distributors only
 - i. Consumer to use LPG at the registered premises only
 - j. All the equipment being used in the LPG installation other than the Cylinder and the Pressure regulator should conform to all the statutory regulations and applicable IS standards.
2. Point f. is not aligned with the LPG Gas Control Order.
3. Point g: Many customers do not have mobile numbers / e-mails and the same is also not mandatory while issuing a connection

14. Specific obligations of retail outlet consumers

Every retail outlet consumer shall:

- (a) Switch off the engine before taking delivery of fuel;
- (b) Not smoke within retail outlet premises;
- (c) Not light matches or use mobile phones within the dispensing area;
- (d) Verify payment details carefully before making transactions;
- (e) Report quality and quantity issues within 24 hours of purchase;
- (f) Use only verified payment portals and not share personal details with unknown sources.

a to f: IOCL Retail Inputs: Citizen's Charter is already available on IOC's website and at ROs, which covers the Safety protocols to be followed by customers at ROs.

Also covers the Quality / Quantity checking methods at ROs, customer redressal mechanism in case of any complaints.

Since the proposed regulations are already comprehensively covered under the existing Citizen's Charter framework, the introduction of a separate regulatory system for retail operations is not recommended.

CHAPTER IV: OBLIGATIONS OF ENTITIES

15. General obligations of entities Every entity shall:

- (a) Supply petroleum, petroleum products and natural gas of specified quality and quantity meeting applicable standards;
- (b) Acknowledge receipt of new PNG connection application, maintain a system for real-time status tracking, and communicate expected activation timelines or reasons for delay;
- (c) Maintain adequate stock;
- (d) Ensure uninterrupted supply except during force majeure or contractual interruptions;
- (e) Comply with all technical standards, safety specifications, and regulatory requirements;
- (f) Display prices, quality certifications, calibration certificates, and other relevant information prominently;
- (g) Establish and maintain Consumer Complaint Cell with adequate infrastructure, staff and resources;
- (h) Register and resolve consumer complaints within specified TAT as per Schedule B;
- (i) Conduct consumer satisfaction surveys periodically through empanelled third-party agencies;

IOCL CGD Inputs	Justification
All the relevant clauses related with conducting consumer satisfaction surveys to be removed	In view of the existence of a comprehensive, and regulatorily compliant consumer feedback and grievance redressal mechanism within CGD entities, conducting periodic consumer satisfaction surveys through empanelled third-party agencies does not offer value addition and may be dispensed with to avoid duplication of effort and unwarranted expenditure on the CGD industry. Third-party surveys duplicate information at additional cost.

- (j) Undertake consumer awareness and education programmes throughout the year;
- (k) Maintain transparency in operations and disclosure of information as specified in Chapter IX;
- (l) Pay compensation for deficiency in service as per Chapter VII;

IOCL CGD Inputs	Justification
All the relevant clauses related with pay compensation to be removed	Compensation in CGD is meant to address genuine inconvenience, not to penalize. Since most issues are brief and promptly addressed, NIL compensation is proposed for CGD entities because: 1. The aim is to ease inconvenience,

	not to punish the CGD entity. 2. Excessive payouts may impact safety investments and network expansion. 3. Higher compensation could raise consumer tariffs, affecting all users.
--	--

- (m) Submit reports and information to the Board as prescribed;
- (n) Facilitate visits and inspections by the Board or its authorized representatives;
- (o) Comply with all applicable laws, regulations and directions of the Board;
- (p) Display contact details of Consumer Complaint Cell, Nodal Officer, Appellate Authority and Ombudsman at all customer touchpoints and on website;
- (q) Maintain CRM system for complaint management with online access for consumers to track complaint status;
- (r) Provide multiple channels for complaint registration including toll-free helpline, online portal, mobile app, email, walk-in centres, and government portals.

IOCL LPG Inputs:

The Draft PNGRB (Consumer Protection) Regulations, 2025 largely replicate obligations that are already comprehensively mandated under existing frameworks such as LPG Control Order, the Legal Metrology Act, and Citizen's Charter requirements.

The customers are being served by LPG Distributors with whom IOCL has principal to principal agreement and the distributor is therefore liable for any service deficiency and as such will have to bear the compliance and compensation cost. It may lead to resistance to serve certain customers or areas

In view of the above, the proposed framework with the mentioned obligations are repetitive and not recommended.

16. Consumer Complaint Cell

- (a) Every entity shall establish a Consumer Complaint Cell at its head office and at regional offices as may be specified by the Board.

IOCL CGD Inputs To be modified as "Every entity shall establish a Consumer Complaint Cell / Customer care cell at its head office or at regional offices."	Justification Customer care is not required at the head office and regional office both.
---	---

- (b) The Consumer Complaint Cell shall consist of senior officers not below the rank of General Manager or equivalent.

IOCL CGD Inputs

To be modified as "The Consumer Complaint Cell / Customer care cell shall consist of senior officers not below the rank of Senior Manager or equivalent.

- (c) The entity shall appoint a Principal Nodal Officer, who shall not be of rank less than a General Manager or an officer of equivalent rank, and shall be responsible for:
 - (i) Overall functioning of the Consumer Complaint Cell;
 - (ii) Representing the entity before the Ombudsman;
 - (iii) Furnishing information to the Ombudsman and Board;
 - (iv) Monitoring complaint resolution performance;
 - (v) Submitting quarterly and annual reports to the Board.
- (d) The entity shall provide adequate infrastructure, staff and resources to the Consumer Complaint Cell.
- (e) The Consumer Complaint Cell shall receive and register complaints from consumers through multiple channels including:
 - (i) Walk-in customer care centres and area offices;
 - (ii) Toll-free helpline (operational during specified hours);
 - (iii) Emergency helpline (24x7 for emergency complaints);
 - (iv) Email to official grievance addresses;
 - (v) Online grievance portal on entity's website;
 - (vi) Mobile applications;
 - (vii) Chatbot;
 - (viii) QR code scanning at CNG stations and retail outlets;
 - (ix) Social media platforms;
 - (x) Government portals (CPGRAMS, IGMS, INGRAM, MoPNG eSEVA);
 - (xi) Complaint/suggestion books at distributorships and retail outlets;
 - (xii) Written letters or post.
- (f) The Consumer Complaint Cell shall acknowledge receipt of complaint within 24 hours and allot a unique complaint reference number which shall be communicated to the consumer through SMS and email.
- (g) The Consumer Complaint Cell shall categorize complaints as per Schedule B and resolve complaints within the specified TAT for each category.
- (h) The Consumer Complaint Cell shall maintain a comprehensive CRM system database of all complaints received, actions taken, and status updates accessible to consumers online.
- (i) The Consumer Complaint Cell shall submit quarterly reports to the Board in the format specified in Schedule C

IOCL LPG Inputs on point no 16:

- IOCL services **15.5 crore consumers**, representing **~47% of India's active LPG base**
- Daily delivery of **~30 lakh refills** demonstrates scale and operational robustness

To supply refill to 15.5 crore customer we have 51 Indane Divisional Offices(IDO) across India and in each IDO a customer service executive is posted wo primary job is complaint redressal. The IDOs are Divisional LPG head , hence person of the level of General Manager is not required.

- IOCL operates a **comprehensive, multi-channel grievance redressal system**
- Complaints can be lodged through **both digital and physical channels**
 - Complaint/Suggestion Book at all distributorships
 - Display of Field Officer & distributor contact details at all the distributorships
 - Customer Service Cells operating at Indane Divisional Offices
 - Toll-free Call Centre (8 AM–8 PM)
 - Online portals & IndianOil ONE App
 - Post / e-mail to IOCL
- Every complaint is:
 - Logged centrally
 - Assigned a **unique Service Request Number**
 - Trackable end-to-end
- Customers receive **automated acknowledgements and closure communications on their registered contact details (SMS/email)**
- Provision to **reopen complaints** ensures corrective oversight within the system
- With respect to Appellate provision there exists a Comprehensive grievance redressal mechanism with inbuilt auto escalation

As such a separate Consumer Complaint Cell is not required

17. Specific obligations of CGD entities

In addition to general obligations under Regulations 15 and 16, every CGD entity shall:

- (a) Provide new PNG connection within the timeline specified in Schedule A;
- (b) Maintain supply pressure and quality as per technical standards;
- (c) Provide advance intimation of at least 48 hours for planned supply interruptions;
- (d) Restore supply within specified time in case of unplanned interruptions;
- (e) Respond to emergency calls 24x7 with emergency response time within 2 hours;

IOCL CGD Inputs

To be modified as "Respond to emergency calls 24x7 with emergency response time within 3 hours"

- (f) Conduct periodic safety inspections of consumer installations;
- (g) Maintain accurate metering and billing systems;
- (h) Provide online access to bills and consumption data;
- (i) Comply with all provisions of Petroleum and Natural Gas Regulatory Board (Code of Practice for Quality of Service for City or Local Natural Gas Distribution Networks) Regulations, 2010;
- (j) Establish CNG stations with proper amenities;

- (k) Ensure safety at CNG stations and display safety instructions prominently;
- (l) Provide calibrated dispensing equipment at CNG stations with valid calibration certificates displayed;
- (m) Implement QR code-based complaint registration system at all CNG stations;
- (n) Display contact details of emergency helpline, customer care, and complaint escalation matrix at CNG stations and on website.

18. Specific obligations of OMCs and retail outlet dealers

Every OMC and retail outlet dealer shall:

- (a) Maintain adequate stock of petrol, diesel and other petroleum products;

IOCL Retail Inputs: Covered under “The Motor Spirit and High Speed Diesel Order, 2005”

- (b) Remain open during specified working hours (minimum 12 hours per day or as per state regulations);

IOCL Retail Inputs: Covered under “The Motor Spirit and High Speed Diesel Order, 2005”

- (c) Dispense unadulterated fuel meeting BIS quality standards;

IOCL Retail Inputs: Covered under “The Motor Spirit and High Speed Diesel Order, 2005”

- (d) Use calibrated and verified dispensing equipment with valid calibration certificate displayed prominently;

IOCL Retail Inputs: Covered under “the Legal Metrology Act”

- (e) Display Maximum Retail Price (MRP) prominently at each dispensing unit;

IOCL Retail Inputs: Covered under “the Legal Metrology Act”

- (f) Provide receipts for all transactions;

IOCL Retail Inputs: Covered under “the Legal Metrology Act”

- (g) Maintain cleanliness and hygiene at the outlet;

IOCL Retail Inputs: Covered under Citizen’s Charter and the Marketing Discipline Guidelines (MDG)”

- (h) Provide basic amenities including functional toilets, drinking water, and air filling services;

IOCL Retail Inputs: Covered under Citizen’s Charter and the Marketing Discipline Guidelines (MDG)”

- (i) Display consumer complaint registration mechanism prominently including contact details of Field Officer and escalation matrix;

IOCL Retail Inputs: Covered under Citizen’s Charter and the Marketing Discipline Guidelines (MDG)”

- (j) Not charge more than the Maximum Retail Price;

IOCL Retail Inputs: Covered under “the Legal Metrology Act”, Citizen Charter & MDG.

- (k) Comply with weights and measures regulations;

IOCL Retail Inputs: Covered under “the Legal Metrology Act”

- (l) Comply with fire safety and environmental regulations;

IOCL Retail Inputs: Covered under “the Legal Metrology Act”, Citizen Charter & MDG.

- (m) Maintain complaint/suggestion book at retail outlet and make it readily available to customers;

IOCL Retail Inputs: Covered under “the Legal Metrology Act”, Citizen Charter & MDG.

- (n) Display consumer rights board prominently;

IOCL Retail Inputs: Covered under “the Legal Metrology Act”, Citizen Charter & MDG.

- (o) Take suitable action against dealers in case any customer grievance is found genuine on investigation as per Marketing Discipline Guidelines (MDG);

IOCL Retail Inputs: Covered under “the Legal Metrology Act”, Citizen Charter & MDG.

- (p) For quality and quantity related complaints, ensure investigation is completed within specified TAT.

IOCL Retail Inputs: Covered under “the Legal Metrology Act”, Citizen Charter & MDG.

IOCL Retail Inputs: Since all the proposed obligations are already comprehensively addressed under various existing provisions and legislative acts, the introduction of additional regulations for retail operations is not recommended.

19. Specific obligations of LPG distributors and OMCs

Every LPG distributor and OMC shall:

- (a) Maintain adequate stock of LPG cylinders;
- (b) Deliver refills within specified timeframes as per service standards;
- (c) Provide LPG cylinders meeting quality and weight standards;
- (d) Operate emergency helpline on 24x7 basis for leakage complaints with appropriate standard operating procedures;
- (e) Provide toll-free helpline on all days;
- (f) Facilitate booking through multiple channels including online, telephone, and mobile app;
- (g) Ensure accurate subsidy credit and transparent billing;

- (h) Maintain complaint/suggestion book at distributorships readily available to customers;
- (i) Display contact numbers and addresses of Field Officers and Divisional Offices prominently;
- (j) Provide personal hearing to customers at specified times without prior appointment;
- (k) Respond to service-related complaints within 14 days from date of registration;
- (l) Dispatch mechanic for emergency leakage complaints immediately and ensure resolution.

IOCL LPG Inputs on point no 19:

To add the following :

Distributors to carry out pre delivery checks at the time of delivery of refill to the customer.

CHAPTER V: COMPLAINT CATEGORIZATION AND CLASSIFICATION

20. Complaint categories for PNG consumers

Complaints from PNG domestic, commercial and industrial consumers shall be classified under the following categories:

(a) Category A: Emergency/Critical Complaints

- (i) Gas leakage, fire, explosion or any safety emergency;
- (ii) Complete disruption of gas supply (fault/disruption in service);
- (iii) Severe pressure issues affecting appliance operation;
- (iv) Billing errors exceeding 25% of average bill amount.

IOCL CGD Inputs	Justification
Billing issues not to be considered in Emergency / Critical complaints and may be placed under High Priority Service Complaints in Category B	Emergency/Critical complaints in CGD are defined by the presence of: 1. Immediate risk to life or property 2. Potential for fire, explosion, or gas leakage 3. Threat to pipeline integrity or supply continuity Billing issues pose no safety risk or impact on CGD infrastructure or gas operations. As per industry norms, they are not classified as emergencies or critical issues.

(b) Category B: High Priority Service Complaints

- (i) Activation related: Delay in new PNG connection activation;
- (ii) Partial supply failure or frequent interruptions;
- (iii) Pressure related: Inadequate or fluctuating gas pressure;
- (iv) Metering related: Faulty meter, incorrect meter reading, delay in replacement;
- (v) Billing disputes: Incorrect bill amounts, estimated bills, abnormal consumption charges;
- (vi) Payment related: Wrong payment posting, double debit, non-receipt of acknowledgment.

(c) Category C: Normal Service Complaints

- (i) Service quality: Poor response time, customer service inefficiency, staff behaviour issues;
- (ii) Delay in Restoration
- (iii) Minor billing or payment issues;
- (iv) Alteration of Connection
- (v) Temporary Disconnection and Name Change
- (vi) Information requests and general queries;

- (vii) Requests such as pipe-related work
- (viii) Other service-related issues not falling under Category A or B.
- (d) The following shall not be treated as complaints but as service requests:
 - (i) Mobile number change, address change;
 - (ii) Queries such as bill cycle information, walk-in centre address;
 - (iii) Queries on new CNG distributorship.

21. Complaint categories for CNG consumers

Complaints from CNG consumers shall be classified under the following categories:

(a) Category A: Critical Complaints

- (i) Safety issues at CNG station;
- (ii) Unsafe filling procedures;
- (iii) Gas leakage or fire at CNG station

(b) Category B: Service Complaints

- (i) Payment related: Wrong billing, excess charges, non-refund of change, payment system failures; Non-issuance of Bill / Receipt, Incorrect Tax or Surcharge Application
- (ii) CNG filling related: Improper filling, incomplete refueling, closure of CNG station, denial of service;
- (iii) Pressure & Quality related: Low or inconsistent CNG pressure causing under-filling;
- (iv) Service quality: Staff behavior, lack of basic amenities (washroom, drinking water, air filling), high waiting time.
- (v) Facility Related: Non-availability of CNG / Station Out of Service, Dispenser / Equipment Malfunction, Poor Infrastructure / Maintenance, Safety & Security Issues, Non-functional Digital Payment / POS Systems, Improper Display of Information
- (vi) Information requests and general queries
- (vii) Others: Any other complaints/issues not falling from the above Category A or B

22. Complaint categories for LPG consumers

Complaints from LPG consumers shall be classified under the following categories:

(a) Category 1: Emergency/Leakage Complaints

- (i) Leakage from cylinder;
- (ii) Leakage from LPG cylinder valve knob;
- (iii) Leakage from pressure regulator;
- (iv) Leakage from LPG hose/pipe;
- (v) LPG cylinder O-ring or washer leakage;
- (vi) Leakage from hot plate.

(b) Category 2: Service-Related Complaints

- (i) Delay in refill delivery;

- (ii) Mechanic service issues;
 - (iii) Unable to book cylinder;
 - (iv) Issues related to new connection or Double Bottle Connection (DBC);
 - (v) Overcharging.
 - (vi) Subsidy related issues;
 - (vii) Forced sale of hotplate;
 - (viii) Rude behavior of showroom staff or deliveryman;
 - (ix) Cylinder quality or quantity related issues;
 - (x) Online service or payment related issues;
 - (xi) Others.
- (c) The following shall be excluded from complaint classification:
- (i) Change of mobile number;
 - (ii) Query on new distributorship;
 - (iii) Query on appointment as Urja Sakhi

IOCL LPG Inputs on point (c) :

All types of queries seeking information to be excluded.

23. Complaint categories for retail outlet consumers

Complaints from retail outlet consumers shall be classified under the following categories:

(a) Grade G1: General Complaints

- (i) Digital payment related: Money debited twice, excess amount debited, EDC machine not working, card not accepted;
- (ii) Facility related: Washroom, drinking water, air service issues;
- (iii) Service related: Air service charged, high wait time, staff behaviour, bill not provided, air inflator not working;
- (iv) Others: Low mileage, density not visible in display unit.

(b) Grade G2: Critical Complaints

- (i) Product quality and quantity: Less fuel filled, Fuel tank capacity discrepancy, Meter not set to zero, adulteration suspected.
- (ii) Wrong product filled.

- (c) For quality and quantity related issues, consumer should report the grievance within 24 hours of purchase of the product
- (d) The following shall be excluded: Third-party vendor complaints and Judicial or police matters

IOCL Retail Inputs: IOC has categorized all the discrepancies as follows:

All the Grade 1 complaints proposed are covered under MINOR category of the MDG. Any deviation in offering these services attracts penal provisions as mandated in the MDG.

*Low Mileage depends on various factors and linking it with fuel will be disputable.

All the Grade 2 complaints proposed are covered under MAJOR / CRITICAL category of the MDG. Any deviation attracts penal provisions as mandated in the MDG.

Since the proposed regulation framework already exists comprehensively within the MDG, the introduction of a separate regulatory system for retail operations is not recommended.

CHAPTER VI: GRIEVANCE REDRESSAL MECHANISM

24. Four-tier grievance redressal framework

- (a) A standardized four-tier grievance redressal mechanism shall apply uniformly across the oil and gas sector:
- (i) **Tier 1:** Consumer Complaint Cell / Customer Care of the entity (First Point of Contact)
 - (ii) **Tier 2:** In-charge Customer Care / Nodal Officer at entity level
 - (iii) **Tier 3:** Appellate Authority at entity level
 - (iv) **Tier 4:** PNGRB Escalation Portal (IGMS) / ~~Ombudsman~~ / Board

IOCL CGD Inputs	Justification
To be modified as "Tier 4: PNGRB Escalation Portal (IGMS) / Board"	As the CGD consumers are covered under general consumer protection rules, an Ombudsman is not required for the sector. Complaint to the Ombudsman will add too much of compliance burden on the fledgling CGD industry.
Remove Ombudsman	

- (b) A consumer shall first approach the Consumer Complaint Cell of the entity through any of the available channels.
- (c) If a complaint is not resolved within the specified TAT or the consumer is not satisfied with the resolution, the complaint shall be escalated to the next tier either automatically or by the consumer.
- (d) If the complaint remains unresolved even at the Appellate Authority level, the consumer may escalate the matter to the PNGRB through IGMS portal.
- (e) Consumers may also approach the Ombudsman for mediation-based resolution at any stage after exhausting entity's internal mechanism up to Appellate Authority level.

IOCL CGD Inputs

Clause (e) to be removed

- (f) The board may conduct an assessment/review of the internal grievance redressal mechanism of the entity as and when required.
- (g) Nothing in these regulations shall bar a consumer from approaching consumer forums under the Consumer Protection Act, 2019 or any other legal remedy.

IOCL LPG Inputs on point no 24:

- IOCL operates a **comprehensive, multi-channel grievance redressal system**
- Complaints can be lodged through **both digital and physical channels**
 - Complaint/Suggestion Book at all distributorships
 - Display of Field Officer & distributor contact details at all the distributorships
 - Customer Service Cells operating at Indane Divisional Offices
 - Toll-free Call Centre (8 AM–8 PM)
 - Online portals & IndianOil ONE App
 - Post / e-mail to IOCL
- Every complaint is:
 - Logged centrally
 - Assigned a **unique Service Request Number**
 - Trackable end-to-end
- Customers receive **automated acknowledgements and closure communications on their registered contact details (SMS/email)**
- Provision to **reopen complaints** ensures corrective oversight within the system

In view of the above, the proposed framework with the mentioned obligations are repetitive and not recommended. We have already expressed our reservation on Ombudsman

25. Turnaround Time (TAT) for complaint resolution

- (a) Every entity shall resolve complaints within the TAT specified in Schedule B for different categories of complaints.
- (b) The TAT for PNG consumer complaints shall be:

Category	Type of Complaint	TAT
Category A (Emergency/Critical)	Gas leakage, fire, complete supply failure, billing errors >25%	Immediate action; resolution within 24 hours
Category B (High Priority)	Activation, partial supply failure, pressure, metering, billing, payment issues	7 working days
Category C (Normal)	Service quality, minor issues, general complaints	15 working days

IOCL CGD Inputs	Justification
Billing errors >25% to be removed from Category A and moved to Category B	Same as 20.a.iv above

- (c) The TAT for CNG consumer complaints shall be 7 working days for all categories.

(d) The TAT for LPG consumer complaints shall be:

Category	TAT
Category 1 (Emergency/Leakage)	Immediate response; mechanic dispatch within 30 minutes
Category 2 (Service-Related)	Within 24 hours for initial response; 14 days for resolution

IOCL LPG Inputs:

IOCL has a dedicated help line for emergency complaints where in safety tips and dos & don'ts are provided to the customer once he lodges a leakage complaint, hence mechanic dispatch time is not required.

IOCL have a 24 hour emergency helpline (1906) with escalation matrix for immediate response/resolution.

(e) The TAT for retail outlet consumer complaints shall be:

Grade	Initial Response	Resolution TAT
G1 (General)	Within 72 hours	7 working days
G2 (Critical)	Within 72 hours	15 working days

IOCL Retail Inputs: IOC is already giving initial response within 72 hours. Further resolution will be as per the Citizen's Charter, except cases where fuel quality needs to be checked.

The proposed regulatory system for retail operations is not recommended as existing mechanisms are already in place and functioning effectively.

Exclusions: Third-party vendor complaints, judicial or police matters

(f) If a complaint cannot be resolved within the specified TAT due to circumstances beyond control (natural calamities, strikes, system breakdowns, or cases warranting detailed investigation), the entity shall:

- (i) Send an interim reply to the consumer explaining the reasons for delay;
- (ii) Provide a revised timeline for resolution;
- (iii) Keep the consumer informed of progress.

26. Escalation matrix for PNG consumers

(a) The escalation matrix for PNG consumer complaints shall be:

Tier	Level	Authority	Type of Complaints	TAT	Auto-Escalation
Tier 1	Level 1	Customer Care / Walk-in Centres	All fresh complaints	As per Category TAT	After defined TAT
	Level 2	In-charge Customer Care / GA In-charge	Unresolved at Level 1, Out of TAT, Repeated complaints	As per entity policy	If not resolved within TAT
Tier 2	Level 3	Nodal Officer	Unresolved at Level 2, Out of TAT, Repeated complaints	7 working days	If not resolved within TAT
Tier 3	Level 4	Appellate Authority	Unresolved at Level 3, Out of TAT, Repeated complaints	7 working days	If not resolved within TAT
Tier 4	Level 5	PNGRB IGMS Portal / Ombudsman	Unresolved at Appellate level	As per Board process	Consumer may escalate

- (b) If a complaint is not resolved within the defined TAT, it shall automatically be escalated to the next level.
- (c) A consumer may also manually escalate a complaint to the next level if not satisfied with the resolution provided.
- (d) The escalation matrix shall be prominently displayed on entity's website, mobile app, bills, and at all customer touchpoints.

27. Escalation matrix for CNG consumers

The escalation matrix for CNG consumer complaints shall be:

Tier	Level	Authority	TAT (Working Days)
Tier 1	Level 1	Field Officer/ CNG Station In-charge	7
	Level 2	Territory Sales Manager	7
Tier 2	Level 3	Nodal Officer	7
Tier 3	Level 4	Appellate Officer	7
Tier 4	Level 5	PNGRB IGMS Portal / Ombudsman	As per Board process

28. Escalation matrix for LPG consumers

The escalation matrix for LPG service-related complaints (Category 2) shall be:

Tier	Level	Authority	Response Time	Escalation Time
Tier 1	Level 1	LPG Distributor / Local Dealer	Within 48 hours	If no resolution in 48 hours
	Level 2	Customer Service Cell / Divisional Office	Within 3 working days	If no resolution in 3 days
	Level 3	Divisional Manager / Territory Manager	Within 5 working days	If no resolution in 5 days
Tier 2	Level 4	State Office / Nodal Officer	Within 7 working days	If no response in 7 days
Tier 3	Level 5	Corporate Office / Appellate Authority	Within 14 working days	Final entity-level resolution
Tier 4	Level 6	PNGRB IGMS Portal / Ombudsman	As per Board process	If unresolved at Level 5

29. Escalation matrix for retail outlet consumers

The escalation matrix for retail outlet consumer complaints shall be:

Tier	Level	Authority	TAT (Working Days)
Tier 1	Level 1	Field Officer / Retail Outlet In- charge	3
	Level 2	Territory Sales Manager / Divisional Manager Retail Head	3
	Level 3	State Retail Head	3
Tier 2	Level 4	State/Regional Head (Nodal Officer)	3
Tier 3	Level 5	Appellate Officer	3
Tier 4	Level 6	PNGRB IGMS Portal / Ombudsman	As per Board process

IOCL Retail Inputs:

Existing System:

- Dealer/Outlet In-charge
- Field Officer (Area Manager)
- Territory Manager / Regional Manager / Divisional Manager
- Consumer Court (if needed)

PNGRB Proposed: 6 internal levels + PNGRB portal + Ombudsman.

Critical Concerns:

- 1. Each escalation level compounds delays:** The regulations specify 3 working days at each of 6 levels, resulting in a minimum of 18 working days before reaching the PNGRB portal—significantly delaying resolution for time-sensitive issues.
- 2. Most retail complaints are inherently location-specific:**
Quality and quantity issues require immediate on-site resolution and investigation, not prolonged corporate-level escalation that distances decision-makers from the actual problem.
- 3. The existing 3-tier system has proven effective:** Field Officers can resolve most routine issues expeditiously; Regional Managers handle complex cases requiring broader judgment; and Consumer Courts provide final recourse for unresolved disputes.
- 4. Disproportionate bureaucratic burden on small-scale dealers:** A single retail outlet franchisee, often operating as a proprietorship or small partnership, would be required to understand, implement, and maintain a complex 6-level escalation matrix—an unrealistic expectation given their limited administrative capacity.
- 5. Ombudsman capacity concerns:** With consumers having direct access to the Ombudsman, there is a significant likelihood of premature escalation, bypassing intermediate resolution mechanisms. This raises serious questions about whether the Ombudsman system possesses adequate resources and capacity to deliver timely redressal within stipulated timeframes, particularly given the volume of retail outlets across the country.

The excessive complaint escalation hierarchy proposed in the draft regulation creates unnecessary complexity without commensurate benefit. Therefore, this regulatory framework is not recommended for retail operations.

30. Complaint registration and acknowledgment

- (a) Every entity shall register complaints received through any channel in its CRM system immediately upon receipt.
- (b) The entity shall acknowledge receipt of complaint within 24 hours of registration.
- (c) A unique complaint reference number shall be generated and communicated to the consumer through SMS and email.
- (d) The acknowledgment shall contain:
 - (i) Complaint reference number;
 - (ii) Date and time of registration;
 - (iii) Category of complaint;

- (iv) Expected resolution timeline (TAT);
- (v) Contact details of officer handling the complaint;
- (vi) Link to track complaint status online.

IOCL CGD Inputs Clauses 30.d.v and 30.d.vi to be omitted	Justification 30.d.v : Complaints in CGD are meant to be handled through: • Customer care centres • Designated complaint desks • Centralised CRM / call centres Sharing individual officer details shifts accountability from the system to a person, which is contrary to structured service delivery and will weaken institutional processes. Also, there is risk of harassment and misuse of personal contact details 30.d.vi: In CGD, Mandating online-only tracking would exclude a significant section of consumers, especially elderly users, domestic PNG consumers, and those in areas with limited digital access. Also, CGD consumers raise complaints through multiple modes and is essential also, hence tracking of complaints in CGD is not possible. A hybrid mechanism ensuring immediate response, accountability, and regulatory compliance is more appropriate.
---	---

- (e) For emergency complaints, immediate action shall be initiated without waiting for formal registration process.

IOCL LPG Inputs: The Acknowledgment given in SMS has limitations and cannot contain all the above-mentioned details. The primary contact of the customer for grievance resolution is the LPG Distributor, whose contact details are well available with the customer as such giving additional contact details may be confusing for the customer.

31. Complaint closure protocol

- (a) A complaint shall be marked as "Closed" only after:
 - (i) Corrective action has been taken;
 - (ii) Resolution has been communicated to the consumer;
 - (iii) Consumer confirmation has been obtained (where required).

- (b) Consumer confirmation shall be obtained through:
 - (i) Verbal confirmation for emergency/critical complaints;
 - (ii) SMS/email confirmation for other complaints;
 - (iii) Automated confirmation after 48 hours if consumer does not respond after 3 confirmation attempts.

IOCL CGD Inputs

To be modified as "Automated confirmation after 48 hours if consumer does not respond after 2 confirmation attempts."

- (c) Closure details shall be updated in the CRM system including:
 - (i) Resolution provided;
 - (ii) Date and time of closure;
 - (iii) Officer who resolved the complaint;

IOCL CGD Inputs

Clauses 31.c.iii to be omitted

Justification

Same as 30.d.v above.

- (iv) Consumer confirmation status.
- (d) A closure SMS/email shall be sent to the consumer with details of resolution
- (e) The entity shall maintain complete audit trail of all complaints from registration to closure.

IOCL LPG Inputs:

IOCL serves 15.5 crore customers.

Waiting for customer confirmation is not practical. Consumer confirmation is not needed for closure of complaints as customers already have an option of reopening of the complaints.

32. Reopening of complaints

- (a) A consumer may reopen a complaint within **7 days of closure** if:
 - (i) The issue has not been actually resolved;
 - (ii) The resolution provided is not satisfactory;
 - (iii) The same issue has recurred.
- (b) Reopened complaints shall be:
 - (i) Auto-escalated to the next level authority;
 - (ii) Given priority status;
 - (iii) Tracked separately in the CRM system
- (c) The entity shall not close a reopened complaint without obtaining explicit confirmation from the consumer that the issue is resolved to their satisfaction.

33. PNGRB Integrated Grievance Management System (IGMS) Portal

- (a) The Board shall establish and maintain a centralized online Complaint Escalation Portal (IGMS Portal) for the oil and gas sector.
- (b) The IGMS Portal shall serve as the final escalation platform for complaints that remain unresolved or are not resolved satisfactorily after exhausting an entity's internal grievance redressal mechanism up to Appellate Authority level.
- (c) A consumer may register a complaint on the IGMS Portal if:
 - (i) The complaint has been registered with the entity and has crossed the stipulated TAT without resolution;
 - (ii) The consumer has escalated the complaint to the Appellate Authority of the entity;
 - (iii) The consumer is not satisfied with the resolution provided by the entity;
 - (iv) The entity has not provided any response despite multiple attempts by the consumer.
- (d) The Board shall monitor complaints registered on the PNGRB IGMS Portal and may:
 - (i) Direct entities to take specific actions;
 - (ii) Impose penalties for non-compliance;
 - (iii) Conduct inspections or audits;
 - (iv) Refer matters to Ombudsman;
 - (v) Take any other action deemed necessary.

CHAPTER VII: COMPENSATION FRAMEWORK

34. Right to compensation

- (a) Every consumer shall have the right to compensation for deficiency in service by the entity as specified in this Chapter and Schedule A.
- (b) The entity shall pay compensation to the consumer without waiting for a complaint if the deficiency in service is clearly attributable to the entity.
- (c) The compensation shall be in addition to any other relief that the consumer may be entitled to under any law for the time being in force.
- (d) Compensation shall not be payable for service deficiencies arising due to:
 - (i) Force majeure events;
 - (ii) Acts of God (natural calamities, earthquakes, floods);
 - (iii) Consumer's own negligence or violation of safety norms;
 - (iv) Third-party damage to infrastructure;
 - (v) Government directives or regulatory orders.

IOCL LPG Inputs:

The customers of IOCL are being served by Indane LPG Distributors and the distributor is therefore liable for any service deficiency and as such will have to bear the compliance and compensation cost.

LPG is a highly subsidized product with very high under recovery.

The customer has an option to select the distributor within the OMC (for refill delivery) of his choice in a multiple distributor market. Further he is also having an option to go to distributors of his choice by getting a termination voucher and getting the connection from a distributor of his choice at the same security deposit.

There is no defect possible in billing of the LPG cylinder as the same is billed for only one cylinder.

Hence no compensation is warranted.

Moreover, there will be avenues for malpractice.

IOCL CGD Inputs	Justification
Compensation to be removed completely. Only Insurance part may be kept.	- Domestic PNG connections require completion of the entire CGD infrastructure (City Gate Station, steel pipelines, DRS, MDPE pipeline and LMC works etc.), which takes significant time and depends on permissions and land availability. - Delays caused by statutory approvals, customer readiness, or safety requirements are not considered as service deficiency and hence, do not qualify for compensation. - Compensation applies to disruption in existing services, not delays in initiating new ones. Pre-commissioning delays are part of service setup and not a failure. - Timelines for new connections are indicative, depending on site feasibility and approvals. Documented and justified

	delays do not indicate negligence. 5. IOCL CGD GAs have been authorised only during 9th-11th round of bidding. Applying penal provisions without waiting for the infrastructure maturity will be a deterrent in growth. 6. There is already a provision available in PNGRB regulation for refund of security deposit with interest if the connection is not provided in 90 days time. This provision is sufficient for the intended purpose. 7. Proposed provision will provide a means to frivolous customers to demand PNG connection and seek compensation.
--	--

35. Compensation for PNG consumers -

S. No.	Service Aspect	Condition / Description	Compensation Amount
(a)	Delay in providing new PNG connection	Delay beyond timeline specified in Schedule A	- Domestic: ₹100 per day (max ₹5,000) - Commercial: ₹200 per day (max ₹10,000) - Industrial: As per contractual SLA or ₹500 per day, whichever is higher
(b)	Supply interruption	(i) Unplanned interruption > 24 hrs	₹100 per day, max ₹3,000 per month
		(ii) Planned interruption without 48-hr notice	₹500
(c)	Emergency response delay	Response time exceeds 2 hours	₹1,000
(d)	Billing errors	(i) Consumer overpaid due to billing error	Refund of excess in next bill + interest at SBI PLR
		(ii) Error exceeds 10% of average of last 3 months' bills	Additional ₹500
(e)	Quality deficiency	Gas does not meet quality parameters	- Domestic: ₹500 per instance - Commercial: ₹2,000 per instance - Industrial: Actual quantifiable loss or ₹10,000, whichever is higher
(f)	Meter-related issues	Meter inaccuracy beyond permissible limit with testing delay > 7 days	₹500
(g)	Complaint resolution delay	Failure to resolve complaint within specified TAT	- Category A (Critical): ₹1,000/day, max ₹10,000 - Category B (High Priority): ₹500/day, max ₹5,000 - Category C (Normal): ₹200/day, max ₹2,000

36. Compensation for CNG consumers -

- Quality and quantity issues: If CNG dispensed is found to be of sub-standard quality or under-filled, entity shall pay compensation equal to three times the value of CNG purchased.
- Complaint resolution delay: For failure to resolve complaints within 7 working days TAT: Rs. 200 per day of delay, maximum Rs. 2,000.

- (c) Safety violations: If safety standards are violated at CNG station resulting in consumer inconvenience: Rs. 1,000 per instance.

IOCL CGD Inputs

Clauses 35 & 36 to be completely removed.

37. Compensation for LPG consumers

- (a) Compensation for LPG consumers shall be governed by the existing framework under:
- (i) Marketing Discipline Guidelines (MDG);
 - (ii) Liquefied Petroleum Gas (Regulation of Supply and Distribution) Order, 2000;
 - (iii) Any other applicable orders and guidelines of Ministry of Petroleum and Natural Gas.
- (b) For emergency leakage complaints (Category 1):
- (i) If mechanic is not dispatched within 30 minutes: Rs. 500
 - (ii) If issue is not resolved within reasonable time causing consumer inconvenience: Additional compensation as deemed fit by entity.
- (c) For service-related complaints (Category 2):
- (i) For delay in refill delivery beyond committed timeline: As per entity's policy and MDG For cylinder quality/quantity issues: As per MDG framework.

IOCL LPG Inputs:

Current scenario does not provide compensation to LPG customer.

Moreover, Domestic LPG is already a heavily subsidized product wherein the focus is affordability and accessibility of LPG to the entire population of the country even in the remotest area. Compensation is not recommended.

It is endeavored to resolve Leakage complaints in least amount of time but putting time pressure on mechanic will have unintended consequences as he is dealing with a highly flammable product and should be in calm mental composure while dealing with emergencies.

Moreover, there will be avenues for malpractice.

38. Compensation for retail outlet consumers

- (a) Compensation for retail outlet consumers shall be governed by:
- (i) Marketing Discipline Guidelines (MDG);
 - (ii) Motor Spirit and High-Speed Diesel (Regulation of Supply, Distribution and Prevention of Malpractices) Order, 2005 and Amendment Order, 2019;
 - (iii) Any other applicable orders and guidelines.
- (b) **Adulteration or short-fueling:** If fuel dispensed is found to be adulterated or short-measured, entity shall pay compensation equal to three times the value of fuel purchased, as per MDG.
- (c) **Quality issues:** If fuel quality does not meet BIS standards causing damage to vehicle or inconvenience: Compensation as per MDG framework including actual loss.

- (d) **Complaint resolution delay:** For failure to resolve G2 (Critical) complaints within 15 working days: Rs. 200 per day of delay, maximum Rs. 2,000.

IOCL Retail Inputs:

Marketing Discipline Guidelines (MDG) is already available, which categorises the various irregularities at ROs into **Critical, Major and Minor categories** and covers penal actions in detail in case of established irregularities.

PNGRB Proposal:

- Rs. 200 per day for G2 complaint delay, max Rs. 2,000
- Three times fuel value for adulteration (from MDG)

Our Response:

1. **Penalty for Adulteration is already covered in MDG for dealers and the consumers are protected through the consumer court/forum.**
2. **The resolution of complaints depends on various factors that cannot be constrained by a fixed timeline. For instance, issues requiring sample testing are time-consuming, and the availability of customers for resolution may vary. Consequently, complaints cannot always be resolved within the proposed timeframe. Hence, the proposed penalty is not tenable.**

Therefore, the proposed regulatory system for retail operations is not recommended, as comprehensive remedial mechanisms are already available to consumers under the Consumer Protection Act, 2019.

39. Compensation for accidents and property damage (CGD sector)

- (a) For incidents in the CGD sector involving accidents, injuries, deaths, or property damage attributable to entity's operations or equipment failure, the following indicative compensation framework shall apply:
- (i) Death: Rs. 6 lakhs per consumer
 - (ii) Medical expenses:
 - (iii) Maximum Rs. 2 lakhs per consumer
 - (iv) Immediate relief up to Rs. 25,000 per person
 - (v) Property damage: Maximum ~~Rs. 30 lakhs~~ per event at registered consumer's premises
- (b) The above compensation shall be either directly or through any insurance coverage maintained by the entity.
- (c) Actual compensation in specific cases shall be determined based on:
- (i) Assessment of damage/loss;
 - (ii) Medical reports and bills;
 - (iii) Investigation findings on cause of incident;
 - (iv) Applicable legal provisions;
 - (v) Settlements reached with affected parties.

- (d) CGD entities shall maintain appropriate insurance coverage including:
- (i) Public Liability Insurance (PLI);
 - (ii) Comprehensive General Liability (CGL);
 - (iii) Contractors All Risk (CAR);
 - (iv) Any other insurance as specified by the Board
- (e) For OMCs (LPG and retail outlets), compensation for accidents shall be governed by existing well-established frameworks under MDG and other applicable guidelines.

IOCL LPG Inputs:
OMCs are also having Public Liability Insurance policy for giving compensation on accident and property damage.

IOCL CGD Inputs	Justification
to be aligned with LPG customers.	CGD installations at consumer premises involve low-pressure gas and limited infrastructure (service line, meter, regulator) with strong safety safeguards. The risk of high-value damage is minimal. The current ₹30 lakh per-event cap is disproportionately high, considering the low damage potential and existing property insurance coverage. A lower, risk-based limit is more appropriate. Higher caps increase insurance costs, which are recovered through consumer tariffs—unjustified given the low risk. Thus, the ₹30 lakh cap exceeds realistic damage expectations and should be rationalised.

40. Payment of compensation –

- (a) Compensation payable under this Chapter shall be:
- (i) Automatically credited to consumer's account; or
 - (ii) Adjusted in the next bill; or
 - (iii) Paid through cheque/electronic transfer within 15 days of determination.
- (b) No separate complaint shall be required for compensation which is automatically payable as per these regulations.
- (c) The entity shall inform the consumer about the compensation paid through SMS/email.
- (d) Entities shall maintain a register of all compensation paid and submit quarterly reports to the Board.

IOCL LPG Inputs on point no 40:

The customers are being served by LPG Distributors with whom IOCL has principal to principal agreement, and the distributor is therefore liable for any service deficiency and as such will have to bear the compliance and compensation cost. It may lead to resistance to serve certain customers or areas.

OMCs are also having Public Liability Insurance policy for giving compensation on accident and property damage subject to availability of requisite documentation which is to be given by the customer.

Moreover, there will be avenues for malpractice.

IOCL CGD Inputs

Clause 40 to be completely removed.

41. Consumer Protection Fund -

- (a) The Board may establish a Consumer Protection Fund to which entities shall contribute an amount as may be specified by the Board from time to time.
- (b) The Consumer Protection Fund shall be utilized for:
 - (i) Payment of compensation to consumers in deserving cases;
 - (ii) Consumer awareness and education programmes;
 - (iii) Establishment and operation of Ombudsman;
 - (iv) Support to VCOs and NGOs;
 - (v) Any other purpose for consumer protection as decided by the Board.
- (c) The Board shall maintain separate accounts for the Consumer Protection Fund and prepare annual statements.
- (d) The Board shall publish the details of utilization of the Consumer Protection Fund annually.

IOCL LPG Inputs:

LPG business is reeling under severe under recovery as Government of India is ensuring that the prices of Domestic LPG remain within reach of common man.

Any contribution to the board should be adequately compensated to IOCL .

IOCL CGD Inputs

Clauses 40 & 41 to be completely removed

Justification

Creation of a separate Consumer Protection Fund would result in duplication of existing mechanisms, increase compliance and administrative burden, and will lead to inefficient fund management without delivering proportionate consumer benefit.

CHAPTER VIII: FEEDBACK MECHANISM

42. Post-closure feedback collection

- (a) Every entity shall collect feedback from consumers after closure of complaints to assess satisfaction levels and service quality.
- (b) Feedback shall be collected through:
 - (i) Post-closure SMS with rating scale (1-5 stars) and option for remarks;
 - (ii) Post-closure email survey with detailed questionnaire;
 - (iii) IVRS (Interactive Voice Response System) outbound calls;
 - (iv) Mobile app or web portal rating and comments;
 - (v) In-person feedback or field visits for critical/escalated cases.

IOCL CGD Inputs

Any one method of the 5 suggested methods must be adopted and feedback for only 10% of the total complaints shall be taken

- (c) The feedback survey shall ask consumers to rate:
 - (i) Ease of complaint registration;
 - (ii) Promptness of response;
 - (iii) Quality of resolution;
 - (iv) Behaviour of staff;
 - (v) Overall satisfaction with complaint handling.
- (d) Feedback shall be collected within 48 hours of complaint closure.
- (e) Consumers shall have the option to provide additional comments or suggestions.

43. Feedback analysis and action

- (a) Entities shall analyse feedback data and generate weekly/monthly reports highlighting:
 - (i) Number of complaints closed with feedback;
 - (ii) Average satisfaction score;
 - (iii) Number of complaints reopened due to poor resolution;
 - (iv) Category-wise and geography-wise performance;
 - (v) Trends and patterns in consumer dissatisfaction.
- (b) Low ratings (3 stars or below) shall be:
 - (i) Reviewed by supervisors for root cause analysis;
 - (ii) Used for identifying training needs;
 - (iii) Escalated for corrective action if systemic issues are identified.
- (c) Entities shall use feedback data for:
 - (i) Continuous improvement of complaint handling process;
 - (ii) Identifying service gaps and deficiencies;
 - (iii) Training and capacity building of staff;
 - (iv) Recognizing and rewarding good performance;

- (v) Informing policy and process changes.
- (d) Feedback analysis reports shall be submitted to senior management on a monthly basis.
- (e) Aggregated feedback data shall be included in quarterly reports to the Board.

44. Display of consumer feedback

- (a) Entities may display aggregated consumer feedback and satisfaction scores on their website and mobile app to promote transparency.
- (b) Positive feedback and testimonials may be used for consumer awareness and building trust.
- (c) Areas of improvement identified through feedback shall be communicated to consumers along with action taken.

IOCL LPG Inputs 42 to 44:

LPG is a highly subsidized essential commodity with the focus on accessibility to poorest of poor and even in the remotest corner of the country.

There are already avenues available to customer to register feedback therefore not required.

IOCL CGD Inputs

Clause 44.a to be revised as " Entities may display aggregated consumer feedback and satisfaction scores on their website and mobile app periodically to promote transparency."

Clause 44 (c) to be removed

CHAPTER IX: QUALITY OF SERVICE STANDARDS

45. Applicability of quality-of-service standards

- (a) Every entity shall comply with the quality-of-service standards specified in Schedule A.
- (b) The quality-of-service standards shall cover:
 - (i) Connection related standards and timelines;
 - (ii) Supply related standards (quality, pressure, availability);
 - (iii) Metering and billing standards;
 - (iv) Complaint handling standards and TAT;
 - (v) Safety and emergency response standards;
 - (vi) Customer service standards.
- (c) The Board may, from time to time, revise the quality-of-service standards by notification.

46. Incorporation of existing quality of service regulations

- (a) The provisions of Petroleum and Natural Gas Regulatory Board (Code of Practice for Quality of Service for City or Local Natural Gas Distribution Networks) Regulations, 2010, in so far as they relate to quality-of-service obligations, shall be deemed to be incorporated in these regulations and shall apply to CGD entities.
- (b) In case of any conflict between the provisions of these regulations and the regulations referred to in sub-regulation (a), the provisions of these regulations shall prevail.

47. Monitoring of quality-of-service standards

- (a) Every entity shall monitor its performance against quality-of-service standards on a monthly basis.
- (b) Every entity shall submit quarterly reports on quality-of-service performance to the Board in the format specified in Schedule D.
- (c) The Board may conduct inspections and audits to verify compliance with quality-of-service standards.
- (d) The Board may publish annual reports on quality-of-service performance of entities with entity-wise and parameter-wise analysis.

48. Benchmarking and best practices

- (a) The Board shall establish benchmarks for quality-of-service performance based on national and international best practices.
- (b) The Board may recognize and reward entities achieving excellence in quality of service.
- (c) The Board may direct entities not meeting quality of service standards to submit improvement plans with specific targets and timelines and monitor their implementation.

IOCL LPG Inputs 45 to 48:

The service standards are already available at IOCL in form of Citizen Charter/ feedback mechanism / Gas Control order etc. Hence not required.

CHAPTER X: TRANSPARENCY AND INFORMATION DISCLOSURE

49. Obligation to disclose information.

- (a) Every entity shall disclose the following information to consumers and the public prominently and comprehensively:
 - (i) Tariff and Pricing Information:
 - a. Network tariff for CGD; Compression charges for CNG;
 - b. Maximum Retail Price for petrol, diesel and LPG; Billing methodology and structure;
 - c. Security deposit requirements;
 - d. All charges and levies.
 - (ii) DPNG & CNG Price Breakup data: On a monthly basis, in Public Interest, provide the DPNG and CNG price breakup data. The same has to be uploaded through PNGRB e-portal, timely by 20th of succeeding month, and by 30th of succeeding month, in case of Quarter month) as per the Schedule “E” of this regulation.
- (b) Service Standards:
 - (i) Timeline for new connections;
 - (ii) Timeline for complaint resolution (TAT) for each category; Compensation policy for service deficiencies;
 - (iii) Quality parameters and standards.
- (c) Contact Information:
 - (i) Customer care toll-free helpline with operating hours; Emergency helpline (24x7) with prominent display; Email and postal address for complaints;
 - (ii) Details of Consumer Complaint Cell with address;
 - (iii) Name, designation and contact details of Principal Nodal Officer;
 - (iv) Name, designation and contact details of Nodal Officers (regional/zonal); Name, designation and contact details of Appellate Authority;
 - (v) Contact details of Ombudsman; Link to PNGRB IGMS Portal for escalation.
- (d) Rights and Obligations:
 - (i) Rights of consumers under these regulations; Obligations of consumers;
 - (ii) Grievance redressal mechanism with flowchart; Escalation matrix with TAT at each level; Information on how to access PNGRB IGMS Portal.
- (e) Safety Information:
 - (i) Safety guidelines for consumers (dos and don'ts); Emergency procedures in case of

leakage, fire, or accident; Contact details for emergency response.

- (f) Performance Information:
 - (i) Supply interruption statistics (planned and unplanned);
 - (ii) Complaint statistics (category-wise, registered, resolved, pending); Quality of service performance against standards;
 - (iii) Consumer satisfaction survey results; Compensation paid to consumers (aggregate data).
- (g) The information shall be disclosed through:
 - (i) Entity's website (dedicated consumer section);
 - (ii) Mobile application;
 - (iii) Customer service centers and walk-in offices;
 - (iv) Bills and invoices;
 - (v) Offer documents and connection agreements
 - (vi) Prominent display boards at retail outlets, CNG stations, LPG distributorships;
 - (vii) QR codes at CNG stations and retail outlets linking to complaint registration;
 - (viii) Any other medium as specified by the Board.
- (h) The information shall be disclosed in English, Hindi and the local/regional language.
- (i) The entity shall ensure that the information disclosed is accurate, complete, and updated regularly.

IOCL LPG Inputs for 49:

The LPG rates / safety/ contact / service standards/ do's & don'ts information is already available service standards are already available at IOCL. Hence not required and compensation as mentioned in above points is not desirable.

50. Display requirements at retail outlets and CNG stations

- (a) Every retail outlet and CNG station shall display prominently:
 - (i) Maximum Retail Price or price per kilogram;
 - (ii) Quality certification and testing reports;
 - (iii) Calibration certificate of dispensing equipment with validity;
 - (iv) Customer care helpline number and emergency number;
 - (v) Contact details of Field Officer with escalation matrix;

(i) to (v) IOCL Retail Inputs: Already displayed at ROs. The MDG / Dealership Agreement signed with the dealerships mandates display of all these prominently at ROs. Also, covered under Citizen's Charter.

The proposed regulatory system is already existent in Retail, hence not recommended.

(vi) QR code for instant complaint registration;

IOCL Retail Inputs:

1. **Technology Mandate:** Regulations should be technology neutral.
2. **Digital Divide:** Many retail outlets serve customers without smartphones or digital literacy. Mandating QR-based systems may exclude the most vulnerable consumers.
3. **Better Alternatives Already Exist:**
 - Toll-free helplines already operational
 - SMS-based complaint registration available
 - QR based Darpan APP is already mandated and is available for Customer Feedback at Retail Outlets.
 - Email/online portals functional
 - Physical complaint books present

Better alternatives exist, so proposed regulatory not recommended for Retail.

(vii) Consumer rights board;

IOCL Retail Inputs:

The MDG / Citizen's Charter/ Dealership Agreement signed with the dealerships mandate display of all these prominently at ROs. **The proposed regulatory system is already existent in Retail, hence not recommended.**

(viii) Safety instructions in pictorial format.

IOCL Retail Inputs:

The MDG / Citizen's Charter/ Dealership Agreement signed with the dealerships mandate display of all these prominently at ROs. **The proposed regulatory system is already existent in Retail, hence not recommended.**

(b) The display shall be in English, Hindi and the local/regional language.

IOCL Retail Inputs:

The MDG / Citizen's Charter/ Dealership Agreement signed with the dealerships mandate display of all these prominently at ROs. **The proposed regulatory system is already existent in Retail, hence not recommended.**

- (c) The display shall be clearly visible and legible to consumers at eye level.
- (d) Availability of complaint/suggestion book shall be prominently indicated.

IOCL Retail Inputs:

The MDG / Citizen's Charter/ Dealership Agreement signed with the dealerships mandate display of all these prominently at ROs. **The proposed regulatory system is already existent in Retail, hence not recommended.**

51. Billing transparency

- (a) Every entity shall provide detailed DPNG bills to consumers showing:
 - (i) Consumer details: Account Number, Name, Address, Phone number;
 - (ii) Consumption details: consumer category, consumption details, date of reading (old, new and next due on;
 - (iii) The sale price charged for supply of gas, penalty chargeable for payment after due date and total dues payable;
 - (iv) Average consumption in the last six months, excess payments made by consumer, if any, other charges if any, collected by the entity from the consumer during the billing cycle etc;
 - (v) Address, Telephone numbers of Bill Collection Centre along with their timings; Name, designation and contact details of Incharge-Complaint Receiving Cell, Nodal Officer (Regional/ Zonal) and Appellate Authority (not below the rank of GM or equivalent) for dealing with consumer complaints.
 - (vi) ~~Contact Details of Ombudsman~~; Link to PNGRB IGMS portal for escalation.
 - (vii) Price Break up of Retail Selling Price including Cost of Natural Gas to CGD entity, Supply & Distribution Cost, Entity's Margin, VAT applicable, any other tax, if applicable. The bills should mention Retail price in both Rs. /MMBTU and in Rs. /SCM.
 - (viii) Security Deposit against the connection
 - (ix) Online payment options covering details of UPI, Credit card, Auto payment, QR codes for payment etc. indicated on the bill.
 - (x) Meter reading photos on the PNG bill (for non- smart meters)
 - (xi) Important notice column/ box, highlighting relevant information.
 - (xii) Link/ QR code to PNGRB Consumer Protection Regulation, PNGRB QOS Regulation, Consumer Education Material.
 - (xiii) Toll free 24*7 Emergency number with prominent display on bill and customer care number (along with Operating hours)
 - (xiv) Bills shall be issued on a bi-monthly basis for PNG consumers or as specified by the

Board.

- (b) Bills shall be delivered at least 15 days before the due date.
- (c) Consumers shall have online access to current and previous bills through website and mobile app.
- (d) The entity shall provide detailed consumption history for the past 12 months on request.
- (e) The authorized entity shall disclose the applicable PNG retail selling price for all consumer categories in ₹/MMBTU for invoicing purposes. For consumer convenience and better comprehension, the equivalent price in ₹/SCM may also be displayed.

IOCL LPG Inputs for 51:

The LPG cylinder is billed per cylinder and payment is collected immediately; the billing details are controlled centrally hence the system is totally transparent . Details of security deposit are already displayed at showroom, hence this point is not required.

52. Annual disclosure to the Board

- (a) Every entity shall submit an annual report to the Board by 30th April every year for the previous financial year in the format specified in Schedule D disclosing:
 - (i) Number of consumers category-wise as on 31st March;
 - (ii) New connections/consumers added during the year;
 - (iii) Disconnections made during the year;
 - (iv) Supply interruption statistics (planned and unplanned);
 - (v) Complaint statistics: registered, resolved, pending, category-wise;
 - (vi) Complaint resolution performance against TAT;
 - (vii) Complaints escalated to PNGRB IGMS Portal / Ombudsman;
 - (viii) Quality of service performance against standards;
 - (ix) Consumer satisfaction survey results;
 - (x) Compensation paid to consumers with category-wise breakup;
 - (xi) Consumer awareness programmes conducted;
 - (xii) Penalties imposed by the Board;
 - (xiii) Any other information as prescribed by the Board.

- (b) The Board may publish aggregated information from annual reports of entities on its website for public information.

IOCL LPG Inputs 52:

IOCL has a set system of grievance redressal with proper escalation matrix and system of compensation for LPG accidents and property damage due to LPG accidents. Hence in our opinion, the regulations will only lead to duplication of the exercise.

The draft regulations envisage imposition of penalties which would be over and above the relief which may be granted by the Consumer Forum under the Statutory Provisions of Consumer Protection Act, thereby resulting in duplication of action against the entity.

CHAPTER XI: CONSUMER AWARENESS AND EDUCATION

53. Obligation to conduct consumer awareness programmes.

- (a) Every entity shall conduct consumer awareness and education programmes throughout the year to educate consumers about their rights, obligations, safety practices, and grievance redressal mechanisms.
- (b) The consumer awareness programmes shall focus on:
 - (i) Rights and obligations of consumers under these regulations;
 - (ii) Safe use of petroleum, petroleum products and natural gas;
 - (iii) Conservation and judicious use of energy resources;
 - (iv) Grievance redressal mechanism and escalation process;
 - (v) Quality standards and how to identify sub-standard products;
 - (vi) Prevention of adulteration and theft;
 - (vii) Emergency procedures and safety protocols;
 - (viii) Environmental benefits of clean fuels;
 - (ix) Digital platforms for complaint registration and bill payment;
 - (x) Consumer responsibilities for safe usage;
 - (xi) Any other relevant topic
- (c) The consumer awareness programmes may be conducted through
 - (i) Workshops and seminars for consumer groups, RWAs, and commercial/industrial users;
 - (ii) Public awareness campaigns and rallies;
 - (iii) Print media (newspapers, magazines, pamphlets, posters);
 - (iv) Electronic media (TV, radio, digital displays);
 - (v) Social media platforms;
 - (vi) Distribution of pamphlets, booklets, and educational material;
 - (vii) Safety demonstrations at CNG stations, retail outlets, and community centres;
 - (viii) School and college programmes for youth education;
 - (ix) Community engagement events;
 - (x) Display of safety posters and visual aids at customer touchpoints;
 - (xi) SMS campaigns and email newsletters;

- (xii) Mobile app notifications;
- (xiii) Website content and FAQ sections;
- (xiv) Customer onboarding education during new connection registration;
- (xv) Any other medium.

54. Consumer awareness campaigns

- (a) The Board may, from time to time, launch national consumer awareness campaigns on specific themes such as
 - (i) Safety week or safety fortnight;
 - (ii) Energy conservation campaigns;
 - (iii) Consumer rights awareness;
 - (iv) Clean fuel adoption drives;
 - (v) Digital literacy for online services.
- (b) All entities shall participate in and actively support national consumer awareness campaigns launched by the Board.
- (c) The Board may collaborate with Ministry of Petroleum and Natural Gas, State Governments, educational institutions, NGOs, VCOs and other stakeholders for consumer awareness campaigns.

55. Consumer education material

- (a) The Board shall develop standard consumer education material on various topics related to petroleum, petroleum products and natural gas including:
 - (i) Consumer rights and obligations charter;
 - (ii) Safety guidelines and dos & don'ts;
 - (iii) Grievance redressal process flowcharts;
 - (iv) Emergency response procedures;
 - (v) Energy conservation tips;
 - (vi) FAQ documents.
- (b) Entities shall use and disseminate the consumer education material developed by the Board at all customer touchpoints.
- (c) Entities may develop additional consumer education material in consultation with the Board tailored to local contexts.
- (d) All consumer education material shall be available in English, Hindi and local/regional languages and shall use simple language and pictorial representations for easy understanding.

- (e) Consumer education material shall be made available on entity's website for free download.

56. Budget for consumer awareness –

- (a) Every entity shall allocate adequate budget for consumer awareness and education programmes.
- (b) The entity shall spend at least 0.1% of its annual profit (after tax) or such percentage as may be specified by the Board, on consumer awareness and education programmes.
- (c) The entity shall submit an annual statement of expenditure on consumer awareness and education programmes to the Board including details of activities conducted, reach achieved, and impact assessment.
- (d) The Board may recognize and reward entities demonstrating exemplary performance in consumer awareness and education.

IOCL LPG Inputs from 53-56:

IOCL is already carrying out such activities through

- a. Safety Clinics/ LPG Panchayats/ Conservation campaigns
- b. Special safety drives
- c. Safety days

LPG is a highly subsidized essential commodity and it's a huge under recovery to the exchequer, the provisions mentioned in the clause will only put additional burden on the exchequer.

Relating to annual profit is not suggested as there may be times when the profit is negative.

Additional budget is to be compensated to IOCL

IOCL Retail Inputs:

1. IOC is already conducting extensive awareness:

- Road safety campaigns
- Fuel conservation campaigns (Saksham Campaign)
- Safe driving workshops
- School education programs
- These are conducted voluntarily and for brand building.

2. Retail outlet dealers are franchisees:

- Most dealers don't have "annual profit" in a corporate sense.
- They operate on thin margins.
- Mandating 0.1% spending on awareness programs is unrealistic for a single outlet.

3. Information overload at outlets:

- Outlets already display: price boards, safety signs, no-smoking signs, fire extinguisher locations, emergency numbers, payment options, promotional materials
- Adding "consumer rights boards" and "grievance escalation charts" creates visual clutter.
- Customers at petrol pumps want quick service, not to read regulatory notices.

The proposed regulatory system is not recommended for Retail.

IOCL CGD Inputs

Clauses to be removed.

CHAPTER XII: CONSUMER SATISFACTION SURVEY

57. Obligation to conduct consumer satisfaction survey.

- (a) Every entity shall conduct a consumer satisfaction survey every year to assess the satisfaction level of consumers regarding services provided by the entity.
- (b) The consumer satisfaction survey shall be conducted through an independent third- party agency empanelled by the Board.

IOCL CGD Inputs

Clauses to be removed. Justification same as Clause 15.i

- (c) The Board may, at its discretion, conduct consumer satisfaction surveys across entities or in specific geographical areas directly or through empanelled agencies.

58. Framework for consumer satisfaction survey

- (a) The framework, methodology, parameters and other details for consumer satisfaction survey shall be as specified by the Board from time to time.
- (b) The consumer satisfaction survey shall cover parameters including but not limited to:
 - (i) Availability and reliability of supply;
 - (ii) Quality of supply (product quality, pressure, etc.);
 - (iii) Billing accuracy and transparency;
 - (iv) Customer service responsiveness;
 - (v) Complaint handling efficiency;
 - (vi) Safety and security;
 - (vii) Value for money;
 - (viii) Staff behaviour and professionalism;
 - (ix) Ease of access to services (digital and physical);
 - (x) Overall satisfaction with entity.
- (c) The survey shall use a combination of quantitative rating scales and qualitative feedback questions.
- (d) The survey shall be consumer-centric and designed to capture genuine feedback.

59. Conduct of ~~consumer satisfaction survey~~

- (a) The entity shall engage an empaneled third-party agency for conducting the consumer satisfaction survey to ensure objectivity and credibility.
- (b) The survey shall be conducted annually covering a representative sample of consumers across all categories (domestic, commercial, industrial, CNG, LPG, retail outlet

consumers).

- (c) The survey methodology shall include:
 - (i) Structured questionnaire covering all parameters;
 - (ii) Personal interviews (face-to-face or telephonic);
 - (iii) Online surveys through email or web portal;
 - (iv) Focus group discussions for in-depth insights;
 - (v) Any other scientific method approved by the Board.
- (d) The sample size and sampling methodology shall be as specified by the Board to ensure statistical validity.
- (e) The survey shall be conducted in a transparent and unbiased manner without any influence from the entity.
- (f) The third-party agency shall directly interact with consumers and shall not route communication through the entity.

IOCL CGD Inputs	Justification
Section to be removed	Periodic third-party surveys add limited incremental value when real-time consumer feedback is continuously captured and acted upon.

60. Reporting of consumer satisfaction survey

- (a) The third-party agency shall submit a detailed report of the consumer satisfaction survey to the entity and the Board simultaneously.
- (b) The report shall include:
 - (i) Survey methodology and sample details;
 - (ii) Parameter-wise findings with scores;
 - (iii) Category-wise and geography-wise analysis;
 - (iv) Overall satisfaction score (composite index);
 - (v) Strengths and areas of good performance;
 - (vi) Weaknesses and areas requiring improvement;
 - (vii) Verbatim consumer feedback and suggestions;
 - (viii) Benchmarking with previous year (year-on-year comparison);
 - (ix) Recommendations for improvement.
- (c) The entity shall submit the consumer satisfaction survey report to the Board by 30th September of every year.
- (d) Any Exception to the timeline mentioned in regulation (c) for submission of report will be done with prior approval of the board.

- (e) The Board shall publish the consumer satisfaction survey results on its website for public information, including:
 - (i) Entity-wise overall satisfaction scores;
 - (ii) Parameter-wise performance;
 - (iii) Rankings of entities (if applicable);
 - (iv) Best practices observed.

61. Action on consumer satisfaction survey findings

- (a) The entity shall carefully analyse the consumer satisfaction survey findings and identify areas requiring improvement.
- (b) The entity shall prepare a detailed action plan to address areas of concern with specific improvement targets and timelines.
- (c) The action plan shall be submitted to the Board within 60 days of submission of the survey report.
- (d) The action plan shall include:
 - (i) Issues identified from the survey;
 - (ii) Root cause analysis;
 - (iii) Proposed corrective and preventive actions;
 - (iv) Responsibility assignment (officer-wise);
 - (v) Timeline for implementation;
 - (vi) Resource requirements;
 - (vii) Expected outcomes and improvement targets
- (e) The Board may direct the entity to take specific actions based on the survey findings, including:
 - (i) Infrastructure improvements;
 - (ii) Process changes;
 - (iii) Staff training and capacity building;
 - (iv) Technology upgrades;
 - (v) Increase in customer touchpoints;
 - (vi) Any other action.
- (f) The entity shall monitor implementation of the action plan and submit quarterly progress reports to the Board.
- (g) The Board may conduct follow-up inspections or audits to verify implementation of action plans.
- (h) Consumer satisfaction survey results may be used by the Board for:
 - (i) Performance evaluation of entities;
 - (ii) Benchmarking and setting standards;
 - (iii) Recognition and rewards;
 - (iv) Enforcement actions in case of poor performance;
 - (v) Policy formulation and regulatory interventions

IOCL LPG Inputs 57 to 61:

The customers are serviced by the distributor and service level performance is evaluated at LPG distributor level.

Feedback mechanism by way of sending SMS on every refill supplies is already available hence survey through independent third party or through board is not suggested

CHAPTER XIII: EMPANELMENT OF VCOs AND NGOs

62. Empanelment of VCOs and NGOs

IOCL CGD Inputs	Justification
Chapter to be removed	Empanelment of NGOs/VCOs creates an additional interface between consumers and CGD entities. Involvement of external bodies will increase administrative complexity and compliance burden without proportionate improvement in consumer protection or service outcomes.

- (a) The Board has issued notice and scheme for empanelment of Voluntary Consumer Organizations (VCOs) and Non-Governmental Organizations (NGOs) for consumer protection and awareness activities.
- (b) The Board shall empanel VCOs and NGOs meeting the eligibility criteria specified in the scheme document issued by the Board.
- (c) The empanelled VCOs and NGOs shall work in collaboration with the Board and entities for strengthening consumer protection and awareness in the oil and gas sector.

63. Eligibility criteria for empanelment

- (a) A VCO or NGO shall be eligible for empanelment if it:
 - (i) Is registered under the Societies Registration Act, 1860 or the Indian Trusts Act, 1882 or Section 8 of the Companies Act, 2013;
 - (ii) Has been in existence for at least three years;
 - (iii) Has experience in consumer protection, consumer awareness, or related activities;
 - (iv) Has adequate infrastructure, manpower and resources;
 - (v) Has a clean track record and is not blacklisted by any government agency;
 - (vi) Meets such other criteria as may be specified by the Board in the scheme document.
- (b) The VCO or NGO shall not have any direct or indirect commercial interest in entities engaged in petroleum, petroleum products or natural gas sector.
- (c) The VCO or NGO shall demonstrate financial transparency and submit audited accounts.

64. Process for empanelment

- (a) The Board shall invite applications from VCOs and NGOs for empanelment through a public notice on its website
- (b) Applications shall be submitted online or in physical format as prescribed by the Board along with supporting documents including:
 - (i) Registration certificate;
 - (ii) Memorandum of Association and Bye-laws;
 - (iii) Audited financial statements for last 3 years;
 - (iv) Details of past activities in consumer protection/awareness;
 - (v) Details of infrastructure and manpower;

- (vi) Any other document as specified.
- (c) The Board shall scrutinize the applications and shortlist eligible VCOs and NGOs.
- (d) The Board may conduct interviews, presentations, or site visits as part of the empanelment process.
- (e) The Board shall empanel VCOs and NGOs for a period of three years, which may be renewed based on performance.
- (f) The list of empanelled VCOs and NGOs shall be published on the Board's website with contact details.

65. Roles and responsibilities of empanelled VCOs and NGOs

The empanelled VCOs and NGOs shall:

- (a) Assist consumers in understanding their rights and obligations;
- (b) Assist consumers in filing complaints and navigating the grievance redressal mechanism;
- (c) Represent consumers in proceedings before Consumer Complaint Cells, Ombudsman or the Board (with proper authorization);
- (d) Conduct consumer awareness and education programmes in collaboration with entities and the Board;
- (e) Participate in consumer satisfaction surveys and provide independent feedback;
- (f) File public interest complaints on behalf of groups of consumers or in larger public interest;
- (g) Provide feedback to the Board on consumer issues, systemic problems, and policy gaps;
- (h) If and when required, collaborate with the Board in policy formulation and regulatory impact assessment;
- (i) Organize consumer forums, workshops, and seminars;
- (j) Disseminate information about consumer rights and grievance redressal mechanisms;
- (k) Undertake any other activity as assigned by the Board for consumer protection.

66. Support to empanelled VCOs and NGOs

- (a) The Board may provide financial support to empaneled VCOs and NGOs for conducting consumer awareness and education programmes based on proposals submitted.
- (b) The Board may provide training to representatives of empaneled VCOs and NGOs on:
 - (i) Oil and gas sector regulations;
 - (ii) Consumer rights and obligations;
 - (iii) Grievance redressal mechanisms;
 - (iv) Technical aspects of petroleum products and natural gas;
 - (v) Safety protocols.
- (c) The Board may facilitate collaboration between empanelled VCOs/NGOs and entities for joint awareness programmes.
- (d) The Board shall provide access to data, information, and regulatory documents to empanelled VCOs and NGOs for their work (subject to confidentiality provisions).
- (e) The Board may organize periodic meetings with empanelled VCOs and NGOs for

sharing experiences and best practices.

67. Monitoring and review

- (a) The Board shall monitor the performance of empaneled VCOs and NGOs based on:
 - (i) Number of consumers assisted;
 - (ii) Awareness programmes conducted;
 - (iii) Complaints filed and their outcomes;
 - (iv) Quality of work and impact created;
 - (v) Financial accountability and reporting.
- (b) Empaneled VCOs and NGOs shall submit annual reports to the Board detailing their activities, reach, financial utilization, and impact.
- (c) The Board may conduct periodic reviews, inspections, or audits of empaneled VCOs and NGOs.
- (d) The Board may de-empanel a VCO or NGO for:
 - (i) Non-performance or poor performance;
 - (ii) Violation of terms of empanelment;
 - (iii) Financial irregularities or misuse of funds;
 - (iv) Conflict of interest;
 - (v) Any other misconduct.
- (e) The Board shall provide an opportunity of hearing before de-empanelment

IOCL LPG Inputs 62 to 67:

IOCL has evolved its system over last six decades to service its 16 crore customers. There is no necessity for developing VCO/ NGO system which will create a redundant parallel system and may result in delay in service to the customer.

CHAPTER XIV: OMBUDSMAN

68. Appointment and functions of Ombudsman

- (a) The detailed provisions relating to appointment, qualifications, functions, powers, procedures, and all other matters concerning the Ombudsman are specified in the separate Ombudsman Regulations framed by the Board.
- (b) The Ombudsman provisions as specified in this Chapter shall be read in conjunction with the detailed Ombudsman Regulations.

IOCL LPG Inputs 68:

LPG is an essential commodity product, the price and the commission is controlled by MOPNG.

IOCL has a set system of grievance redressal with proper escalation matrix and system of compensation for LPG accidents and property damage due to LPG accidents. Hence in our opinion, provision of Ombudsman will only lead to duplication of the exercise. The same is already been communicated in various forums.

IOCL CGD Inputs

Ombudsman Chapter to be removed

Justification

As the CGD consumers are covered under general consumer protection rules, an Ombudsman is not required for the sector. Complaint to the Ombudsman will add too much of compliance burden on the fledgling CGD industry.

IOCL Retail Inputs:

IOCL has a set system of grievance redressal with proper escalation matrix. IOC Customer at the Retail Outlet is having multiple channels to register his grievance covering every aspect of the Services. Hence in our opinion, provision of Ombudsman will only lead to duplication of the exercise. The same is already been communicated in various forums.

CHAPTER XV: ENFORCEMENT AND PENALTIES

69. Monitoring and compliance

- (a) The Board shall monitor compliance of these regulations by entities through:
 - (i) Quarterly and annual reports submitted by entities;
 - (ii) Data from PNGRB IGMS Portal on escalated complaints;
 - (iii) Consumer satisfaction survey results;
 - (iv) Inspections and audits;
 - (v) Consumer feedback and complaints received directly by the Board.
- (b) The Board may conduct inspections, audits and investigations to verify compliance with these regulations.
- (c) Every entity shall facilitate inspections and audits by the Board or its authorized representatives and provide all information and documents as required.
- (d) Every entity shall submit reports and information as required by the Board under these regulations within the specified timelines.

70. Show cause notice

- (a) If the Board is satisfied that an entity has contravened any provision of these regulations, it shall issue a show cause notice to the entity specifying:
 - (i) The provision of regulation alleged to have been contravened;
 - (ii) The nature and particulars of contravention;
 - (iii) The penalty proposed to be imposed;
 - (iv) The time (not less than 15 days) within which representation may be submitted.
- (b) The entity shall submit its written representation within the time specified in the show cause notice.
- (c) The Board shall provide an opportunity of personal hearing to the entity, if requested.
- (d) The Board shall consider the representation, evidence, and submissions made by the entity before passing final orders.

71. Penalty for contravention –

- (a) If, after considering the representation and personal hearing (if any), the Board is satisfied that the entity has contravened the provisions of these regulations, it may impose penalty as specified in this regulation.

IOCL CGD Inputs	Justification
Penalty for contravention to be removed	The CGD sector requires high capital investment and long-term commitment to safety and expansion. Excessive penalties, especially for non-critical issues, strain finances and divert funds from safety and service improvement. A rational, risk-based and graded

	penalty structure would promote compliance, protect consumers, and support sector sustainability. Current penalty levels are disproportionate and need urgent rationalisation to avoid burdening tariffs and undermining infrastructure goals. Penalties should be proportionate, risk-based, and graded.
--	---

(b) For contravention of the following provisions, the Board may impose penalty as specified:

Clause	Nature of Non-Compliance	Prescribed Penalty
(i)	Failure to establish Consumer Complaint Cell as per Regulation 16	Up to ₹10 lakh
(ii)	Failure to resolve complaints within specified TAT	₹1,000 per complaint per day of delay, subject to a maximum of ₹1 lakh per complaint

Clause	Nature of Non-Compliance	Prescribed Penalty
(iii)	Failure to pay compensation to consumers as per Chapter VII	Penalty equal to twice the compensation amount due
(iv)	Non-compliance with quality of service standards under Chapter IX	Up to ₹25 lakh per instance
(v)	Failure to conduct consumer satisfaction survey as per Chapter XII	Up to ₹10 lakh
(vi)	Failure to conduct consumer awareness programmes as per Chapter XI or not spending required percentage of turnover	Up to ₹10 lakh
(vii)	Non-disclosure of information or violation of transparency requirements under Chapter X	Up to ₹10 lakh
(viii)	Supply of sub-standard, adulterated or non-conforming petroleum products or natural gas	₹50 lakh or 1% of annual turnover, whichever is higher
(ix)	Violation of safety standards causing risk to consumers or public	Up to ₹1 crore
(x)	Overcharging consumers or unfair trade practices	Ten times the overcharged amount or ₹25 lakh, whichever is higher
(xi)	Non-implementation of settlement agreement of Ombudsman	Up to ₹25 lakh
(xii)	Failure to respond to complaints escalated on PNGRB IGMS Portal or non-compliance with Board's directions	Up to ₹25 lakh
(xiii)	Failure to submit quarterly/annual reports to the Board	₹5 lakh per delayed report
(xiv)	Obstruction of Board's inspections or audits or non-furnishing of information	Up to ₹10 lakh
(xv)	Any other contravention of provisions of these regulations	Up to ₹1 crore

- (c) In case of continuing contravention, the entity shall be liable to pay additional penalty which may extend to Rs. 1 lakh for every day during which such contravention continues.
- (d) While imposing penalty, the Board shall take into account:
 - (i) The nature, severity and duration of contravention;
 - (ii) The harm caused to consumers and number of consumers affected;
 - (iii) The conduct and cooperation of the entity during proceedings;
 - (iv) Whether the entity is a repeat offender;
 - (v) Any mitigating circumstances or efforts made by entity to rectify;
 - (vi) Economic impact of penalty on entity and sector.

72. Other actions by the Board

In addition to or instead of penalty, the Board may:

- (a) Issue directions to the entity to take corrective measures with specified timelines;
- (b) Direct the entity to pay compensation to affected consumers;
- (c) Direct the entity to submit improvement plan and monitor its implementation;
- (d) Suspend the authorization or registration of the entity for a specified period;
- (e) Initiate proceedings for cancellation of authorization or registration;
- (f) Publish details of contravention and penalty on its website and in newspapers;
- (g) Refer the matter to appropriate law enforcement agencies if criminal liability is involved;
- (h) Take any other action as deemed fit in the interest of consumers and public.

73. Appeals

Any entity aggrieved by an order of the Board imposing penalty or taking any action under these regulations may prefer an appeal to the Appellate Tribunal for Electricity within 30 days from the date of such order in accordance with the provisions of the Act.

74. Recovery of penalty

- (a) The penalty imposed by the Board shall be paid by the entity within 30 days of the order or within such extended time as may be granted by the Board.
- (b) The Board may also recover penalty by:
 - (i) Encashing the performance bond or bank guarantee furnished by the entity;
 - (ii) Adjusting against any amount payable by the Board to the entity;
 - (iii) Any other lawful means

IOCL LPG Inputs 69 to 74:

LPG is an essential commodity product, the price and the commission is controlled by MOPNG

IOCL has principal to principal agreement with its LPG distributors. The customers are serviced by the LPG distributors. The LPG distributors are essentially small businesses and there will be huge resentment in the LPG distributors ultimately affecting the services to the customers.

IOCL is incurring huge under recovery on account of sales of Domestic LPG and the true market price of product is above the cost price to the customer. Any compensation clause is therefore not desirable.

CHAPTER XVI: CONSUMER PROTECTION COMMITTEE AT ENTITY BOARD LEVEL

75. Consumer Protection Committee at Entity Board Level

IOCL CGD Inputs Consumer Protection Committee at Entity Board Level to be completely removed	Justification Consumer issues are largely operational and are best addressed through management-level mechanisms rather than at the Board level. Mandating a separate Board-level committee would add compliance burden without proportionate benefit; therefore, this provision may be dropped. Oil companies already have well-established and independent mechanisms for customer grievance redressal, monitoring, and governance. These systems operate under company rules, SEBI regulations, and public sector governance obligations, with structured oversight and reporting already in place.
--	---

(a) Constitution of Consumer Protection Committee

- (i) Every entity shall constitute a Consumer Protection Committee (hereinafter referred to as "CPC") at its Board of Directors level within ninety (90) days from the date of notification of these Regulations, or as per existing Board structure if such a committee already exists.
- (ii) The CPC shall be a standing committee of the entity's Board of Directors responsible for overseeing the provisions covered in these regulations pertaining to consumer protection matters, grievance redressal mechanisms, service quality standards, and consumer satisfaction.
- (iii) The composition of the CPC shall be as follows:
 - a. Chairman: A senior Board-level member designated by the entity's Board
 - b. Members: Minimum three (3) and maximum five (5) members comprising:
 - At least one independent/non-executive Director
 - Head of Consumer Protection/Complaint Cell or Principal Nodal Officer
 - Chief Financial Officer or equivalent
 - One external member (optional): Consumer representative, NGO representative, or independent expert in consumer protection
- (iv) The entity shall notify the composition of the CPC to the Board within the timeline

specified in Regulation (a)(1), with details of designation, contact information, and tenure of each member.

(b) Functions and Responsibilities:

The Consumer Protection Committee shall be responsible for:

(i) Policy and Strategy:

- a. Formulating entity-wide consumer protection policies and strategies
- b. Ensuring alignment with these Regulations and PNGRB directions
- c. Reviewing and approving consumer protection programs
- d. Setting service quality and consumer satisfaction targets
- e. Recommending improvements in consumer service delivery

(ii) Oversight of Grievance Redressal:

- a. Monitoring the performance of Consumer Complaint Cell and grievance redressal mechanism
- b. Reviewing trends in consumer complaints and systemic issues
- c. Ensuring compliance with Turnaround Time (TAT) norms prescribed in Schedule B
- d. Identifying root causes of repeated complaints
- e. Approving escalation and exception handling protocols

(iii) Quality of Service and Performance:

- a. Reviewing entity's performance against Quality-of-Service Standards (Schedule A)
- b. Analysing consumer satisfaction survey results
- c. Approving action plans based on survey feedback
- d. Setting targets for improvement and tracking progress
- e. Benchmarking performance against peer entities (where data available)

(iv) Compensation and Liability:

- a. Reviewing compensation paid to consumers for service failures
- b. Approving compensation policies and amount calculations
- c. Monitoring Consumer Protection Fund contributions
- d. Reviewing claims and ensuring timely payment to consumers
- e. Analysing patterns in compensation to identify systemic improvements needed

(v) Consumer Awareness and Education:

- a. Approving annual consumer awareness and education programs
- b. Allocating budget for consumer awareness activities (minimum 0.1% of profit after tax)
- c. Reviewing effectiveness of awareness initiatives
- d. Ensuring safety messaging and consumer education reach all consumer segments
- e. Coordinating with NGOs, VCOs, and civil society for awareness activities

(vi) Transparency and Disclosure:

- a. Ensuring compliance with information disclosure requirements (Chapter X)
- b. Reviewing pricing transparency and price breakup disclosures
- c. Approving annual disclosure reports to the Board

- d. Ensuring consumer-accessible display of rights, obligations, and escalation details
- e. Monitoring website and portal information accuracy

(vii) Regulatory Compliance:

- a. Ensuring entity's compliance with all provisions of these Regulations
- b. Reviewing Board directives and guidelines and ensuring implementation
- c. Monitoring penalties and enforcement actions
- d. Preparing response to Board queries and regulatory requests
- e. Coordinating with Principal Nodal Officer on regulatory matters

(viii) Internal Controls and Audit:

- a. Reviewing internal audit findings related to consumer protection
- b. Ensuring adequate infrastructure and resources for Consumer Complaint Cell
- c. Monitoring CRM system functionality and data integrity
- d. Reviewing complaint handling procedures for compliance and effectiveness
- e. Recommending process improvements and system upgrades

(ix) Stakeholder Engagement:

- a. Reviewing feedback from consumer groups, NGOs, and civil society
- b. Addressing concerns raised by consumer advocates
- c. Coordinating with State Governments on consumer protection matters
- d. Engaging with peer entities for best practice sharing
- e. Facilitating interaction between Board and consumers (via appropriate channels)

(x) Board Reporting:

- a. Submitting quarterly reports to the entity's Board of Directors on consumer protection metrics
- b. Presenting annual consumer protection performance review
- c. Recommending Board-level decisions on consumer policy matters
- d. Escalating critical consumer issues requiring Board attention
- e. Providing updates on regulatory compliance and pending enforcement actions

(c) Meetings and Procedures

- (i) The CPC shall meet at least once every quarter (four times per calendar year) to review consumer protection performance and approve necessary actions.
- (ii) Additional meetings may be convened by the Chairman on an ad-hoc basis to address urgent consumer protection matters, regulatory directives, or significant complaints.
- (iii) Quorum: A minimum of three (3) members (including the Chairman or his authorized representative) shall constitute the quorum for CPC meetings.
- (iv) The CPC shall maintain minutes of all meetings, documenting decisions, action items, responsible persons, and timelines for implementation.
- (v) Minutes shall be submitted to the entity's Board of Directors within seven (7) days of the meeting.
- (vi) The CPC may seek reports, data, and presentations from: Consumer Complaint Cell / Principal Nodal Officer
 - a. Operations and Service Delivery teams

- b. Finance and Compliance functions
- c. Third-party agencies conducting consumer satisfaction surveys
- d. External experts as necessary

(d) Powers and Authority:

- (i) The CPC is empowered to:
 - a. Direct the Principal Nodal Officer to take specific actions for consumer grievance resolution, service quality improvement, or regulatory compliance
 - b. Approve compensation policies for consumer service failures within the entity's financial authorization limits
 - c. Recommend policy changes to the entity's Board on consumer-related matters
 - d. Require reports from any department or function on consumer protection-related matters
 - e. Mandate investigations into systemic issues, repeated complaints, or serious grievances
 - f. Approve budget allocations for consumer awareness and satisfaction surveys (within Board-approved budgets)
 - g. Direct implementation of Board directives and PNGRB guidelines on consumer protection
 - h. Approve escalation protocols for urgent or complex consumer grievances
- (ii) The CPC may recommend to the entity's Board:
 - a. Policy changes requiring Board approval
 - b. Significant budget allocations beyond CPC authority
 - c. Organizational changes in consumer protection function
 - d. Engagement of external experts or agencies
 - e. Participation in sector-wide consumer protection initiatives

(e) Accountability and Performance Review

- (i) The CPC shall be accountable to the entity's Board of Directors for:
 - a. Implementation of consumer protection policies and strategies
 - b. Compliance with these Regulations and PNGRB directives
 - c. Performance against agreed service quality and satisfaction targets
 - d. Timely resolution of consumer grievances
 - e. Transparency and disclosure compliance
 - f. Regulatory compliance and avoidance of penalties
- (ii) The entity's Board of Directors shall conduct an annual performance review of the CPC, assessing:
 - a. Achievement of consumer protection objectives
 - b. Improvement in Quality of Service metrics
 - c. Consumer satisfaction survey results
 - d. Reduction in complaint escalations and regulatory actions
 - e. Effectiveness of consumer awareness programs
 - f. Compliance with regulatory requirements
- (iii) Based on the performance review, the Board may:
 - a. Commend exemplary performance and approve enhanced responsibilities

- b. Direct remedial actions for identified gaps
- c. Modify CPC composition if performance is inadequate
- d. Set revised targets and objectives for the succeeding year

(f) Reporting to PNGRB

- (i) The entity's Principal Nodal Officer shall submit a quarterly summary of CPC activities and consumer protection performance to the Board as part of regular complaint handling reports (Schedule C).
- (ii) The summary shall include:
 - a. CPC meeting dates, decisions, and action items
 - b. Consumer protection performance metrics and trends
 - c. Significant complaints and systemic issues addressed
 - d. Compensation paid and consumer satisfaction levels
 - e. Regulatory compliance status
 - f. Critical issues requiring Board intervention
- (iii) The entity shall disclose the composition and charter of the CPC on its website and in annual reports for transparency.

(g) Relationship with Principal Nodal Officer and Consumer Complaint Cell

- (i) The Principal Nodal Officer shall work under the oversight of the CPC and shall:
 - a. Report regularly on operational matters to the CPC
 - b. Implement decisions and directives issued by the CPC
 - c. Escalate critical consumer protection matters to the CPC for guidance
 - d. Provide data and analysis for CPC deliberations
- (ii) The Consumer Complaint Cell remains operationally independent for day-to-day grievance handling but shall:
 - a. Report performance metrics to the CPC quarterly
 - b. Implement process improvements directed by the CPC
 - c. Participate in CPC meetings as required
- (iii) The CPC shall not interfere with the day-to-day operational functioning of the Consumer Complaint Cell or grievance redressal but shall focus on strategic oversight and performance monitoring.

(h) External Representation (Optional)

- (i) Entities may co-opt an external member to the CPC, such as:
 - a. A consumer advocate or representative of a registered consumer organization
 - b. An independent expert in consumer protection or service quality
 - c. A representative from an NGO/VCO empanelled by the Board
- (ii) The external member shall have observer status or limited voting rights as determined by the entity's Board.
- (iii) The external member shall sign a confidentiality agreement and shall not disclose sensitive commercial information obtained through CPC participation.

(i) Transition and Implementation Timeline

- (i) Entities shall constitute the CPC within ninety (90) days from the date of notification of these Regulations.
- (ii) Entities with existing consumer protection committees may designate their current committee as the CPC under these Regulations, provided the composition and

functions align with this Regulation.

- (iii) For the first quarter of CPC operation, entities may hold an extended meeting to establish procedures, review baseline metrics, and set targets.
- (iv) The Board may issue guidelines detailing best practices for CPC functioning, meeting procedures, and performance metrics.

(j) Compliance and Oversight

- (i) The Board may review the functioning of entity CPCs as part of regular regulatory oversight and audits.
- (ii) Entities shall provide information on CPC meetings, decisions, and performance upon request by the Board.
- (iii) Failure to constitute or maintain an effective CPC, or non-implementation of CPC decisions, shall be treated as non-compliance with these Regulations and attract penalties as specified in Chapter XV.

IOCL Law Inputs for point no 75:

Draft Regulation vis a vis provisions of the Companies Act

In addition to the above, certain discrepancies have been observed in the draft like definition of 'Entity' which includes OMC's, Dealer, Distributors etc. The term Entity is used at various places in the draft Regulations which provides Onerous compliance requirements for Entity, which is not practicable for the constituents like RO Dealer, LPG Distributor etc. as mentioned in the definition.

The Clause 75 under Chapter XVI provides for formation of 'Consumer Protection Committee' by the entities, which should comprise of atleast 1 Independent Director, which may not be feasible for entities which are not corporate entities. Even for Corporate Entities like OMCs creation of one more committee is Onerous activity (in addition to various statutory committees prescribed under Companies Act and SEBI Regulations) to ensure compliance with draft regulations which provide Terms of Reference for the Committee as under: -

- At least 1 meeting every quarter.
- Attendance of Chairman or his representative (The Board / Committee meetings cannot be attended by the representatives of Committee members as per applicable provision of the Companies Act. In other words, meetings are not attended by Proxies).
- Submission of minutes of the meetings of the Committee to the Board within 7 days of the meeting is practically impossible as there may not be a Board Meetings scheduled in next 7 days.
- Accountability and Performance Review – The provisions related to performance review are Exempt for Government Companies under the provisions of the Companies Act and therefore no such system has been developed by IndianOil.
- Moreover considering that the OMCs may be receiving several thousand of consumer complaints, it may not be possible for Board Level Committee to look into such complaints as well as redressal mechanism and status.

In view thereof, the requirement of creating another Board Level Committee is not desirable for looking into Consumer Complaints Redressal.

Imposition of fines and Penalties

The draft regulations envisage imposition of penalties which would be over and above the relief which may be granted by the Consumer Forum under the Statutory Provisions of Consumer Protection Act, thereby resulting in duplication of action against the entity.

IOCL Retail Inputs:

The draft regulations mandate the creation of a 'Consumer Protection Committee' by entities, comprising at least one Independent Director, which may not be feasible. Even for corporate entities such as IOC, the creation of an additional committee represents an onerous activity (in addition to various statutory committees prescribed under the Companies Act and SEBI Regulations) to ensure compliance with the draft regulations, which provide the following Terms of Reference for the Committee:

- At least one meeting every quarter.
- Attendance of the Chairman or their representative (Board/Committee meetings cannot be attended by representatives of Committee members as per applicable provisions of the Companies Act. In other words, meetings cannot be attended by proxy).
- Submission of minutes of Committee meetings to the Board within seven days of the meeting is practically unachievable, as a Board Meeting may not be scheduled within the subsequent seven days.
- Accountability and Performance Review – Government Companies are exempt from provisions related to performance review under the Companies Act; consequently, no such system has been developed.
- Furthermore, considering that IOC may receive several thousand consumer complaints, it may not be feasible for a Board-level Committee to oversee such complaints, their redressal mechanism, and status.

In view of the above, the requirement to create another Board-level Committee for Consumer Complaints Redressal is not desirable.

Hence, the proposed regulation is not recommended for Retail.

CHAPTER XVII: MISCELLANEOUS

76. Coordination with other authorities

- (a) The Board may coordinate with other authorities and organizations for effective implementation of these regulations including:
 - (i) Ministry of Petroleum and Natural Gas;
 - (ii) State Governments and UT administrations;
 - (iii) Petroleum and Explosives Safety Organisation (PESO);
 - (iv) Bureau of Indian Standards (BIS);
 - (v) Consumer forums and commissions under Consumer Protection Act, 2019;
 - (vi) Department of Consumer Affairs;
 - (vii) CPGRAMS, PGMS, INGRAM portals;
 - (viii) Any other authority, department or organization
- (b) The Board may share information, data and reports with other authorities for enforcement of these regulations and related laws, subject to confidentiality provisions.
- (c) The Board may enter into memoranda of understanding (MoUs) with other regulatory bodies or organizations for:
 - (i) Sharing best practices;
 - (ii) Capacity building and training;
 - (iii) Joint consumer awareness initiatives;
 - (iv) Collaborative research and studies.

77. Power to issue guidelines and directions

- (a) The Board may issue guidelines, directions, and clarifications for effective implementation of these regulations on any matter covered under these regulations.
- (b) The Board may issue guidelines on:
 - (i) Best practices in consumer service;
 - (ii) Standardization of procedures and processes;
 - (iii) Use of technology and digital platforms for consumer service;
 - (iv) Complaint categorization and handling;
 - (v) Compensation determination methodology;
 - (vi) Consumer satisfaction survey methodology;
 - (vii) Any other matter.
- (c) All entities shall comply with the guidelines and directions issued by the Board.
- (d) Guidelines and directions issued by the Board shall be published on the Board's website.

78. Power to relax

The Board may, for reasons to be recorded in writing, relax any provision of these regulations (except provisions relating to consumer rights) in exceptional circumstances on a case-by-case

basis, if the Board is satisfied that:

- (a) Strict enforcement of the provision would cause undue hardship to the entity or consumers;
- (b) The relaxation is in the larger public interest or consumer interest;
- (c) There are compelling reasons or force majeure circumstances justifying relaxation.

79. Removal of difficulties

- (a) If any difficulty arises in giving effect to the provisions of these regulations, the Board may, by general or special order, do anything not inconsistent with the provisions of the Act or these regulations, which appears necessary or expedient for the purpose of removing the difficulty.

80. Savings

Nothing in these regulations shall:

- (a) Affect the rights of consumers under the Consumer Protection Act, 2019 or any other law for the protection of consumers for the time being in force;
- (b) Affect the jurisdiction of any court, tribunal, or forum;
- (c) Prevent consumers from pursuing any other remedy available under any law;
- (d) Apply to matters pending before any court, tribunal or consumer forum as on the date of coming into force of these regulations, unless specifically invoked by the parties.

81. Overriding effect

In case of any inconsistency between the provisions of these regulations and any other regulation made by the Board, the provisions of these regulations shall prevail to the extent of such inconsistency.

IOCL LPG Inputs 76 to 81:

IOCL has well defined complaint redressal mechanism with escalation.

**We have already expressed our reservation on creation of Ombudsman.
Legal recourse is already available to the customer.**

Hence separate regulations are not required.

SCHEDULES

SCHEDULE A: QUALITY OF SERVICE STANDARDS

1. Connection Related Standards (PNG)

IOCL CGD Inputs

To be reviewed in line with above

Sr. No.	Parameter	Standard/Timeline	Compensation for Non-Compliance
(i)	Acknowledgment of PNG connection application	Within 24 hours	Rs. 500
(ii)	Issuance of demand note for PNG connection	Within 7 working days	Rs. 100 per day of delay
(iii)	Providing PNG domestic connection after payment	Within 30 days	Rs. 100 per day of delay, max Rs. 5,000
(iv)	Providing PNG commercial connection after payment	Within 45 days	Rs. 200 per day of delay, max Rs. 10,000
(v)	Providing PNG industrial connection after payment	As per SLA or 60 days	As per SLA or Rs. 500 per day, max Rs. 20,000
(vi)	Processing disconnection request	Within 7 working days	Rs. 500
(vii)	Refund of security deposit after disconnection	Within 60 days	Interest at SBI PLR + Rs. 500

2. Supply Related Standards (PNG)

Sr. No.	Parameter	Standard/Timeline	Compensation for Non-Compliance
(i)	Gas pressure (PNG)	As per technical standards and authorization	Rs. 500 per instance (domestic), Rs. 2,000 (commercial), Rs. 10,000 or actual loss (industrial)
(ii)	Gas quality - Calorific value	As per technical standards	Rs. 500 per instance (domestic), Rs. 2,000 (commercial), Rs. 10,000 or actual loss (industrial)
(iii)	Advance intimation for	At least 48 hours	Rs. 500

	planned supply interruption		
(iv)	Restoration after planned maintenance	Within scheduled time	Rs. 100 per day of delay
(v)	Restoration after unplanned interruption	Within 24 hours	Rs. 100 per day, max Rs. 3,000 per month
(vi)	Emergency responsetime (for leakage, fire, etc.)	Within 2 hours	Rs. 1,000

3. Metering and Billing Standards (PNG)

Sr. No.	Parameter	Standard/Timeline	Compensation for Non-Compliance
(i)	Meter accuracy	As per Weights and Measures regulations	Refund + interest at SBI PLR + Rs. 500 if error >10%
(ii)	Meter testing on consumer complaint	Within 7 working days	Rs. 500
(iii)	Bill generation frequency	Monthly	-
(iv)	Bill delivery before due date	At least 7 days before	Extension of due date by equivalent days
(v)	Billing error rectification	Within one billing cycle	Refund + interest at SBI PLR + Rs. 500 if error >10%
(vi)	Online access to bills	24x7 with 99% uptime	Rs. 500 per month if not provided

4. Complaint Handling Standards (All Consumers)

Sr. No.	Parameter	Standard/Timeline	Compensation for Non-Compliance
(i)	Acknowledgment of complaint	Within 24 hours	Rs. 200
(ii)	Resolution of Category A / Emergency / Critical complaints	Within 24 hours	Rs. 1,000 per day of delay,

			max Rs. 10,000
(iii)	Resolution of Category B / High Priority / Service complaints	Within 7 working days	Rs. 500 per day of delay, max Rs. 5,000
(iv)	Resolution of Category C / Normal / G1 complaints	Within 15 working days (PNG) or 7 working days (CNG, RO)	Rs. 200 per day of delay, max Rs. 2,000
(v)	Resolution of G2 Critical complaints (RO)	Within 15 working days	Rs. 200 per day of delay, max Rs. 2,000
(vi)	Resolution of LPG Category 1 Emergency complaints	Immediate; mechanic dispatch within 30 min	Rs. 500 if delayed
(vii)	Resolution of LPG Category 2 Service complaints	Initial response 48 hrs; resolution 14 days	As per escalation matrix
(viii)	Response to written complaint	Within 30 days	Rs. 500

IOCL LPG Inputs:

There cannot be any compensation when the cost of product to the customer is already subsidized, and the customer is not paying the true market price. Already the company is incurring huge under recovery in domestic LPG.

Therefore, there is no financial prudence to provide compensation to customers who are already enjoying product at below actual market price.

LPG Distributorships will bear the burden of the suggested compensation to customer.

The existing system of Grievance Redressal has evolved over six decades and has served its 16 crore customers well and is adequate.

Being an essential commodity, the rates & commission are decided by MOPNG and hence compensation framework is not desirable.

5. Customer Service Standards

Sr. No.	Parameter	Standard
(i)	Customer care helpline availability	As specified (8 AM - 8 PM minimum for service; 24x7 for emergency)
(ii)	Response time on helpline	Within 3 minutes
(iii)	Customer service center working hours	At least 6 hours on working days
(iv)	Website accessibility	24x7 with 99% uptime

(v)	Mobile app availability	24x7 with 99% uptime
(vi)	SMS/Email acknowledgment for complaint registration	Within 1 hour
(vii)	Complaint status tracking	Real-time online access

6. CNG Station Standards

Sr. No.	Parameter	Standard
(i)	CNG quality	As per technical standards and specifications
(ii)	Dispensing accuracy	As per Weights and Measures regulations ($\pm 2\%$ tolerance)
(iii)	Price display	Price per kg displayed prominently at each dispenser
(iv)	Calibration certificate	Valid certificate displayed prominently
(v)	Safety equipment and fire extinguishers	As per PESO and safety standards
(vi)	Queue management	Adequate dispensers to minimize waiting time
(vii)	Basic amenities	Functional toilets, drinking water, air filling services
(viii)	QR code for complaint registration	Displayed at prominent location

7. Retail Outlet Standards (Petrol/Diesel)

Sr. No.	Parameter	Standard
(i)	Operating hours	As per state regulations, minimum 12 hours per day
(ii)	Fuel quality	As per BIS standards (IS 2796 for Petrol, IS 1460 for Diesel)
(iii)	Dispensing equipment calibration	Valid certificate displayed prominently at each dispenser
(iv)	Display of MRP	Prominent display at each dispensing unit
(v)	Cleanliness of forecourt and facilities	Clean and hygienic conditions maintained
(vi)	Toilet facilities	Available free and functional (separate for men/women)
(vii)	Drinking water facility	Available free
(viii)	Air filling service	Available free
(ix)	Complaint mechanism display	Field Officer contact and complaint book availability prominently displayed

(x)	Complaint/suggestion book	Maintained and readily available to customers
-----	---------------------------	---

(i) To (iv) IOCL Retail Inputs:

BIS standards compliance is already legally mandatory under BIS Act

Calibration certificate display already required under Legal Metrology

Operating hours already specified in dealer agreements and state petroleum control orders.

(v) To (viii) IOCL Retail Inputs:

Already penal provision is mandated under the Minimum Service Obligation (MSO) of MDG, for non-provision of the basic facilities – Functional, clean & hygienic Toilets, Free drinking water and Free air.

(ix) To (x) IOCL Retail Inputs:

Field officer / dealer's contact are prominently displayed at ROs.

Complaint / Suggestion books are already maintained at retail outlets under IOC dealer agreements.

- MDG requires maintenance of customer feedback mechanisms.
- Many outlets also have suggestion boxes.

8. LPG Standards

Sr. No.	Parameter	Standard
(i)	Emergency helpline (1906)	24x7 availability with immediate response
(ii)	Service helpline (1800 2333 555)	8 AM to 8 PM on all days except national holidays
(iii)	Refill delivery	As per entity's service standards and commitments
(iv)	LPG cylinder weight	As per Weights and Measures regulations
(v)	Cylinder quality and safety	As per BIS and PESO standards
(vi)	Response to emergency leakage complaints	Mechanic dispatch within 30 minutes

SCHEDULE B: COMPLAINT CATEGORIZATION AND TAT**IOCL CGD Inputs**

To be reviewed in line with above

1. PNG Consumers (Domestic, Commercial, Industrial)

Category	Type of Complaint	TAT	Compensation for Delay (per day)	Max Compensation
Category A (Emergency /Critical)	Gas leakage, fire, explosion, safety emergency; Complete disruption of supply; Severe pressure issues; Billing errors >25%	24 hours (Immediate action for emergencies)	Rs. 1,000	Rs. 10,000
Category B (High Priority)	Activation delays; Partial supply failure; Pressure issues; Metering faults; Billing disputes; Payment issues	7 working days	Rs. 500	Rs. 5,000
Category C (Normal)	Service quality issues; Staff behavior; Minor billing/payment issues; General complaints, Requests such as pipe-related work	15 working days	Rs. 200	Rs. 2,000

Exclusions (Not treated as complaints) Mobile number change; Queries on bill cycle, office addresses; Queries on new CNG distributorship.

IOCL LPG Inputs:

Our view already articulated against various points mentioned above.

System of escalation matrix for resolution for complaints is already available at IOCL and LPG being an essential commodity the rates & commission are decided by MOPNG and hence compensation framework is not desirable.

2. CNG Consumers

Category	Type of Complaint	TAT	Compensation for Delay (per day)	Max Compensation
Category A (Critical)	Safety issues; Unsafe filling; Gas leakage/fire at CNG station	7 working days	Rs. 200	Rs. 2,000
Category B (Service)	Payment issues; CNG filling issues; Pressure problems; Service quality; Facility issues	7 working days	Rs. 200	Rs. 2,000

3. LPG Consumers

Category	Type of Complaint	TAT	Compensation for Delay
Category 1 (Emergency/ Leakage)	Leakage from cylinder, valve, regulator, hose, O-ring, hot plate	Immediate response; Mechanic dispatch within 30 minutes	Rs. 500 if delayed
Category 2 (Service-Related)	Delivery delays; Mechanic service; Booking issues; New connection issues; Overcharging; Subsidy; Staff behavior; Cylinder quality/quantity; Online service/payment	Initial response: 48 hours; Resolution: 14 days	As per escalation matrix timelines

Exclusions: Mobile number change; Distributorship queries; Urja Sakhi appointment queries.

IOCL LPG Inputs:

Our view already articulated against various points mentioned above.

4. Retail Outlet Consumers (Petrol/Diesel)

Grade	Type of Complaint	Initial	Resolut	Compensatio	Max
-------	-------------------	---------	---------	-------------	-----

		Response	ion TAT	n for Delay (per day)	Compensation
G1 (General)	Digital payment issues; Facility issues (washroom, water); Service issues (wait time, staff behavior, air service)	Within 72 hours	7 working days	Rs. 200	Rs. 2,000
G2 (Critical)	Quality & quantity (less fuel, tank capacity issue, meter not zero, adulteration suspected); Wrong product filled	Within 72 hours	15 working days	Rs. 200	Rs. 2,000

Important: Quality and quantity issues must be reported within 24 hours of purchase. Exclusions: Third-party vendor complaints; Judicial or police matters.

SCHEDULE C: QUARTERLY REPORT FORMAT FOR ENTITIES

Petroleum and Natural Gas Regulatory Board Consumer

Complaint Cell - Quarterly Report

Entity Name: _____ Quarter: _____ Year: _____

1. Consumer Base

Consumer Category	Opening Balance	Additions	Disconnections	Closing Balance
PNG Domestic				
PNG Commercial				
PNG Industrial				
CNG				
Total				

2. Complaint Statistics

Category	Received	Resolved	Pending	Within Timeline	Beyond Timeline
Category A (Critical)					
Category B (High Priority)					
Category C (Normal)					
Total					

IOCL Retail Inputs:

Every single retail outlet franchisee would need to:

- Categorize complaints into G1/G2
- Track resolution times at 6 escalation levels
- Calculate compensation amounts.
- Submit data to IOC for consolidation.
- Participate in consumer satisfaction surveys.

Disproportionate burden, while simpler systems already exist.

Proposed regulation does not add value to the end consumer and hence is not recommended for Retail.

3. Subject-wise Complaint Analysis

Subject	Number of Complaints	% of Total	Average Resolution Time (days)
Connection delays			
Supply interruption			
Quality issues			
Meter issues			
Billing disputes			
Overcharging			
Customer service			
Safety issues			
Others			
Total			

4. Compensation Paid

Category	Number of Cases	Amount Paid (Rs.)
Delay in connection		
Supply interruption		
Billing errors		
Quality issues		
Complaint resolution delay		
Others		
Total		

IOCL Retail Inputs:

Every single retail outlet franchisee would need to:

- Categorize complaints into G1/G2
- Track resolution times at 6 escalation levels
- Calculate compensation amounts.
- Submit data to IOC for consolidation.
- Participate in consumer satisfaction surveys.

Disproportionate burden, while simpler systems already exist.

Proposed regulation does not add value to the end consumer and hence is not recommended for Retail.

Quality of Service Performance

Parameter	Target	Achieved	Variance	Remarks
New connections within timeline				
Complaint resolution within timeline				
Billing accuracy				
Supply availability				
Emergency response				

5. Consumer Awareness Activities

Activity	Number of Programmes	Participants	Budget Spent (Rs.)
Workshops			
Campaigns			
Media advertisements			
School/College Programmes			
Others			
Total			

6. Escalations

Escalation Level	Number of Cases	Status
To senior management		
To Ombudsman		

To Board		
To consumer forums		

Certified that the information provided above is true and correct. Name

and Signature of Principal Nodal Officer: _____

Date: _____

Seal of the Entity: _____

SCHEDULE D: ANNUAL QUALITY OF SERVICE REPORT FORMAT

[To be submitted by 30th April every year for previous financial year]

Entity Name: _____

Financial Year: _____

Section I: Consumer Statistics

- (a) Number of consumers (category-wise, as on 31st March)
- (b) Number of new consumers added during the year
- (c) Number of disconnections during the year
- (d) Growth rate (%)

Section II: Connection Performance

Parameter	Target	Achieved	Achievement (%)	Remarks
PNG domestic connections provided				
PNG commercial connections provided				
PNG industrial connections provided				
Connections provided within timeline				
Average connection time (days)				

Section III: Supply Performance

Parameter	Instances	Remarks
Number of planned supply interruptions		
Average duration of planned interruptions		
Number of unplanned supply interruptions		
Average duration of unplanned interruptions		
Number of interruptions >24 hours		
Instances of quality non-compliance		
Instances of pressure non-compliance		

Section IV: Metering and Billing Performance

Parameter	Number	Remarks
Number of meter complaints		
Meters tested		
Meters found defective		
Billing accuracy (%)		
Number of billing complaints		
Billing errors rectified		

Section V: Complaint Handling Performance

Category	Received	Resolved	Pending	Within Timeline (%)
Category A (Critical)				
Category B (High Priority)				
Category C (Normal)				
Total				

Section VI: Compensation Paid

Type	Number of Cases	Amount (Rs.)
Connection delays		
Supply interruptions		
Billing errors		
Quality issues		
Complaint resolution delays		
Others		
Total		

Section VII: Consumer Satisfaction

- (a) Consumer Satisfaction Survey Score: _____
- (b) Overall satisfaction rating: _____
- (c) Key strengths: _____
- (d) Areas for improvement: _____
- (e) Action plan for improvement: _____

Section VIII: Consumer Awareness and Education

- (a) Number of consumer awareness programmes conducted: _
- (b) Participants reached: _
- (c) Budget spent on consumer awareness: Rs. _
- (d) Major campaigns/initiatives: _____

IOCL Retail Inputs:

Every single retail outlet franchisee would need to:

- Categorize complaints into G1/G2
- Track resolution times at 6 escalation levels
- Calculate compensation amounts.
- Submit data to IOC for consolidation.
- Participate in consumer satisfaction surveys!

Disproportionate burden, while simpler systems already exist.

Proposed regulation does not add value to the end consumer and hence is not recommended for Retail.

SCHEDULE E: MONTHLY DPNG & CNG PRICE BREAKUP DATA SUBMISSION REPORT**1. Monthly DPNG Price Breakup Data Submission**

1. Entity Name	
2. GA Name	
3. District	
4. Last Price Revision on (Date)	
5. Cost of Delivered Natural Gas to CGD entity (a+b+c+d)	
(a) Basic Cost (APM price) (~Rs. /MMBTU)	
(b) Pipeline Transportation Tariff in Rs. /MMBTU	
(c) GST on Transportation Tariff	
(d) State VAT (on a+b+c)	
6. Supply & Distribution Cost to CGD Entity	
7. Entity's Margin	
8. Basic Selling Price (5+6+7)	
9. VAT	
10. Any Other Tax (if applicable)	
11. Retail Selling Price (Rs. / SCM)	

Provided that Board may seek any further information in this regard.

2. Monthly CNG Price Breakup Data Submission

1. Entity Name	
2. GA Name	
3. District	
4. Last Price Revision on (Date)	
5. Cost of Delivered Natural Gas to CGD entity (a+b+c+d+e+f+g)	
(a) Basic Gas Cost (before Re-gasification) in Rs. / MMBTU	
(b) Regasification charges with GST (~Rs. / MMBTU)	
(c) State VAT	
(d) Marketing Margin of Seller	
(e) Pipeline Transportation Tariff (Rs. /MMBTU)	
(f) GST on Transportation Tariff	
(g) State VAT (on a+b+c+d+e+f)	
6. Supply & Distribution Cost to CGD Entity (i)+(ii)	
(i) Compression Charges	
(ii) Other charges	
7. Entity's Margin	
8. Basic Selling Price (5+6+7)	
9. Excise Duty	
10. VAT	
11. Any Other Tax (if applicable)	
12. Retail Selling Price (Rs. / Kg)	

Provided that Board may seek any further information in this regard.

Certified that the information provided is true and correct.

Name and Signature of Authorized Signatory: _____

Designation: _____ **Date:** _____

Seal of the Entity: _____

[Signed] Secretary

Petroleum and Natural Gas Regulatory Board New Delhi

Date: _____

IOCL Retail Inputs:

The PNGRB's proposed Consumer Protection Regulations for retail outlets are not serving the purpose because:

1. **Every substantive obligation already exists** under MS-HSD Order, MDG, Legal Metrology Act, BIS standards, or Consumer Protection Act
2. **The regulations create parallel bureaucracy** (6-level escalation + PNGRB portal + Ombudsman) instead of strengthening existing systems.
3. **They repackage existing requirements** as "PNGRB standards" without adding new protections.
4. **They add compliance burdens** (reporting, surveys, committees) without addressing actual consumer problems.
5. **They may harm universal service** by making remote outlets economically unviable through unfunded mandates.
6. **Micromanage operations** (QR codes, specific amenities, fixed compensation amounts) rather than setting outcome standards.

The original Universal Service Obligation (USO) framework is superior because it:

- Focuses on essential requirements (inventory, availability, non-discrimination)
- Is simple and verifiable.
- Doesn't create excessive bureaucracy.
- Recognizes the unique challenges of remote outlets.
