



Sui Southern Gas Company Limited

Ref: RA/26/20
Dated: 16 Oct 2019

Mr. Abdul Basit
Registrar
Oil & Gas Regulatory Authority
Plot # 54, ZTE Plaza, Fazal-e-Haq Road,
Near PIA Building, Blue Area,
ISLAMABAD

Subject: REVIEW PETITION FOR REVISED ESTIMATED REVENUE REQUIREMENT (RERR) FOR FY 2019-20.

OGRA Ref: Initial Directive under paragraph No. 10.1.2 given by the Authority in its DERR FY 2005-06 dated 20 May 2005, Latest Directive under paragraph No. 8.1.6 DERR FY 2019-20 dated 17 May 2019

Dear Sir,

As required vide Authority's Directive in its subject determinations referred above and consequent upon changes in well-head prices and estimates of gas off-takes since the OGRA determination of 17 May 2019, we submit the attached Review Petition for Revised Estimated Revenue Requirement (RERR) for FY 2019-20 under Section 8(2) of OGRA Ordinance 2002, Rule 4(3) of Natural Gas Tariff Rules 2002 for the Authority's consideration.

The cost of gas estimates have been revised considering average Crude Oil and HSFO C&F prices of US \$ 66.31 per barrel and US \$ 393.21 per metric ton respectively. The exchange rate parity has been assumed at average of Rs. 162/US\$ for the year under review.

Besides revision in Oil prices and exchange rate, the following assumptions have been adopted for purchases and sales:

- two months actual gas purchase volumes have been incorporated in the revised estimates with 10 months estimates as per OGRA determination on ERR for FY 2019-20.
- two months actual gas sales volumes have been incorporated in the revised estimates and remaining 10 months determined figures have been readjusted for keeping in view availability of gas.

In addition to the above regular items of mid-year review petition, the following items are also claimed in the instant review petition:

- Claim for items conceptually allowed in DMFR 2019-20.
- UFG Reduction Strategy Budget for FY 2019-20



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The OGRA Ordinance under Section 6 (2) (p) authorizes OGRA to (by Rules) fine for contravention of the Ordinance, rules, regulation, terms and conditions of the license and the decisions of the Authority.

Penalty as mentioned above has been specifically prescribed in Rule 20 of the Natural Gas (Tariff) Rules 2002 which lays down that a maximum of Rs. 750 Million for a continuing default in a financial year may be imposed. Rule 20 is clearly all encompassing in that all violations of the statute, rules, regulations, license, as well as orders, determinations, instructions etc issued by the Authority, i.e. OGRA, are covered by it.

Notwithstanding to the fact that we understand that inability to meet benchmarks is not violation of Statute etc., it is submitted that to date OGRA has penalized the Company in respect to UFG losses by forcing to bear the cost of the UFG that is over and above the "benchmark" set by it, and the amounts so adjusted from revenue requirements are far more than the amount that has been prescribed for violation of statutory provisions. Accordingly UFG disallowance (for indigenous gas business) has been restricted to Rs. 750 million in the instant review petition.

Notwithstanding to SSGC's stance on the issue of non-implementation of Policy Guidelines on RLNG volume handling by OGRA and the matter is under active consideration at Federal Government level; we have claimed UFG on volume handling basis relying on mandatory implementation of ECC / Cabinet Policy Guideline No. ECC-37/09/2018 dated: 11 May 2018.

Consequent upon continuous devaluation of Rupee against US\$, and items discussed in our instant petition, the short-fall of Rs. 22,674 million or Rs. 62.52 per MMBTU has been worked out in Review of Estimated Revenue Requirement for FY 2019-20.

The Demand Draft No. 107013037 dated: 7.8.19 amounting Rs. 200,000 (Pak Rupees Two Hundred Thousand only) in respect of prescribed fee for Review Petition is also attached.

The Authority is requested to condone a delay of one day in the submission of the petition and kindly grant interim relief under Rule 5(7) of Natural Gas Tariff Rules, 2002 and approve an increase in average prescribed price of SSGC effective 1st July 2019 to compensate for the increase in cost of gas to the extent of exchange rate fluctuations and UFG reduction strategy on immediate basis.

Above is submitted for urgent and favourable consideration of the Authority.

With best regards,


Syed Fasihuddin Fawad
General Manager (RA)
For Managing Director

CC: Mr. Shehzad Iqbal, Executive Director (Gas) OGRA
Mr. Atif Sajjad, Joint Executive Director (Finance) OGRA

And the Company doth hereby agree to ratify and confirm all and whatsoever the said Attorney shall lawfully do or cause to be done by virtue of this Power-of-Attorney. It is also being declared that all acts, deeds and transactions of the Attorney shall, notwithstanding any prior revocation or cancellation of this Power-of-Attorney be valid and effectual, unless such revocation shall have been previously notified to the person or persons acting or dealing with the Attorney And I consent to and expressly authorize the registration hereof before the concerned Registrar of assurances.

IN WITNESS WHEREOF the Executants of this Power-of-Attorney have set his hands unto this document in the presence of following witnesses on this 18 day of March 2019 and the common seal of Sui Southern Gas Company Limited is hereunto duly affixed.

(EXECUTANT)

Mohammad Wasim
Acting Managing Director
Sui Southern Gas Company Ltd.

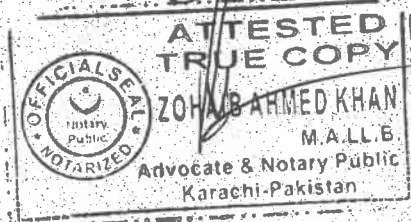
WITNESSES:

Haris Baber
1. MUHAMMAD HARIS BABER,
CNIC No. 41301-0216371-7

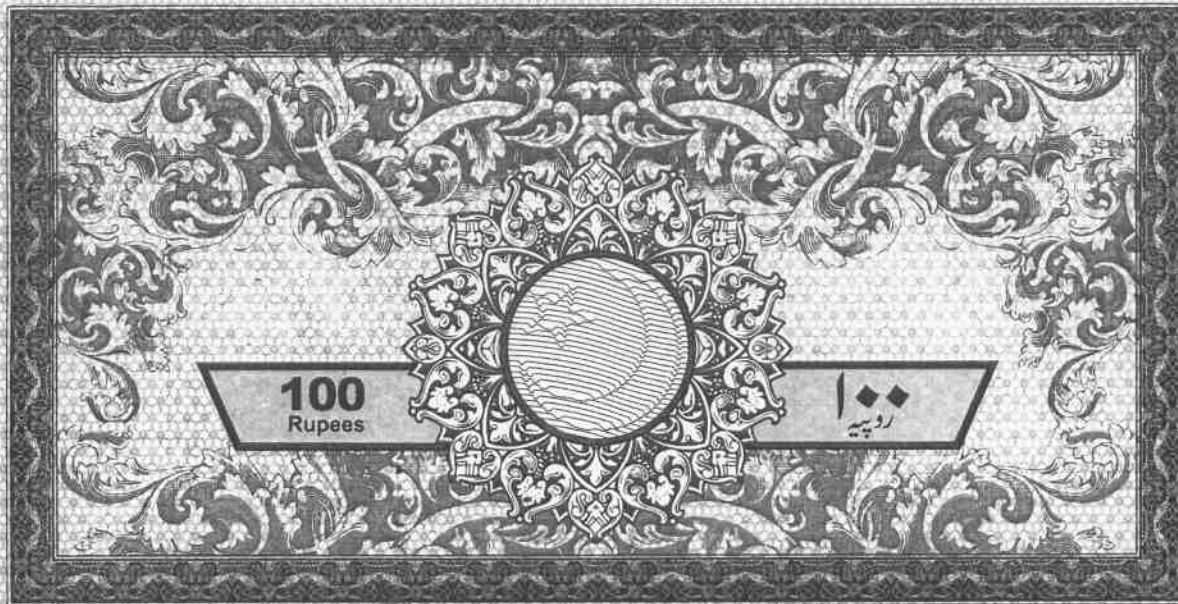
Talal Ahmed Umar
2. TALAL AHMED UMAR
CNIC No. 41304-5217621-3

Abu Talib Moosa Memon
JUSTICE OF PEACE
Empowered U/S 22-A & B, CR.PC.
As Magistrate Govt. of Sindh
KARACHI-PAKISTAN

22 MAR 2019



15 OCT 2019

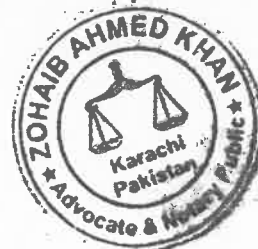


SYED SIKANDAR ALI JAFFRI STAMP VENDOR
 Licence No.86, Shop No.1-A, Karim Plaza
 - Gulshan-e-Iqbal, Block-14, Karachi
 S.NO.

1904
 DATE 06 AUG 2018

Shakih Muhammad Najam
 Advocate L.C. No. 12988

(RUPEES ONE HUNDRED ONLY)



ISSUED TO WITH ADDRESS
 THROUGH WITH ADDRESS
 PURPOSE
 VALUE RS
 STAMP VENDOR'S SIGNATURE

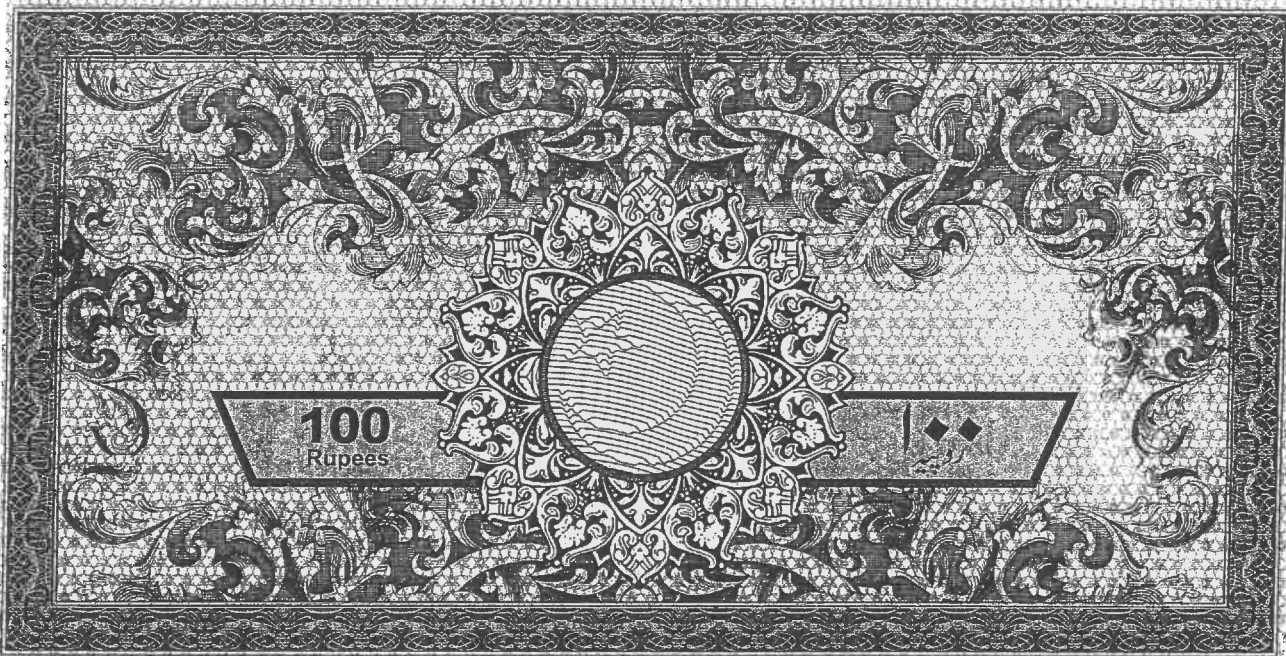
AFFIDAVIT

I, Syed Fasihuddin Fawad s/o Fazaluddin Syed, General Manager (Regulatory Affairs), Muslim Adult bearing NIC No. 42000-0563370-5 do hereby solemnly affirm that the information based on data received from the concerned departments of the Company and contained in SSGC's Review Petition for Revised Estimated Revenue Requirement for FY 2019-20 is true and correct to the best of my knowledge and belief.



15 OCT 2019

(Syed Fasihuddin Fawad)
 General Manager (RA)
 Sui Southern Gas Company Ltd.



D SIKANDAR ALI JAFFRI STAMP VENDOR
ence No.86, Shop No.1-A, Karim Plaza
ulshan-e-Iqbal, Block-14, Karachi

DATE 06 AUG 2018

Shakih Muhammad Najam
Advocate L.C. No. 12988

(RUPEES ONE HUNDRED ONLY)



ID TO WITH ADDRESS _____
NAME WITH ADDRESS _____
POSE _____
UE RS _____
VENDOR'S SIGNATURE _____

AFFIDAVIT

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(Syed Fasihuddin Fawad)
General Manager (RA)
Sui Southern Gas Company Ltd.

15 OCT 2018

SCHEDULE - I

OIL AND GAS REGULATORY AUTHORITY

Application Form

Company Profile																																												
1	Name of the Petitioner:	Sui Southern Gas Company Limited																																										
2	Full address of the Petitioner:	Head Office: ST-4/B, Block 14, Sir Shah Suleman Road, Gulshan-e-Iqbal, Karachi - 75300. PABX Tel: 021-99231500 Fax: 021-99231550																																										
3	The grounds giving rise to petitioner's interest forming the basis of the petition:	The review petition is filed to meet the requirement of section 8(2) of OGRA Ordinance read with Rule 4(3) of Natural Gas Tariff Rules 2002. The grounds of the petition forming basis of the requested review for determination of shortfall are annexed to the petition.																																										
4	Number & details of License:	Licence for Transmission, Distribution and Sale of Natural Gas Granted to Sui Southern Gas Company Limited # NG-001/2003.																																										
5	State, in a concise manner, the grounds and facts forming the basis of the petition and the relief or determination sought from the Authority.	<p>Our tariff working for FY 2019-20 reflects that an upward adjustment of Rs 62.52 per MMBTU in SSGC's prescribed price w.e.f. 1st July 2019 is required to adjust the shortfall in Co's revenues in gas operation as per licence condition # 5.2, prescribing 17.43% ROA and subsidy for LPG Air Mix Projects as per GoP directives.</p> <table border="1"> <thead> <tr> <th colspan="3">Rupees per MMBTU (Yearly Average)</th> </tr> <tr> <th>Determination ERR FY 2019-20 dt:-17-05-2019</th> <th>Review Petition ERR FY 2019-20</th> <th>Variance Inc. / (Dec.)</th> </tr> </thead> <tbody> <tr> <td>758.74</td> <td>757.23</td> <td>(1.51)</td> </tr> <tr> <td colspan="3">OPERATING REVENUES</td> </tr> <tr> <td colspan="3">OPERATING EXPENSES</td> </tr> <tr> <td>Cost of gas sold</td> <td>662.85</td> <td>685.98</td> </tr> <tr> <td>Adjustment for UFG above benchmark</td> <td>(54.02)</td> <td>(28.72)</td> </tr> <tr> <td>Other expenses</td> <td>76.70</td> <td>90.46</td> </tr> <tr> <td></td> <td>685.53</td> <td>747.72</td> </tr> <tr> <td>(Surplus)/Shortfall in Revenue Requirement in Gas Operation</td> <td>(73.21)</td> <td>(9.51)</td> </tr> <tr> <td>Subsidy for LPG Air Mix Projects over & above Gas Operation</td> <td>3.34</td> <td>3.28</td> </tr> <tr> <td>(Surplus) in Revenue Requirement</td> <td>(69.87)</td> <td>(6.23)</td> </tr> <tr> <td>Shortfall related to prior years</td> <td>69.87</td> <td>68.75</td> </tr> <tr> <td>Shortfall in Revenue Requirement of Natural Gas Customers</td> <td>-</td> <td>62.52</td> </tr> </tbody> </table>	Rupees per MMBTU (Yearly Average)			Determination ERR FY 2019-20 dt:-17-05-2019	Review Petition ERR FY 2019-20	Variance Inc. / (Dec.)	758.74	757.23	(1.51)	OPERATING REVENUES			OPERATING EXPENSES			Cost of gas sold	662.85	685.98	Adjustment for UFG above benchmark	(54.02)	(28.72)	Other expenses	76.70	90.46		685.53	747.72	(Surplus)/Shortfall in Revenue Requirement in Gas Operation	(73.21)	(9.51)	Subsidy for LPG Air Mix Projects over & above Gas Operation	3.34	3.28	(Surplus) in Revenue Requirement	(69.87)	(6.23)	Shortfall related to prior years	69.87	68.75	Shortfall in Revenue Requirement of Natural Gas Customers	-	62.52
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6	Summary of evidence giving brief particulars of the data, facts and evidence in support of the petition:	Statement showing head-wise Revenue Requirement is attached as per Annexure - A.																																										
7	List of all other petitions filed by the petitioner which are pending before the Authority at the time of the filing of this petition and which directly and significantly affect this petition, including an explanation of any material effect the grant or denial of those petitions will have on those other petitions:	1. Petition for Final Revenue Requirement FY 2017-18 dated 8 May 2019 seeking an increase of Rs 51,109 million or Rs. 138 per MMBTU in the prescribed price of the Company w.e.f. July 1, 2017 filed U/S 8(2) of OGRA Ordinance 2002 read with rule 4(3) of NGTR 2002.																																										
8	To be accompanied by details of the following market data	<table border="1"> <thead> <tr> <th>Category</th> <th>NG</th> <th>MMMBTU</th> </tr> </thead> <tbody> <tr> <td>Domestic</td> <td>3,159,828</td> <td>106,503</td> </tr> <tr> <td>Commercial</td> <td>23,718</td> <td>10,721</td> </tr> <tr> <td>Industrial</td> <td>4,319</td> <td>245,444</td> </tr> <tr> <td></td> <td>3,187,865</td> <td>362,668</td> </tr> </tbody> </table>	Category	NG	MMMBTU	Domestic	3,159,828	106,503	Commercial	23,718	10,721	Industrial	4,319	245,444		3,187,865	362,668																											
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	a) number and consumption details of consumers likely to be affected by the petition and,																																											
	b) if the petitioner is a licensee an estimate of the volume of natural gas to be transmitted, distributed or sold;	<table border="1"> <tbody> <tr> <td>Transmitted</td> <td>403,619</td> <td>MMMBTU</td> </tr> <tr> <td>Distributed and Gas Sold</td> <td>362,668</td> <td>MMMBTU</td> </tr> </tbody> </table>	Transmitted	403,619	MMMBTU	Distributed and Gas Sold	362,668	MMMBTU																																				
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	c) the petitioner's total annual peak day natural gas requirement;	MMCFD 1,619																																										
	d) the petitioner's forecast of yearly capital expenditure for five years including the year under evaluation.	As per Annexure - B																																										

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT SHOWING REVENUE REQUIREMENT

S.No.	DESCRIPTION	Determination ERR FY 2019-20 dt:-17-05-2019	Review Petition ERR FY 2019-20	Variance Inc./ (Dec.) Review Petition Over Determination		S.No.
					%	
1	Sales volume (MMCF)	349,064	355,363	6,299	2	1
2	Energy Sale in MMBTU	356,872	362,668	5,796	2	2
3		<u>(Rupees in million)</u>				3
4	<u>OPERATING REVENUES</u>					4
5	Gas Sales Revenue net of GDS	263,247	267,098	3,851	1	5
6	Sales of gas condensate (NGL)	198	198	-	-	6
7	Income from Sale of LPG	1,066	1,066	-	-	7
8	Other revenues	6,265	6,261	(4)	(0)	8
9	Total operating revenues	270,776	274,623	3,847	1	9
10						10
11	<u>OPERATING EXPENSES</u>					11
12	Cost of gas sold	236,551	248,782	12,231	5	12
13	Adjustment for UFG above benchmark	(19,278)	(10,415)	8,863	(46)	13
14	Transmission and distribution cost	17,306	21,781	4,475	26	14
15	Depreciation	5,506	5,826	320	6	15
16	Contribution to WPPF / Other charges	1,546	1,546	-	-	16
17	Return to SSGCL (ROA)	6,693	7,326	633	9	17
18	Total operating expenses	248,324	274,845	26,521	11	18
19						19
20	(Surplus)/Shortfall in Gas Operations Revenue Requirement	(22,452)	222	22,674	(101)	20
21	Subsidy for LPG Air Mix Projects over & above gas operation	1,191	1,191	-	-	21
22	(Surplus)/Shortfall in Revenue Requirement	(21,261)	1,413	22,674	(107)	22
23	Shortfall related to prior years	24,933	24,933	-	-	23
24	(Surplus)/Shortfall in Revenue Requirement	3,672	26,346	22,674	618	24
25	Staggering of Financial Impact on account of SHC Order	(3,672)	(3,672)	-	-	25
26	Total Shortfall in Revenue Requirement	-	22,674	22,674	-	26

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT SHOWING REVENUE REQUIREMENT

Rupees per MMBTU

S.No.	DESCRIPTION	Determination ERR FY 2019-20 dt:-17-05-2019	Review Petition ERR FY 2019-20	Variance Inc./ (Dec.) Review Petition Over Determination	%	S.No.
1						1
2	Energy Sale in MMBTU	356,872	362,668	5,796	1.6	2
3						3
4	<u>OPERATING REVENUES</u>					4
5	Gas Sales Revenue net of GDS	737.65	736.48	(1.17)	(0.2)	5
6	Sales of gas condensate (NGL)	0.55	0.55	-	-	6
7	Income from Sale of LPG	2.99	2.94	(0.05)	(1.7)	7
8	Other revenues	17.55	17.26	(0.29)	(1.7)	8
9	Total operating revenues	758.74	757.23	(1.51)	(0.2)	9
10						10
11	<u>OPERATING EXPENSES</u>					11
12	Cost of gas sold	662.85	685.98	23.13	3.5	12
13	Adjustment for UFG above benchmark	(54.02)	(28.72)	25.30	(46.8)	13
14	Transmission and distribution cost	48.49	60.06	11.57	23.9	14
15	Depreciation	15.43	16.06	0.63	4.1	15
16	Contribution to WPPF / Other charges	4.32	4.26	(0.06)	(1.4)	16
17	Return to SSGCL (ROA)	18.75	20.20	1.45	7.7	17
18	Total operating expenses	695.82	757.84	62.02	8.9	18
19						19
20	(Surplus)/Shortfall in Gas Operations Revenue Requirement	(62.92)	0.61	63.53	(101.0)	20
21	Subsidy for LPG Air Mix Projects over & above gas operation	3.34	3.28	(0.06)	(1.8)	21
22	(Surplus)/Shortfall in Revenue Requirement	(59.58)	3.89	63.47	(106.5)	22
23	Shortfall related to prior years	69.87	68.75	(1.12)	(1.6)	23
24		10.29	72.64	62.35	606.2	24
25	Staggering of Financial Impact on account of SHC Order	(10.29)	(10.12)	0.17	(1.7)	25
26	Total Shortfall in Revenue Requirement	-	62.52	62.52	-	26

Note:- ★ Consumers' prices have been taken as per notifications dated 29 June 2019, 9 August 2019 and 13 September 2019.

★★ Prescribed prices have been taken as per OGRA determination for FY 2019-20 dated 17 May 2019.
Net gas sales revenue (prescribed value) may change after the issuance of prescribed price notification by the Authority.

SUI SOUTHERN GAS COMPANY LIMITED
ESTIMATED PRESCRIBED PRICES

16

Rate Rs per MMBTU

CATEGORY OF CONSUMERS	PRESCRIBED PRICES <i>effective from 01-07-2019</i>	Price Adjustment	ESTIMATED PRESCRIBED PRICES <i>effective from 01-07-2019</i>
	as per determination dated 17-05-2019		
<u>DOMESTIC CONSUMERS</u>			
<u>a) Standalone meters:</u>			
<u>b) Religious places; Mosques, churches, temple, madrassas and hostels attached thereto:</u>			
Upto 50 CM per month - All off-takes at flat rate of	368.83		368.83
Upto 100 CM per month - All off-takes at flat rate of	368.83		368.83
Over 100 CM per month - All off-takes at flat rate of	553.24		553.24
Over 200 CM per month - All off-takes at flat rate of	737.65		737.65
Over 300 CM per month - All off-takes at flat rate of	1,106.48		1,106.48
Over 400 CM per month - All off-takes at flat rate of	1,106.48		1,106.48
Minimum charges (Rs. per month)	163.35		163.35
<u>c) HOSTELS & RESIDENTIAL COLONIES-BULK METERS</u>			
All off-takes at flat rate of	1,106.48		1,106.48
Minimum charges (Rs. per month)	4,680.09		4,680.09
<u>SPECIAL COMMERCIAL CONSUMERS (Roti Tandoors)</u>			
Upto 100 CM per month - All off-takes at flat rate of	368.83		368.83
Over 100 CM per month - All off-takes at flat rate of	737.65		737.65
Over 300 CM per month - All off-takes at flat rate of	841.41		841.41
Minimum charges (Rs. per month)	148.50		148.50
<u>COMMERCIAL CONSUMERS</u>	1,177.97	96.19	1,274.16
Minimum charges (Rs. per month)	5,880.10		5,880.10
<u>ICE FACTORIES</u>	1,177.97	96.19	1,274.16
Minimum charges (Rs. per month)	5,880.10		5,880.10
<u>INDUSTRIAL CONSUMERS</u>	937.57	96.19	1,033.76
Minimum charges (Rs. per month)	26,301.60		26,301.60
<u>ZERO-RATED SECTORS AND THEIR CAPTIVE POWERS</u>	721.21	96.19	817.40
Minimum charges (Rs. per month)	20,232.00		20,232.00
<u>C.N.G STATIONS</u>	1,177.97	96.19	1,274.16
Minimum charges (Rs. per month)	33,045.60		33,045.60
<u>CAPTIVE POWERS</u>	937.57	96.19	1,033.76
Minimum charges (Rs. per month)	26,301.60		26,301.60
<u>CEMENT FACTORIES</u>	1,171.96	96.19	1,268.15
Minimum charges (Rs. per month)	32,877.00		32,877.00
<u>PAKISTAN STEEL</u>	937.57	96.19	1,033.76
Minimum charges (Rs. per month)	26,301.60		26,301.60
<u>FAUJI FERTILIZER BIN QASIM LIMITED</u>			
Feed stock for fertilizer	222.37		222.37
Power generation	937.57	96.19	1,033.76
<u>EXISTING POWER STATIONS</u>	756.07	96.19	852.26
Minimum charges (Rs. per month)	21,209.88		21,209.88
<u>INDEPENDENT POWER PRODUCERS</u>	756.07	96.19	852.26
Minimum charges (Rs. per month)	21,209.88		21,209.88

Note:-

- Upward adjustment of Rs 62.52 per MMBTU for FY 2019-20 has been re-worked at Rs 96.19 per MMBTU with the consideration that effect of price adjustment not to pass on to domestic, special commercial (roti tandoors) customers and feedstock of fertilizer industry.
- Minimum charges as per consumer price notifications dated 29 June 2019, 9 August 2019 and 13 September 2019 issued by the Authority.

SUI SOUTHERN GAS COMPANY LIMITED
REVIEW PETITION FOR REVISED ESTIMATED REVENUE REQUIREMENT
(RERR) FOR FY 2019-20

SSGC prepared and filed Petition with OGRA for Determination of its Estimated Revenue Requirement (ERR) for FY 2019-20 on 30 November 2018 requesting an increase of Rs.106.5 per MMBTU or shortfall of Rs. 38,020 million in the Prescribed Price for FY 2019-20.

The Authority vide its order dated 17 May 2019 determined a shortfall of Rs.56,986 million, including last year's i.e. FY 2018-19 revenue shortfall of Rs. 24,933 million (or 69.87/MMBTU) thus determined to increase the Prescribed Price (Retainable price) of the company with effect from 01 July 2019 by Rs.159.68 / MMBTU.

Being aggrieved of the determination for certain issues, SSGC filed the Motion for Review on 15 June 2019 under Rule 16 of the Natural Gas Tariff Rules 2002 for Authority's consideration and claimed a shortfall of Rs. 12,871 million or 36.07 million per MMBTU. OGRA re-calculated HR cost on existing benchmark and deferred the financial impact till the determination of upcoming revenue requirement. Further the Authority conceptually approved certain heads of capital and revenue expenditures and deferred its financial impact to the Final Revenue Requirement (FRR) based on actual expenditures/capitalization for the said year. The Authority altogether disallowed the claim on RLNG volume handled.

Authority vide its decision on ERR for FY 2005-06 dated: 20 May 2005, directed the Company to file Mid-year Review Petition by 15 October of a year. The same direction was also communicated vide Para 8.1.6 of the determination dated 17 May 2019. In view of Authority's directions and due to subsequent changes in circumstances, company would like to submit the following items in the instant Review Petition for Authority's consideration:

1. **Cost of Gas**
2. **Gas sales revenue**

1. Cost of Gas / 2. Gas Sales Revenue

Basis / assumptions are attached at Annexure "D-1".

In addition to the above regular items of mid-year review petition, the below given items are also claimed in the instant review petition based on the justifications provided hereunder:

Claim for items conceptually allowed in DMFR 2019-20.

In its Determination on Motion for Review dated: 3 October 2019 the Authority has principally / conceptually agreed and allowed certain Revenue and Capital

Expenditure items but deferred their impact to be passed on to the Prescribed Prices till the time of upcoming Revenue Requirement / Final Revenue Requirement Determination of the said year. The same are claimed in the instant review petition as per following details:

- i. Authority re-calculated the HR Benchmark cost and additionally allowed Rs. 1,364 Million and has said that its financial impact shall be given in the upcoming revenue requirement.
- ii. Authority allowed Rs. 492 Million against capitalization of Fixed Assets and deferred the financial impact of such capitalization to the FRR of the said year.
- iii. Further the Authority conceptually agreed certain revenue expenditure items of Rs. 1,320 Million against gas consumed internally, store, spare, supplies and repair & maintenance. The impact of these agreed items will also be considered at the time of FRR of the said year.

The items referred above have been claimed in the instant petition keeping in view the importance of timeliness of determination of Estimated Revenue Requirements. Any shortfalls not covered at the time of ERR / Mid-year review petition remain unadjusted in consumer prices. In this regards following are our further submissions.

The revenue requirement shortfall determined for FY 2016-17 resulted in GDS receivable balance in the books of accounts of the company to the tune of Rs. 21,265 million. .

Company's Final Revenue Requirement for FY 2017-18 claiming a shortfall of Rs. 51.1 Billion is under consideration of the Authority. An amount of Rs.25 Billion has been passed on to DERR for FY 2019-20 from FY 2018-19 being not adjusted in consumer prices for FY 2018-19. It is pertinent to mention here that the consumer prices notified so far for FY 2019-20 are not sufficient to meet the revenue shortfalls.

In view of the above position of GDS, the justified items which are conceptually allowed but not included in the revenue requirement determination by the Authority at the estimated stage could not be passed on to the customer in a timely manner within the respective year. Therefore, the Authority is requested to allow these items along with other items claimed in the instant petition to mitigate the possibility of further accumulation of receivable GDS at the FRR stage.

UFG Disallowance

The OGRA Ordinance under Section 6 (2) (p) authorizes OGRA to (by Rules) fine for contravention of the Ordinance, rules, regulation, terms and conditions of the license and the decisions of the Authority.

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Penalty as mentioned above has been specifically prescribed by OGRA in Rule 20 of the Natural Gas (Tariff) Rules 2002 which lays down that a maximum of Rs. 750 Million for a continuing default in a financial year may be imposed. Rule 20 is clearly all encompassing in that all violations of the statute, rules, regulations, license, as well as orders, determinations, instructions etc issued by the Authority, i.e. OGRA, are covered by it.

Notwithstanding to the fact that we understand that inability to meet benchmarks is not violation of Statute etc, it is submitted that to date OGRA has penalized the Company in respect to UFG losses by forcing to bear the cost of the UFG that is over and above the "benchmark" set by it, and the amounts so adjusted from revenue requirements are far more than the amount that has been prescribed for violation of statutory provisions. Accordingly UFG disallowance (for indigenous gas business) has been restricted to Rs. 750 million in the instant review petition.

RLNG volume handling impact on UFG

Notwithstanding to SSGC's stance on the issue of non-implementation of Policy Guidelines on RLNG volume handling by OGRA and the matter is under active consideration at Federal Government level; we have claimed UFG on volume handling basis relying on mandatory implementation of ECC / Cabinet Policy Guideline No. ECC-37/09/2018 dated: 11 May 2018.

UFG Reduction Strategy Budget FY 2019-20

A "Strategy for UFG Reduction" has been developed and presented to SSGC BoD for its modalities/implementation and as such additional amounts/budgetary requirements were estimated in the form of "UFG Reduction Strategy Budget FY 2019-20". Therefore, the same is being claimed with the Authority in the form of revenue requirement in the said petition along with other regular items of Mid-year Review Petition. The detailed explanations chalking out the need, necessity, importance, roadmap and practical application of "UFG Reduction Strategy Budget FY 2019-20" is attached as Annexure "D-2".

Recently MoE vide its letter No. NG(I)-7(190)/19-Vol-IV dated: 25 September 2019, required a "UFG Reduction Plan" to meet the IMF requirements under Extended Fund Facility (EFF). Any further development in this regards shall be communicated in due course of time.

The Tables for Transmission and Distribution cost and addition to Fixed Assets depicting the above are as under:

TRANSMISSION AND DISTRIBUTION COST

Rs. Million

FY 2019-20							
S.NO.	Description	Petition ERR (A)	OGRA Det ERR (17-05-2019) (B)	UFG Reduction Strategy Net Additional Requirement (C)	Conceptual approval at FRR in MFR (D)	Review Petition (E)	Addl amount in Review Petition (F=E-B)
A	Normal Items						
1	Salaries, wages, and benefits at benchmark	15,492	14,156		1,364	15,520	1,364
2	Gas consumed internally	740	405	-	382	817	412
B	UFG Reduction related Strategy Budget FY 2019-20						-
3	Stores, spares and supplies consumed	1,267	798	191	263	1,252	454
4	Rent, rate & taxes	311	311	1	-	312	1
5	Postage & Bill delivery through contractor	132	103	12	-	115	12
6	Repairs & maintenance	2,683	1,633	1,234	675	3,542	1,909
7	Legal charges	237	100	99		199	99
8	Professional charges	99	46			46	
9	Security expenses	773	722	221	-	943	221
10	Others	279	149	3	-	152	3
11	Sub-total UFG Reduction related Strategy	5,781	3,862	1,761	938	6,561	2,699
12	Relevant T&D Cost	22,013	18,423	1,761	2,684	22,898	4,475

DETAILS OF ASSETS CLAIMED

Rs. Million

Particulars	FY 2019-20						
	ERR	DERR	Amount Claimed by the Company in MFR	Addl. Amount Allowed by the Authority in MFR	Additional Amount Required for UFG Reduction Strategy	Review Petition	Addl. Amount in Review Petition
	(A)	(B)	(C)	(D)	(E)	(F=B+D+E)	(G=F-B)
Gas Distribution System	8,498	5,994	2,504	246	4,807	11,047	5,053
Computer Software	140	9	61	60	20	89	80
Appliances, Loose Tools and Equipment	1,204	306	518	28	125	459	153
Vehicles	1,107	177	573	102	474	753	576
Construction Equipment	385	27	182	56	0	83	56
Building and Civil Works	281	140	0	0	28	168	28
Plant and Machinery	774	336	0	0	187	523	187
Computer & Allied Equipment, Office Furniture	349	237	0	0	44	281	44
Total	12,738	7,226	3,838	492	5,685	13,403	6,177

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ANNEXURE "D.1"

ASSUMPTIONS

Cost of gas:

The estimates for cost of gas have been worked out on the following parameters:

- Two months actual gas purchase volumes have been incorporated in the revised estimates with 10 months estimates as per OGRA determination on ERR for FY 2019-20.
- Table below shows Actual / Estimated Average Crude Oil and HSFO C&F prices taken in the revised estimates for the year under review as against OGRA Determination on Estimated Revenue Requirement (DERR) dated: 17 May 2019.

	Applicable Period	DERR 17-05-19	Review Petition	Variance DERR	
		US \$	US \$	Amount	%
Crude Oil	July-Dec. 19	63.50	66.39	2.89	4.5
	Jan. June 20	70.00	66.24	-3.76	-5.4
	Yearly Avg.	66.75	66.31	-0.44	-0.66
HSFO	July-Dec. 19	400.00	397.37	-2.63	-0.66
	Jan. June 19	400.00	389.05	-10.95	-2.74
	Yearly Avg.	400.00	393.21	-6.79	-1.70

- Actual monthly average rates of HSFO & Crude Oil have been taken up to September 2019, while prices beyond September 2019 have been taken on the basis of DERR.
- The US \$ v/s rupee parity scenario is too volatile. The existing US \$ rupee parity is Rs. 156.50 and during the period from July to August 2019 the maximum rate has been noticed was Rs. 160.78.
- For the first half rupee dollar parity of Rs. 158.39 has been taken. For 2nd half, the projected exchange rate parity average of Rs. 164.96 per US\$ has been considered, resulting in revised estimated overall average of Rs. 161.68 per US\$ for the year as tabulated below. **SSGC however reserves the right to amend the instant petition or file further review petition for change in cost of gas estimates due to further currency devaluation.**

Description	DERR 17-05-19	Review Petition	Variance	
			Amount	%
July Dec. 19	150.00	158.39	8.39	5.6
Jan. June 20	150.00	164.96	14.96	10.0
Average	150.00	161.68	23.35	15.6

- The estimated SSGC weighted average cost of gas has increased to Rs.618.40 against determined figure of Rs.576.58 per MMBTU.

Gas sales revenue:

- a. Two months actual gas sales volumes have been incorporated in the revised estimates and remaining 10 months estimates determined figures have been readjusted keeping in view availability of additional gas.
- b. Consumers' prices have been taken as per notifications dated: 29th June 2019, 9th August 2019 and 13th September 2019. Since the Prescribed Price Notification for FY 2019-20 is pending at OGRA, the Customer Category wise Prescribed Prices have been taken provisionally as per OGRA determination for FY 2019-20 dated: 17 May 2019. Accordingly table B-3.1, 3.2, C-5 and C-6 will be revised after issuance of the notification referred above by OGRA.
- c. Sales revenue has been revised as some of the industrial consumers have been granted stay from Sindh High Court against price notification dated: 29 June 2019. The impact of these stay orders have been accounted for in this petition to the extent of stays granted till date.
- d. As per the ECC / Cabinet decision, revised sales price of special commercial consumers (Roti Tandoor) have been issued through notification dated 13 September 2019; as a consequence of the decision allowing direct subsidy; revenue generated if any will be offered at a later stage.

STRATEGY FOR UFG REDUCTION – F.Y. 2019-20

Introduction and Background

Keeping in view the rising trend of UFG in the entire franchise of SSGC since last few years, it has become a major concern for the Management, Board and the Ministry, as well as the Prime Minister's Office. To overcome the problem and curb the increasing UFG, a five-year plan was prepared and shared with CCoE, ECC and the Prime Minister's Office. The proposal for reduction of UFG in five years period was not accepted and SSGCL and SNGPL were directed to bring down the UFG to the OGRA allowed benchmark in two years, i.e. Financial Year 2019-20 and 2020-21. Accordingly, targets for physical activities were prepared at divisional and departmental levels and shared with the UFG Committee of the Board and the Ministry. Though, the targets of UFG reduction are very stringent, SSGC management is committed to achieve these targets at maximum level.

In order to achieve these stringent targets, the management has decided to formulate a comprehensive strategy at Divisional, Departmental, Regional, Zonal and Sub Zonal level.

Annual targets of Karachi, Interior Sindh and Balochistan, already approved by the Board and the Ministry, is attached as Annex-A

Overall Company-wide strategy for achieving the desired targets and results derived from the strategy of Divisional, Departmental, and Regional levels, is given below:

Strategy to Achieve Targets

Network Segmentation

This exercise is already under way and is being arranged through own existing available resources. To make segmentation more effective not only for the purpose of UFG monitoring but also to segregate high pressure Industrial and low pressure Domestic customers so that the distribution network may be operated at optimum level. In the South Region in 1st phase, high pressure Industrial customers will be segregated from domestic customers on dedicated network.

In the Northern Regions, mostly there is domestic network, in the 1st phase segmentation would be made considering the geographical boundaries of Zones and Subzones, so that respective in-charges should be made responsible and their performance could be monitored independently. Moreover, the reconciliation process will be refined.

Improve the accuracy of alignment for billing areas and customer with SMSs / TBSs / PRSs and UFG Zones. Integration of Mazik, GIS and CC&B / COGNOS through close coordination and collaboration of Measurement, Distribution, Billing and IT Departments will be done to improve system-based information and monitoring.

Rehabilitation

There are several difficulties being faced in execution of Rehabilitation schemes, e.g. permissions of road cutting from Municipal Authorities, availability of material, lengthy procurement process for services of ditching contractors and insufficient resources.

To overcome the above deficiencies and to achieve the targets of FY 2019-2020, steps have already been taken in the last Quarter of F.Y 2018-19. Schemes, measuring length 400 Kms are approved and under tendering process to meet the targets of current year and for next year schemes have been identified and are under planning.

Work on 8 Nos schemes measuring length 110 Kms has already started.

To overcome the road cutting permission issues, timely agreements have been executed with the concerned Municipal Administration of the Northern Regions for the next two years. Whereas, in the Southern Region, different agencies are involved in granting road cutting permissions, therefore, the matter is being pursued by deploying the special teams to get the permission case to case basis.

Keeping in view the constraints of resources and difficulties in execution of rehabilitation schemes, this year 25% of the target is planned to be executed through outsource. TORs for pre-qualification of contractors are under preparation and pre-qualifications will be completed by end December, 2019. This is also essential for the coming years where the targets are enhanced to achieve the desired results.

Underground & Overhead Leak Survey and Repairs

The survey will be carried out in the high UFG prone segmented areas to make the exercise result oriented. The targets are substantially enhanced; the labour requirements for around 50% targets of underground survey only, will be outsourced through existing pre-qualified labour contractors.

Portable and Mobile Gas Leak detection equipment, along with survey software in order to record and monitor the survey data in our GIS, to be introduced for which budget provisions have been proposed.

To survey 100% of the network and customers in a one-year cycle, outsource services will be required. The TORs for pre-qualification of contractors are under preparation and pre-qualifications will be completed during this year for future planning.

Besides above, CS division is given task to install bulk meters at Flat Sites to measure and reconcile purchase and sale and rectify leakages in Intermediate and common house lines.

Prompt resolution of leak complaints will be ensured through monitoring of database on regular basis.

Metering Accuracy

Measurement department looks after 4,164 Industrial Customer Meters. In order to improve the accuracy of Industrial Meters, Measurement department has planned following actions / activities:

1. Measurement department has been given task to complete replacement and proving of Industrial Meters within 02 years. This activity is carried by meter replacement and field proving of meters at Customer site.
2. To improve metering accuracy EVCs and TOCs installed on meter are planned to be replaced. Existing EVCs and TOCs are more than 7 years old. 1,600 EVCs / TOCs are planned to be procured during current FY for additional budget is required.
Furthermore, there is a need to ensure accuracy of installed EVCs from time to time. In order to cater this requirement EVC field calibrator is planned for procurement within this fiscal year with budgeted amount of Rs. 4 Million.
3. For bulk customers and for TBSs Turbine Meters which are more than 10 to 12 years old, meter modules are planned to be replaced. As per Industry Standard their replacement period is 5 years. In this regard 60 modules are planned for procurement.
4. Apart from meter replacement, Measurement department carry out field proving of small industrial meters upto 16,000 cft /hr. at customer's site which is treated as meter replacement. To increase the field proving capacity 01 additional field prover of 20M capacity is planned to be procured.
5. To improve the Commercial and Domestic metering accuracy CS division is replacing commercial and domestic meters. Especially, target of domestic meter replacement is being enhanced by 100% from the previous year. Previously this exercise was being carried out by CS division alone. This year Distribution department is actively involved to replace the targeted meters on the advice of CS division.
6. All replaced Industrial, Commercial and Domestic meters are tested at 04 Nos. Meter Repair Shops. With the enhanced targets for meter replacement of all categories, it is essential to increase the meter proving capacity of Meter Repair Shops. In this regard, following equipment and manpower along with additional budget is required:
 - a) Procurement of 01 Nos. 230,000 cft / hr. capacity prover, for which additional budget is required to prove Large Bulk Industrial Meters.
 - b) Procurement of 02 Nos. SNAP Prover of Commercial meters.
 - c) Procurement of 10 Nos. Dry Teat Meters for testing of domestic meters.
 - d) Since the available space at Meter Repair Shops have been fully occupied with existing resources and to install additional test benches, pre-fabricated building for meter testing is planned for Meter Repair Shop Karachi.
 - e) To carry out meter testing of such large number of meters additional revenue budget is required for 120 Contractual Workers and additional budget is required for 01 Nos. Truck for increased Logistics of meters.

7. Measurement methodology for UFG reduction activities includes 03 activities i.e. (i) meter replacement, (ii) field proving and (iii) industrial meter testing through which estimated 02 BCF volume is projected to be recovered above existing volumes. Furthermore, with domestic meter testing approximately 6 to 7 BCF will be recovered in coordination with CS Division.
8. Progress Monitoring Mechanism is in place through which daily jobs assigned to the teams are recorded in CC&B system through Field Activity generation and after completion of assigned activities by the field teams, these field activities are marked as completed in CC&B system.
- Centralized Data Reporting Cell headed by DCE generates Daily, Weekly and Monthly reports which is circulated internally to Sectional Incharge(s), DGMs and GM of Measurement department.
- Progress monitoring mechanism is annexed for monitoring mechanism and for UFG reduction actions.

Theft Control

While following the operational cycle of effective intelligence, forceful & swift operations both during day & night culminating into prosecution and conviction of culprits, three different strategies are adopted for three distinct geographical regions described as under:

- a. Karachi. It consumes 70% of gas supplied by SSGC, has about 90% of total industry in area of franchise and its share in UFG is 55% (41.7 BCF). Major portion of theft / UFG is hidden in Industrial Sector and KACHI ABADEES / High Rise Buildings where NOCs from KDA to supply gas is not available. Thus, two-pronged strategy is being applied in Karachi; firstly, detailed Joint Industrial Load Survey and secondly, sweep against KACHI ABADEES / High Rise Buildings. Simultaneously, development of Intelligence mosaic indicating high theft prone areas and pinpoint major culprits are being done; generating minimum 4 operations per day against direct use of gas and domestic to commercial crime. Existing capability of detailed joint survey of industries in a week has been brought to about 20 Industries per month. We are now targeting 1000 Industries in next one year. Present capability of generating 4 x operations per day against direct use of gas / domestic to commercial crime is being increased to 10 x operations per day. Present capability to sweep KACHI ADABEES and High Rise Buildings is also being doubled.
- b. Interior Sindh. It consumes around 20% of total gas supplied by SSGC and its contribution in UFG is 16% (12.45 BCF). The major crime in Sindh is use of heavy-duty generators to run Ice Factories, Rice Mills and supply of electricity to domestic & commercial users during WAPDA outages. Mostly these generators are directly tapped with Distribution Pipelines. In addition, individual household in big number in villages close to Distribution Pipelines, tap directly for domestic use. SSGC generates operations from 4 x bases (Hyderabad, Nawabshah, Sukkur and Larkana). On the average, minimum of two operations are generated from each base daily against gas theft. This capability is planned to be tripled in next one year. Alongside Intelligence development and Joint Industrial Load Survey (in Sindh less Karachi, only 5 to 6% of total industrial customers are located) is being generated in a way that 100% Industrial Customers are surveyed in next one year.
- c. Quetta / Baluchistan. Baluchistan consumes 10% of total gas supplies of SSGC. Its share in UFG is around 30% (22.84 BCF). The main avenue of theft is domestic

meter tampering specially during winters when day and night use of gas makes average bill beyond the paying capacity of common people (around 30 to 35 thousand rupees). Second major area of theft is villages along Transmission / Distribution Lines. They tap the gas pipeline and illegally gasify the village. Due to peculiar law and order / ethic / tribal situations; operations against mass gas theft, through domestic meter tampering, has not been undertaken as yet. The company replaces the domestic meters in bulk and after meter testing, books the extra theft volume on consumers. Operations however are generated against direct use of gas in Hotels, Water Hydrants, CHUNA BHATTIS and domestic to commercial use. On an average, 2 to 3 operations per week are generated in Quetta and surrounding areas. The plan is to increase number of operations to 3 operations per day. Operations against mass meter tampering are planned to be launched in coordination with Provincial Government, FC Balochistan and Balochistan Police.

To support above strategy, following resource management is being done by SS&CGTO Department.

a. Karachi

- (1) Gradual increase of staff strength of SSGC Police Station from 49 to 80.
- (2) Increase in staff strength of Intelligence Wing by 10 additional persons. (5 teams).
- (3) Increase in staff strength of Operations Wing by 30 additional persons. (6 Teams).
- (4) Increase in Joint Load Survey Teams from existing 1 to 6 teams.
- (5) Existing fleet of vehicle will be augmented with 4 x Double Cabin & 8 x Smaller Vehicles.
- (6) Establishment of exclusive 1 to 2 Gas Utility Courts for Karachi, with the help of Chief Justice Sindh High Court.
- (7) Engagement of senior legal advisor in criminal cases.

b. Interior Sindh

- (1) Establishment of SSGC Police Station at Hyderabad and Larkana.
- (2) Increase of Intelligence Wing strength by 4 x persons. (2 Teams).
- (3) Increase of Operations Wing strength by 10 x persons. (2 Teams).
- (4) Establishment of 2 x Joint Industrial Load Survey Teams.
- (5) Augmentation existing fleet of vehicles with 4 x Double Cabin and 6 x smaller vehicles. (1 at each base, i.e. Hyderabad, Nawabshah, Larkana and Sukkur).
- (6) Engagement of senior counsel, at Hyderabad and Larkana for criminal cases at Sindh High Court circuit benches.

c. Quetta / Baluchistan

- (1) Establishment of SSGCL Police Station in Quetta.
- (2) Increase of Intelligence Wing strength by 6 persons. (3 Teams)
- (3) Increase of Operations Wing strength by 10 persons. (2 Teams)
- (4) Establishment of 1 Joint Industrial Load Survey Team.

Monitoring Mechanism: Elaborate arrangements have been made to monitor progress in shape of daily, weekly, monthly, and yearly reports. These reports indicate number and areas of operation, gas volumes claimed, gas theft claims raised and recovered amount etcetera. Along with it, registration of FIRs, Recovery Suites and criminal prosecution is also being closely monitored.

External and Internal Penalties: External defaulters are being dealt through Gas Utility Courts under Gas Theft Control and Recovery Act 2016. The law covers both criminal as well as civil remedies. A wing for Internal Watch has been established in SS&CGTO Department. Internal staff, if directly involved in abetment of a gas theft crime, is dealt through the legal criminal prosecution in the courts. In addition, this strategy is aiming at pointing out the relevant SSGC Staff, who consistently visited the gas theft crime scene (domestic, commercial or industrial theft) and did not report the pilferage or unlawful activity to the concerned authorities. All such cases will be referred to HR Department for further disposal as per company policy.

The Industrial and commercial theft will be covered by CGTO and as usual for domestic theft CRD and Distribution departments have already enhanced their activities and are being monitored on daily basis. Furthermore, additional resources have been proposed to enhance the capabilities to achieve the targets.

Beside above, CS division will arrange 100% survey of disconnected commercial customers on quarterly basis and 20% of disconnected domestic customers will be checked for any theft and prompt action will be taken accordingly.

Theft culture is highly developed, particularly in high rise buildings, due to the non-availability of Building Control Authority NOCs; development of Un-authorized Kachi Abaadies and private colonies, where SSGC cannot lay the network or provide connections. To overcome this problem and to control the theft, strategy is developed to install domestic bulk meters at locations which are already identified to measure the volume and bill to the residents accordingly. The meter will be installed in the name of notable person who will be responsible for the recoveries. This would be temporary arrangement and will be discontinued once the areas gasified legally.

Establishment of UFG Control Rooms at Regional level

Measurement Control Room has been established and operational. To further improve the coordination between the Control Room and Field Teams revamping has been planned. This will help in better coordination and proactive response to metering related issues.

At the regional level UFG control rooms are being established and will be made functional by the end of first quarter of current year. The control room will be beneficial in monitoring and reporting of data from SMSs and TBSs on daily basis and generate MIS for the concerns for ensuring timely actions.

Control room will have access to Mazik, ERP, CC&B and Cognos.

The control room Incharge will be at least Deputy Chief / Chief Engineer level with following minimum staff and Equipments:

Sr. Engineer / Managers	02
Assistant / Trainee Engineers	02
Key punch operators	03
Computers	08
Printers	02
Scanners	01

The control room will responsible for following actions:

- Daily progress reports will be obtained from Zones, Sub Zones against the UFG related activities compile the same and prepare Sub Zone wise weekly, bi-monthly and monthly progress reports. Same will be dispatched to concerned SGMs, GMs, RMs, ZMs, SZMs and UFG department.
- Daily overhead and underground leak survey & rectification work, replacement of meters will be updated in CC&B on daily basis.
- Monitoring of daily SMS and TBSs Flow rates / pressures through Mazik and share with respective Zones and Sub Zones for appropriate action if any abnormalities is noticed.
- Prepare monthly, weekly, bi-monthly and monthly MIS for purchase at SMSs and TBSs in comparison with last year's purchase of corresponding period and send it to concerned SGMs, GMs, RMs, ZMs, SZMs and UFG department.
- Monthly reconciliation of SMSs, TBSs and UFG zones with purchase and sale alongwith the comparison of last year's corresponding months will be prepared and shared with SGMs, GMs, RMs, ZMs, SZMs and UFG department.
- Coordinate with Billing regarding the checking of Nil, Minimum and meter replacement activities at Regional, Zonal and Sub Zonal level.
- Coordinate with the RMs, ZMs, and SZMs regarding the material requirement and accordingly requisitions will be raised to MCU for necessary arrangements under intimation s to concerned GMs and SGMs.
- Coordination between Finance department for approvals and payment related matters to affect timely disbursement to contractors.

Billing Accuracies

100% meter reading will be ensured electronically through handheld sets, it will be ensured through continuous monitoring of all parameters like GPS location, time of reading, duration of read etc. for which the devices are already compatible.

Obtain 100% Meter Read images on handheld set through meter readers to improve meter read quality.

Further improve the systems for timely and correct actions against bill in errors in pre-billing cycle and such action will be based on physical field verification. Special teams will be deployed to check at least 10% queries settled by the meter readers / inspectors.

Pressure survey in domestic connections will be enhanced by utilization of Overhead Leak Survey and meter replacement teams. The customers will be billed on actual pressure. Proper record keeping and evidences will be ensured to supports of claims.

The domestic meter reading mechanism will be reviewed to improve the accuracy of punching the proper billing codes by the meter reader through implementation of reward and penalty system

Survey of domestic customers having more than the authorized load (generators, geysers, gas fired chillers etc.) will facilitate to bill the customers as per their actual load after incorporating the existing / actual line pressure. If required the meter will be replaced to cater the actual consumption of the customer.

Effective combing exercise for those areas where the consumption of the customers falls as compared to the previous month or same month of the previous year.

Random checking and meter reading of the domestic and commercial customers to ensure meter reading accuracy and discourage any meter reversal or tampering.

Format of domestic billing will be met customer friendly and can easily be understandable.

Improvement in Call Centre for receiving emergency calls and Emergency Response.

Capacity Building, Talent and Human Resource Development

In the year 2017-18, an extensive exercise by external HR Consultant) was undertaken to identify SSGC's employees core competencies (skills and behaviors) as part of Potential Assessment. The competencies (including leadership competencies) were then identified for each grade and later presented and approved by COED. Subsequently, a comprehensive SSGC Competency Framework" was finalized for developing a robust Annual Training & Development Plan for SSGC employees for the year 2018-19 and beyond. Last year, extensive technical and soft skills trainings were conducted at LDC. For the next year, the Competency based training shall continue based on training need analysis process will be reviewed by HR and concern divisions. The effective utilization of training by individuals will be monitored and will be reflected in their annual appraisal. In the year 2018-19 a total of 341 trainings were conducted for 8,700 employees translating into 8,305 Training man-days.

Job rotation policy (including cross functional) will be implemented across the board at the junior / middle and senior management. This would lead to employee exposure, career progression and talent / skill development.

To fill the current gap of skilled workers and supervisors, requirements have been obtained from concern departments / division and process is underway to hire required qualified Diploma holders, experienced and skill workers from the market on fast track.

The mechanism is developed to issue advisory notes / explanations / show causes to the nonperformers after review of performance on monthly and quarterly basis. Viz a viz appreciation letters to good performers will also be issued and accordingly performance will be reflected in PMS / annual reviews.

Organizational Restructuring

In order to strengthen Management efforts to curb and reduce UFG to achieve the desired targets, two senior level separate groups are established. The scope of the work is defined with authority and responsibility. Following are the details:

1. Implementation Group under the chairmanship of SGM (UFG), responsible for implementing UFG reduction strategy on weekly basis.
2. Strategic Group under the chairmanship of Managing Director, responsible to monitor activity of UFG through UFG implantation groups on monthly basis.

Both of the above teams have defined TOR and specific KPIs and strict monitoring would be done against these targets.

Supply Chain

Improve the efficiencies of the procurement cycle as approved by the Board.

Material Control Unit is established at Karachi under the control of GMI (D)-South. Unit will be further strengthened with required manpower with access to inventory and procurement ERP system for better and efficient material planning.

List of UFG related Critical Items are to be prepared by Material Control Unit in consultation with User and Store department so that same can be procured on urgent mode with realistic delivery time.

Stock Requisition will be prepared by the Store department for processing and will be tagged, for example UFG related Procurement (UFGRP) for easy Monitoring & Visibility on the system.

The UFGRP Requisition will be signed by the Incharge MCU and will be forwarded to Procurement Department for further processing and tagged with "Urgent" procurement.

The Tendering process will be initiated by Procurement Department in week time including the publication and will give response time as per PPRA Rule 13, i.e. 15 Days for Local and 30 Days for Foreign purchase.

After bid opening, file will be sent to user department for technical evaluation within three days.

User department ensure Technical Evaluation within ten days and return back to procurement department for commercial evaluation.

Commercial Evaluation Report will be prepared by procurement department in three days, side by side MIS will also be updated by the procurement department.

Procurement department will ensure approval of ER from approving authorities in a week time.

After Approval of ER, the announcement will be uploaded on SSGC website by procurement department in two day & PO will be issued within the time frame given by PPRA.

Procurement department will ensure deliveries of supplies in Store within the time frame including the clearing of consignment from port in case of foreign material.

The goods once delivered i.e. foreign or Local, Store department will inform user department for physical inspections of material in two days and user department will ensure inspection in three days for normal item.

The MIS which will be developed in parallel to activities will give visibility & status of material as and when required.

Integrity of the network

Monitoring of CP Stations

The CP System is designed to enhance CP level of the steel pipeline network in the area as per NACE criteria of minimum -0.85 volts at remote end, by adding new CP Stations as well as renovation of Ground Beds for obtaining desirable output.

Monitoring of CP stations is major CP activity to ensure that the CP Stations are in operation and providing required CP cover to the underground pipeline network. At present there are 459 CP stations in operation in Distribution North & South and are scheduled to monitor each and every CP Station once in a month by CP Teams, rectifications / repair & maintenance are part of monitoring system.

Monthly MIS will be generated by the Incharge CP based on CP potential survey, CIP survey and bell hole inspections reports of different segments, remedial actions and maintenance work carried out.

Coating Refurbishment

The Pipeline coating refurbishment is one of the most important KPI as coating is considered the first line of defence against corrosion. Coating refurbishments will be planned on the basis of CP Potential surveys, CIP Surveys and bell-hole Inspection survey to identify damaged coating spots and repairs will be carried out immediately by CP

CP Department has planned to refurbish 8 KMs old/ depleted coatings of the pipelines of Distribution North & South where accessible. The budget for the Services & Material has been approved and the tenders have been floated.

Installation of CP stations

Due to aging of the coating and the pipelines, there is need to refurbish the coating of old pipelines, but due to limitations such as no ROWs in city areas, road cutting expenses / permissions, depth of pipelines due to many layers of road constructions and encroachments, it is not feasible to carry out refurbishments, the number of CP Stations will be planned to meet the current requirements of the pipeline for CP.

In financial year 2019-20 CP Stations in Distribution North & South has planned to install 23 new CP Station to bridge the gap between the CP current supply & demand of Pipeline network.

On the basis of potential survey budget provision will be kept for new CP Stations during this financial year to cover CP of 100% steel distribution network in next financial year.

Ground Bed Renewal

All CP Stations will be checked thoroughly on monthly basis and accordingly the replacement of Ground beds / anode beds will be arranged, during this financial year around 39 ground beds will be replaced.

Installation of Sacrificial Anodes

The Magnesium Anodes will be installed at low PSP areas as well as at newly constructed pipelines projects in Distribution North & South to provide Cathodic Protection until the impressed current system is commissioned. The target of 700 Magnesium anodes installation has been set in 2019-20 and activity/ job would be carried out through outsource under the supervision of CP Department.

Inspection through 3rd party

For assessment of the state of the existing network, equipment, standards and procedures, it is planned to hire a consultant for third-party inspection.

Technical Audit

UFG department has been given responsibly to monitor and conduct technical audit on quarterly basis at Regional / Zonal and Sub Zonal level against the work done and the results achieved.

The frequency of Internal Technical Audit will be increased and bi-annually audits will be ensured.

A proposal is under preparation for performing technical audit through third party inspectors on Bi-yearly basis.

Big ticket items

- Domestic meter replacement.
- Theft control in all sectors.
- Pipeline surveys for underground leak and rectifications.
- Rehabilitation of network.

Measurement Methodology of UFG savings

Domestic meter replacement

This directly affects the sales through recovery of volumes. The average minimum estimated volumes per month are as follows:

- a. PUG meter replacement : 70 cm per meter/month
- b. Scheduled aging meter replacement /minimum billing : 15 cm per meter/month

Theft Control

This directly affects the purchases and also the sales if unregistered customers are brought under the billing umbrella. Also, recovery against tampered meters affect the sales.

- a. Industrial customer : actual, based on connected load
- b. Commercial customer : actual, based on connected load
- c. Domestic customer : 70 cm per meter/month
: (based on actual average sale per customer)

Pipeline surveys for underground leaks and rectifications

This directly affects the loss of gas through the network and reflected in purchase. Following is the volume yields which are estimated on the basis of pilot studies.

- a. Underground leak saving calculations : 0.176 mcf / leak
- b. Overhead leak saving calculation : 0.002 mcf / connection

Rehabilitation of network

This directly affects the loss of gas from the network. Following is the volume yields which are estimated on the basis of pilot studies:

- a. Rehabilitation of leaking pipelines, inclusive of meter replacement : 6.4 mcf / km

Physical Targets and UFG savings FY 2019-2020

		Karachi	Sindh	Balochistan	Company
Targets Planned	Unit	2019 – 20	2019 – 20	2019 – 20	2019 – 20
Network Segmentation	Nos.	60	50	10	120
Rehabilitation	KMs	200	150	50	400
U/G Leak Survey & Repairs	KMs	6,000	15,000	1,500	22,500
O/H Leak Survey & Repairs	Nos.	625,000	450,000	200,000	1,275,000
Meter Replacement (Dom)	Nos.	336,100	93,300	64,400	493,800
Theft Detection (Domestic)	Nos.	154,200	76,900	51,000	282,100
Theft Detection (Ind & Com)	Nos.	1,056	422	633	2,111
Theft Detection (Unregistered)	Nos.	528	211	317	1,056
Detailed Survey (Industrial)	Nos.	750	180	40	970
Industrial Meters Proving	Nos.	1,635	340	70	2,045

Estimated Additional Savings	Unit	2019 – 20	2019 – 20	2019 – 20	2019 – 20
Rehabilitation	MMCF	234	175	58	467
U/G Leak Survey & Repairs	MMCF	193	482	48	723
Overhead Leak Survey & Repairs	MMCF	228	164	73	465
Meter Replacement – PUG (Dom)	MMCF	4,135	1,148	792	6,075
Theft Detection (Domestic)	MMCF	2,700	1,360	4,345	8,405
Detailed Survey (Industrial)	MMCF	750	180	40	970
Industrial Meters Proving	MMCF	1,635	340	70	2,045
Total	MMCF	9,874	3,849	5,427	19,150

Total Purchase	300,417	89,835	53,103	443,355
Total Sale	263,407	77,443	29,255	370,105
UFG (MMCF)	37,010	12,392	23,848	73,250
UFG (%)	12.32%	13.79%	44.91%	16.50%
UFG Savings	10,535	3,240	5,375	19,150
UFG (MMCF)	26,475	9,152	18,473	54,100
UFG (%)	8.81%	10.19%	34.79%	12.20%

Meter replacement is enhanced to 750,000. This figure includes the pending replacement of sticky meters volume already booked in the previous years.

Summary of budget requirements

Particulars	Unit	Total Budget required for UFG Control Strategy		Approved Budget		Net Additional Requirement
		Physical Targets	Rs. Million	Physical Targets	Rs. Million	Rs. Million
I) CAPITAL BUDGET						
A) Gas Distribution Network						
Network Segmentation	Nos	120	480	47	200	280
Rehabilitation of old leaking Pipelines	KMs	400	1,156	762	1,267	(111)
Defected Meters Replacement (Domestic)	Nos	750,000	2,322	324,000	1,002	1,320
Defected Meters Replacement (Commercial)	Nos	3,500	354	2,572	296	58
Defected Meters Replacement (Industrial)	Nos	1,305	1,973	360	446	1,527
Measuring Modules		4	313	-	-	313
EVCs / TOCs	Nos	1,600	672	690	169	503
Total Gas Distribution Network - A			7,270		3,380	3,890
B) Other Normal Capital Budget						
Smart Metering and GCV Management	Nos	7,500	975	7,500	975	-
V3 Compatible index	Nos	100,000	800	-	-	800
CP Stations (Transformer Rectifiers)		17	6	-	-	6
Other Assets		-	1,080	-	202	878
Total Other Normal Capital Budget – B			2,861		1,177	1,684
Total Capital Budget (A +B)			10,131		4,557	5,574
REVENUE BUDGET						
Underground Leaks Survey & Repairs	KMs	22,500	188	3,799	37	151
Overhead Leaks Survey & Repairs	Nos	1,275,000	884	268,750	215	669
Other Revenue Expenditure		-	3,319	-	2,370	949
Total Revenue Budget			4,391	-	2,622	1,769
Total Capital and Revenue Budget			14,522	-	7,179	7,343

A

Table # A-1

SUI SOUTHERN GAS COMPANY LIMITED
REVIEW PETITION
FOR ESTIMATED REVENUE REQUIREMENT
FY 2019-20

Working for Tariff Adjustment Required

S.No.	DESCRIPTION	Determination ERR FY 2019-20 dt-17-05-2019	Review Petition ERR FY 2019-20	Variance Inc./ (Dec.)	S.No.
1	ENERGY SALES (MMMBTU)	356,872	362,668		1
2				Rs Million	2
3	<u>REVENUES:</u>				3
4	Gross Sales - net of GST	206,261.213	271,989.514	65,728.301	4
5	Gas development surcharge	(56,986.197)	4,891.600	61,877.797	5
6	Net Gas Sales Revenues	263,247.410	267,097.914	3,850.504	6
7	Other Operating Revenues	7,528.756	7,524.756	(4.000)	7
8	Total revenues A	270,776.166	274,622.670	3,846.504	8
9					9
10	<u>EXPENSES:</u>				10
11	Cost of gas	236,551.246	248,782.044	12,230.798	11
12	Adjustment for UFG above benchmark	(19,277.748)	(750.000)	18,527.748	12
13	UFG adjustments on RLNG volume handled basis (ring fenced)	-	(9,665.131)	(9,665.131)	13
14	Transmission and distribution cost	17,306.085	21,780.914	4,474.829	14
15	Depreciation	5,505.723	5,825.583	319.860	15
16	Other Operating Expenses	1,545.939	1,545.939	0.000	16
17	Total expenses B	241,631.245	267,519.349	25,888.104	17
18				-	18
19	Operating profit / (Loss) C = A - B	29,144.921	7,103.321	(22,041.600)	19
20	Amount of return required D	6,693.031	7,325.767	632.736	20
21	Shortfall in operating profit over return required E = D - C	(22,451.890)	222.446	22,674.336	21
22	Subsidy for LPG Air Mix Projects over & above Gas Operation	1,190.657	1,190.657	-	22
23	Staggering of Financial Impact on account of SHC Order	(3,671.767)	(3,671.767)	-	23
24	Shortfall related to prior years	24,933.000	24,933.000	-	24
25	Total Shortfall in Revenue Requirement	0.000	22,674.336	22,674.336	25
26	Rs. Per MMBTU - 1st Jul. 2019	-	62.52	62.52	26

B

SUI SOUTHERN GAS COMPANY LIMITED
 REVIEW PETITION
 FOR ESTIMATED REVENUE REQUIREMENT
 FY 2019-20
 INDEX - SECTION - B

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Note: * Not being forwarded as unchanged.

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF FIELD WISE GAS PURCHASES

VOLUME IN MMCF

S.No.	CATEGORY	Determination ERR FY 2019-20	Review Petition ERR FY 2019-20	Variance Inc./(Dec.) over Determination FY 2019-20		S.No.
					%	
1	Sui	39,162	39,451	289	0.7	1
2	Kandhkot	-	91	91	100.0	2
3	Badin Block	17,990	16,878	(1,112)	(6.2)	3
4	Kadanwari	17,144	16,499	(645)	(3.8)	4
5	Miano	9,673	9,691	18	0.2	5
6	Zamzama	4,395	4,199	(196)	(4.5)	6
7	Bhit	42,860	43,160	300	0.7	7
8	Mari	-	58	58	100.0	8
9	Sari / Hundi	366	367	1	0.3	9
10	Mazarani	855	884	29	3.3	10
11	Sawan	9,671	8,477	(1,194)	(12.3)	11
12	Khipro Block - Naimat Basal	101,880	95,357	(6,523)	(6.4)	12
13	Mirpurkhas Block - Kausar	24,434	28,445	4,011	16.4	13
14	Zargoan	4,181	4,199	18	0.4	14
15	Sinjhoro	11,075	10,719	(356)	(3.2)	15
16	Bobi	732	791	59	8.1	16
17	Maher / Mubarak Block	4,486	4,395	(91)	(2.0)	17
18	Pasaki Deep & Kunnar Deep	69,095	66,117	(2,978)	(4.3)	18
19	Adam X-1 / Hala	4,943	4,876	(67)	(1.3)	19
20	Pakhro / Noorai Jagir	2,289	2,225	(64)	(2.8)	20
21	Hassan / SNGPL Towns - (Ghotki, Rustam, SherAli, Ubaro, etc.)		244	244	100.0	21
22	Latif	3,998	4,379	381	9.5	22
23	Kirther (Rehman)-EWT	12,810	12,735	(75)	(0.6)	23
24	Nur Bagla fields	1,587	1,423	(164)	(10.3)	24
25	Jakhro / Dachrapur / Gopang	-	169	169	100.0	25
26	Gambat Block - Wafiq/Shahdad-(XI)	25,512	25,933	421	1.6	26
27	Sujawal / Sujjal	5,766	5,634	(132)	(2.3)	27
28	Lakhu Langri		2	2	100.0	28
29	Aqeeq-1	-	125	125	100.0	29
30	Bitrism		289	289	100.0	30
31	Mitha		522	522	100.0	31
32		414,904	408,332	(6,572)	(1.5)	32

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF FIELD WISE GAS PURCHASES

VOLUME IN MMCFD

S.No.	CATEGORY	Determination ERR FY 2019-20	Review Petition ERR FY 2019-20	Variance Inc./(Dec.) over Determination FY 2019-20	S.No.
				%	
1	Sui	107.00	107.79	(1) (1.4)	1
2	Kandhkot	-	0.25	(2) (100.0)	2
3	Badin Block	49.15	46.11	21 75.5	3
4	Kadanwari	46.84	45.08	37 368.4	4
5	Miano	26.43	26.48	(2) (5.6)	5
6	Zamzama	12.01	11.47	(13) (52.0)	6
7	Bhit	117.10	117.92	2 1.8	7
8	Mari	-	0.16	(1) (100.0)	8
9	Sari / Hundi	1.00	1.00	- -	9
10	Mazarani	2.34	2.41	(1) (22.1)	10
11	Sawan	26.42	23.16	(19) (41.3)	11
12	Khipro Block - Naimat Basal	278.36	260.54	(27) (8.7)	12
13	Mirpurkhas Block - Kausar	66.76	77.72	(33) (33.2)	13
14	Zargoan	11.42	11.47	(3) (18.4)	14
15	Sinjhoro	30.26	29.29	4 16.4	15
16	Bobi	2.00	2.16	- -	16
17	Mahier / Mubarak Block	12.26	12.01	5 63.4	17
18	Pasaki Deep & Kunnar Deep	188.78	180.65	123 188.2	18
19	Adam X-1 / Hala	13.51	13.32	8 145.6	19
20	Pakhro / Noorai Jagir	6.25	6.08	4 212.7	20
21	Hassan / SNGPL Towns - (Ghotki, Rustam, SherAli, Ubaro, etc.)	-	0.67	-	21
22	Latif	10.92	11.96	(1) (5.0)	22
23	Kirther (Rehman)-EWT	35.00	34.79	2 6.1	23
24	Nur Bagla fields	4.34	3.89	3 333.6	24
25	Jakhro / Dachrapur / Gopang	-	0.46	(3) (100.0)	25
26	Gambat Block - Wafiq/Shahdad-(XI)	69.70	70.85	39 128.5	26
27	Sujawal / Sujjal	15.75	15.39	(5) (25.0)	27
28	Lakhu Langri	-	0.01	- 100.0	28
29	Aqeeq-I	-	0.34	(2) (100.0)	29
30	Bitrism	-	0.79	- 100.0	30
31	Mitha	-	1.43	- 100.0	31
32		1,133.6	1,115.7	(40.6) (3.5)	32

Table # B-1.3

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF FIELD WISE GAS PURCHASES

ENERGY IN MMMBTU

S.No.	CATEGORY	Determination ERR FY 2019-20	Review Petition ERR FY 2019-20	Variance Inc./(Dec.) over Determination FY 2019-20		S.No.
					%	
1	Sui	37,517	37,795	278	0.7	1
2	Kandhkot	-	75	75	100.0	2
3	Badin Block	18,008	17,049	(959)	(5.3)	3
4	Kadanwari	17,127	16,491	(636)	(3.7)	4
5	Miano	9,663	9,688	25	0.3	5
6	Zamzama	3,507	3,350	(157)	(4.5)	6
7	Bhit	40,288	40,735	447	1.1	7
8	Mari	-	42	42	100.0	8
9	Sari / Hundi	314	319	5	1.7	9
10	Mazarani	870	900	29	3.4	10
11	Sawan	9,681	8,489	(1,191)	(12.3)	11
12	Khipro Block - Naimat Basal	100,861	93,061	(7,801)	(7.7)	12
13	Mirpurkhas Block - Kausar	25,411	30,381	4,969	19.6	13
14	Zargoan	3,972	3,990	18	0.4	14
15	Sinjhoro	11,208	10,878	(329)	(2.9)	15
16	Bobi	813	884	71	8.7	16
17	Maher / Mubarak Block	4,831	4,733	(98)	(2.0)	17
18	Pasaki Deep & Kunnar Deep	71,168	68,110	(3,058)	(4.3)	18
19	Adam X-1 / Hala	5,141	5,066	(75)	(1.5)	19
20	Pakhro / Noorai Jagir	2,587	2,536	(51)	(2.0)	20
21	Hassan / SNGPL Towns - (Ghotki, Rustam, SherAli, Ubaro, etc.)		211	211	100.0	21
22	Latif	4,002	4,390	388	9.7	22
23	Kirther (Rehman)-EWT	11,247	11,187	(60)	(0.5)	23
24	Nur Bagla fields	1,717	1,538	(179)	(10.4)	24
25	Jakhro / Dachrapur / Gopang	-	190	190	100.0	25
26	Gambat Block - Wafiq/Shahdad-(XI)	24,236	24,627	391	1.6	26
27	Sujawal / Sujjal	6,095	5,949	(146)	(2.4)	27
28	Lakhu Langri		2	2	100.0	28
29	Aqeeq-1	-	131	131	100.0	29
30	Bitrism		298	298	100.0	30
31	Mitha		524	524	100.0	31
32		410,266	403,619	(6,646)	(1.6)	32

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF GAS PURCHASES

S.No.	CATEGORY	Determination ERR FY 2019-20 dt:-17-05-2019	Review Petition ERR FY 2019-20	Variance Inc./.(Dec.) Over Dertermination	S.No.
				%	
1	<u>Volume in MMCF</u>				1
2	Gross Purchases	414,904	408,332	(6,572) (1.6)	2
3	Less: Gas Consumed Internally - metered	709	1,332	623 87.9	3
4		414,195	407,001	(7,195) (1.7)	4
5					5
6	<u>Energy in MMBTU</u>				6
7	Gross Purchases	410,266	403,619	(6,646) (1.6)	7
8	Less: Gas Consumed Internally - metered	703	1,321	618 87.9	8
9		409,562	402,298	(7,265) (1.8)	9
10					10
11	<u>Amount in Rupees Million</u>				11
12	Gross Purchases	236,551.246	249,599.253	13,048.007 5.5	12
13	Less: Gas Consumed Internally - metered	405.478	817.209	411.731 101.5	13
14	Net Cost of Gas Purchases (NG)	236,145.767	248,782.044	12,636.276 5.4	14
15					15
16	Average Rate Rs per MMBTU	576.58	618.40	41.82 7.3	16

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF GAS CONSUMED INTERNALLY
AND THIRD PARTY DAMAGES

S.No.	CATEGORY	Determination ERR FY 2019-20 dt:-17-05-2019	Review Petition ERR FY 2019-20	Variance Inc./(Dec.) Review Petition Over Determination		S.No.
1	<u>Energy in MMBTU</u>			-	%	1
2	Compressor Fuel	551.865	1,112.900	561.035	101.7	2
3	LHF Badin	0.072	0.095	0.023	32.2	3
4	Domestic / other use	170.254	225.100	54.846	32.2	4
5	Transmission - total	722.191	1,338.095	615.904	85.3	5
6	Distribution - total	4.248	370.613	366.365		6
7	Total	726.439	1,708.708	982.268	135.2	7
8	Gas Consumed Internally - metered	703.246	1,321.484	618.238	87.9	8
9	Gas Consumed Internally - un-metered	24.402	24.467	0.066	0.3	9
10		727.648	1,345.951	618.303	85.0	10
11	Third Party Damages - un-metered	362.756	362.756	-	-	11
12	Gross Gas Consumed Internally	1,090.404	1,708.708	618.303	56.7	12
13	Less: Non-Admissible (un-metered)	387.158	387.223	0.066	0.0	13
14	Net Gas Consumed Internally (metered)	703.246	1,321.484	618.238	87.9	14
15						15
16	<u>Average Rate - Rs per MMBTU</u>	576.58	618.40	41.822	7.3	16
17						17
18	<u>Cost of Gas Consumed Internally - Rs Million</u>					18
19	Compressor Fuel	318.195	688.220	370.026	116.3	19
20	LHF Badin	0.041	0.059	0.017		20
21	Domestic / other use	98.165	139.202	41.037	41.8	21
22	Transmission - total	416.402	827.482	411.080	98.7	22
23	Distribution - total	2.449	229.188	226.739		23
24	Total	418.851	1,056.669	637.819	152.3	24
25	Gas Consumed Internally - metered	405.478	817.209	411.731	101.5	25
26	Gas Consumed Internally - un-metered	14.069	15.131	1.061	7.5	26
27		419.548	832.340	412.792	98.4	27
28	Third Party Damages - un-metered	209.158	224.329	15.171	7.3	28
29	Gross Gas Consumed Internally	628.706	1,056.669	427.963	68.1	29
30	Less: Non-Admissible (un-metered)	223.228	239.460	16.232	7.3	30
31	Net Gas Consumed Internally (metered)	405.478	817.209	411.731	101.5	31

Table # B-2.1

SUI SOUTHERN GAS COMPANY LIMITED

STATEMENT OF GAS SALES

VOLUME IN MMCF

S.No.	CATEGORY	Determination ERR FY 2019-20 (17-05-2019)	Review Petition ERR FY 2019-20	Variance Inc./(Dec.) over Determination FY 2019-20	S.No.
				%	
1	POWER	49,643	48,756	(886) (1.8)	1
2	HABIBULLAH COASTAL POWER	7,735	7,116	(619) (8.0)	2
3	CEMENT	411	387	(25) (6.0)	3
4	FERTILIZER - FEEDSTOCK	18,830	18,790	(40) (0.2)	4
5	CNG STATIONS	26,356	25,163	(1,193) (4.5)	5
6	CAPTIVE POWER	29,395	28,833	(562) (1.9)	6
7	CAPTIVE POWER (Zero-rated)	37,440	41,444	4,004 10.7	7
8	INDUSTRIAL (Zero-rated)	22,842	26,415	3,574 15.6	8
9	NOORIABAD POWER PLANT	-	7,123	7,123 100.0	9
10	GENERAL INDUSTRIES	37,152	35,257	(1,895) (5.1)	10
11	COMMERCIAL	10,838	10,595	(243) (2.2)	11
12	DOMESTIC	108,423	105,484	(2,939) (2.7)	12
13	TOTAL	349,064	355,363	6,299 1.8	13

Table # B-2.2

SUI SOUTHERN GAS COMPANY LIMITED

STATEMENT OF GAS SALES

VOLUME IN MMCF

S.No.	CATEGORY	Determination ERR FY 2019-20 (17-05-2019)	Review Petition ERR FY 2019-20	Variance Inc./(Dec.) over Determination FY 2019-20	S.No.
				%	
1	(A) KARACHI				1
2	TOTAL INDUSTRIAL	173,552	177,637	4,085	2.4
3	POWER - KESC	39,596	39,385	(212)	(0.5)
4	CEMENT	407	381	(27)	(6.6)
5	FERTILIZER - Feedstock	18,830	18,790	(40)	(0.2)
6	FERTILIZER - Power	1,082	776	(306)	(28.3)
7	PAK STEEL	736	742	6	0.8
8	CNG STATIONS	14,809	14,148	(661)	(4.5)
9	CAPTIVE POWER	19,073	18,689	(384)	(2.0)
10	CAPTIVE POWER (Zero-rated)	25,665	29,239	3,574	13.9
11	INDUSTRIAL (Zero-rated)	22,543	26,066	3,523	15.6
12	GENERAL INDUSTRIES	30,811	29,422	(1,389)	(4.5)
13					13
14	COMMERCIAL	8,082	7,895	(188)	(2.3)
15	DOMESTIC	66,100	64,103	(1,997)	(3.0)
16	SUB TOTAL 'A'	247,734	249,635	1,900	0.8
17					17
18	(B) SINDH EXCLUDING KARACHI				18
19	TOTAL INDUSTRIAL	46,952	53,073	6,121	13.0
20	POWER - WAPDA	10,046	9,372	(674)	(6.7)
21	NOORIABAD POWER PLANT	-	7,123	7,123	100.0
22	CEMENT	4	6	2	50.3
23	CNG STATIONS	10,425	9,998	(427)	(4.1)
24	CAPTIVE POWER	10,309	10,130	(179)	(1.7)
25	CAPTIVE POWER (Zero-rated)	11,775	12,205	430	3.7
26	INDUSTRIAL (Zero-rated)	299	349	50	16.9
27	GENERAL INDUSTRIES	4,093	3,889	(204)	(5.0)
28					28
29	COMMERCIAL	1,684	1,647	(37)	(2.2)
30	DOMESTIC	27,542	26,407	(1,135)	(4.1)
31	SUB TOTAL 'B'	76,178	81,127	4,949	6.5
32					32
33	(C) BALOCHISTAN				33
34	TOTAL INDUSTRIAL	9,299	8,574	(725)	(7.8)
35	POWER - WAPDA	-	(0)	(0)	100.0
36	HABIBULLAH COASTAL POWER	7,735	7,116	(619)	(8.0)
37	CNG STATIONS	1,122	1,017	(105)	(9.3)
38	CAPTIVE POWER	12	13	1	7.9
39	GENERAL INDUSTRIES	430	427	(3)	(0.7)
40					40
41	COMMERCIAL	1,072	1,054	(18)	(1.7)
42	DOMESTIC	14,781	14,974	193	1.3
43	SUB TOTAL 'C'	25,152	24,602	(550)	(2.2)
44	TOTAL SALES (A+B+C+D)	349,064	355,363	6,299	1.8

Table # B-2.3

SUI SOUTHERN GAS COMPANY LIMITED

STATEMENT OF GAS SALES

VOLUME IN MMCFD

S.No.	CATEGORY	Determination ERR FY 2019-20 (17-05-2019)	Review Petition ERR FY 2019-20	Variance Inc./(Dec.) over Determination FY 2019-20		S.No.
					%	
1	POWER	135.6	133.2	(2.4)	(1.8)	1
2	HABIBULLAH COASTAL POWER	21.1	19.4	(1.7)	(8.0)	2
3	CEMENT	1.1	1.1	(0.1)	(6.0)	3
4	FERTILIZER - FEEDSTOCK	51.4	51.3	(0.1)	(0.2)	4
5	CNG STATIONS	72.0	68.8	(3.3)	(4.5)	5
6	CAPTIVE POWER	80.3	78.8	(1.5)	(1.9)	6
7	CAPTIVE POWER (Zero-rated)	102.3	113.2	10.9	10.7	7
8	INDUSTRIAL (Zero-rated)	62.4	72.2	9.8	15.6	8
9	NOORIABAD POWER PLANT	-	19.5	19.5	100.0	9
10	GENERAL INDUSTRIES	101.5	96.3	(5.2)	(5.1)	10
11	COMMERCIAL	29.6	28.9	(0.7)	(2.2)	11
12	DOMESTIC	296.2	288.2	(8.0)	(2.7)	12
13	TOTAL	953.7	970.9	17.2	1.8	13

Table #B-2.4

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF GAS SALES

VOLUME IN MMCFD

S.No.	CATEGORY	Determination ERR FY 2019-20 (17-05-2019)	Review Petition ERR FY 2019-20	Variance Inc./ (Dec.) over Determination FY 2019-20	S.No.
1	<u>(A) KARACHI</u>				1
2	<u>TOTAL INDUSTRIAL</u>	474.2	485.3	11.2 2.4	2
3	POWER - KESC	108.2	107.6	(0.6) (0.5)	3
4	CEMENT	1.1	1.0	(0.1) (6.6)	4
5	FERTILIZER - Feedstock	51.4	51.3	(0.1) (0.2)	5
6	FERTILIZER - Power	3.0	2.1	(0.8) (28.3)	6
7	PAK STEEL	2.0	2.0	0.0 0.8	7
8	CNG STATIONS	40.5	38.7	(1.8) (4.5)	8
9	CAPTIVE POWER	52.1	51.1	(1.0) (2.0)	9
10	CAPTIVE POWER (Zero-rated)	70.1	79.9	9.8 13.9	10
11	INDUSTRIAL (Zero-rated)	61.6	71.2	9.6 15.6	11
12	GENERAL INDUSTRIES	84.2	80.4	(3.8) (4.5)	12
13					13
14	COMMERCIAL	22.1	21.6	(0.5) (2.3)	14
15	DOMESTIC	180.6	175.1	(5.5) (3.0)	15
16	SUB TOTAL 'A'	676.9	682.1	5.2 0.8	16
17					17
18	<u>(B) SINDH EXCLUDING KARACHI</u>				18
19	<u>TOTAL INDUSTRIAL</u>	128.3	145.0	16.7 13.0	19
20	POWER - WAPDA	27.4	25.6	(1.8) (6.7)	20
21	NOORABAD POWER PLANT	-	19.5	19.5 100.0	21
22	CEMENT	0.0	0.0	0.0 50.3	22
23	CNG STATIONS	28.5	27.3	(1.2) (4.1)	23
24	CAPTIVE POWER	28.2	27.7	(0.5) (1.7)	24
25	CAPTIVE POWER (Zero-rated)	32.2	33.3	1.2 3.7	25
26	INDUSTRIAL (Zero-rated)	0.8	1.0	0.1 16.9	26
27	GENERAL INDUSTRIES	11.2	10.6	(0.6) (5.0)	27
28		-	-		28
29	COMMERCIAL	4.6	4.5	(0.1) (2.2)	29
30	DOMESTIC	75.3	72.2	(3.1) (4.1)	30
31	SUB TOTAL 'B'	208.1	221.7	13.5 6.5	31
32					32
33	<u>(C) BALOCHISTAN</u>				33
34	<u>TOTAL INDUSTRIAL</u>	25.4	23.4	(2.0) (7.8)	34
35	POWER - WAPDA	-	(0.0)	(0.0) 100.0	35
36	HABIBULLAH COASTAL POWER	21.1	19.4	(1.7) (8.0)	36
37	CNG STATIONS	3.1	2.8	(0.3) (9.3)	37
38	CAPTIVE POWER	0.0	0.0	0.0 7.9	38
39	GENERAL INDUSTRIES	1.2	1.2	(0.0) (0.7)	39
40		-	-		40
41	COMMERCIAL	2.9	2.9	(0.0) (1.7)	41
42	DOMESTIC	40.4	40.9	0.5 1.3	42
43	SUB TOTAL 'C'	68.7	67.2	(1.5) (2.2)	43
44	TOTAL SALES (A+B+C+D)	953.7	970.9	17.2 1.8	44

Table # B-2.5

SUI SOUTHERN GAS COMPANY LIMITED

STATEMENT OF GAS SALES

ENERGY IN MMMBTU

S.No.	CATEGORY	Determination ERR FY 2019-20 (17-05-2019)	Review Petition ERR FY 2019-20	Variance Inc./ (Dec.) over Determination FY 2019-20	S.No.
				%	
1	POWER	51,998	50,922	(1,076) (2.1)	1
2	HABIBULLAH COASTAL POWER	7,448	6,854	(594) (8.0)	2
3	CEMENT	417	390	(26) (6.3)	3
4	FERTILIZER - FEEDSTOCK	19,893	19,822	(72) (0.4)	4
5	CNG STATIONS	26,777	25,524	(1,253) (4.7)	5
6	CAPTIVE POWER	29,970	29,368	(602) (2.0)	6
7	CAPTIVE POWER (Zero-rated)	38,224	42,187	3,964 10.4	7
8	INDUSTRIAL (Zero-rated)	23,467	27,087	3,620 15.4	8
9	NOORIABAD POWER PLANT	-	7,256	7,256 100.0	9
10	GENERAL INDUSTRIES	38,052	36,034	(2,019) (5.3)	10
11	COMMERCIAL	10,992	10,721	(271) (2.5)	11
12	DOMESTIC	109,634	106,503	(3,130) (2.9)	12
13	TOTAL	356,872	362,668	5,796 1.6	13

Table # B-2.6

SUI SOUTHERN GAS COMPANY LIMITED

STATEMENT OF GAS SALES

ENERGY IN MMMBTU

S.No.	CATEGORY	Determination ERR FY 2019-20 (17-05-2019)	Review Petition ERR FY 2019-20	Variance Inc./ (Dec.) over Determination FY 2019-20	S.No.
1	(A) KARACHI				1
2	<u>TOTAL INDUSTRIAL</u>	180,052	183,841	3,789 2.1	2
3	POWER - KESC	41,644	41,303	(341) (0.8)	3
4	CEMENT	413	384	(28) (6.8)	4
5	FERTILIZER - Feedstock	19,893	19,822	(72) (0.4)	5
6	FERTILIZER - Power	1,142	818	(323) (28.3)	6
7	PAK STEEL	750	753	3 0.4	7
8	CNG STATIONS	15,174	14,463	(712) (4.7)	8
9	CAPTIVE POWER	19,697	19,270	(426) (2.2)	9
10	CAPTIVE POWER (Zero-rated)	26,504	30,105	3,601 13.6	10
11	INDUSTRIAL (Zero-rated)	23,169	26,744	3,575 15.4	11
12	GENERAL INDUSTRIES	31,667	30,179	(1,488) (4.7)	12
13					13
14	COMMERCIAL	8,277	8,063	(213) (2.6)	14
15	DOMESTIC	67,849	65,676	(2,173) (3.2)	15
16	SUB TOTAL 'A'	256,178	257,580	1,402 0.5	16
17					17
18	(B) SINDH EXCLUDING KARACHI				18
19	<u>TOTAL INDUSTRIAL</u>	47,240	53,345	6,105 12.9	19
20	POWER - WAPDA	10,354	9,619	(735) (7.1)	20
21	NOORIABAD POWER PLANT	-	7,256	7,256 100.0	21
22	CEMENT	4	6	2 50.3	22
23	CNG STATIONS	10,523	10,083	(441) (4.2)	23
24	CAPTIVE POWER	10,261	10,084	(177) (1.7)	24
25	CAPTIVE POWER (Zero-rated)	11,720	12,082	362 3.1	25
26	INDUSTRIAL (Zero-rated)	298	343	46 15.3	26
27	GENERAL INDUSTRIES	4,080	3,872	(207) (5.1)	27
28					28
29	COMMERCIAL	1,684	1,643	(40) (2.4)	29
30	DOMESTIC	27,563	26,413	(1,150) (4.2)	30
31	SUB TOTAL 'B'	76,487	81,402	4,915 6.4	31
32					32
33	(C) BALOCHISTAN				33
34	<u>TOTAL INDUSTRIAL</u>	8,953	8,257	(696) (7.8)	34
35	POWER - WAPDA	-	0	0 100.0	35
36	HABIBULLAH COASTAL POWER	7,448	6,854	(594) (8.0)	36
37	CNG STATIONS	1,079	979	(101) (9.3)	37
38	CAPTIVE POWER	12	13	1 7.9	38
39	GENERAL INDUSTRIES	414	411	(2) (0.6)	39
40					40
41	COMMERCIAL	1,032	1,015	(17) (1.6)	41
42	DOMESTIC	14,221	14,414	193 1.4	42
43	SUB TOTAL 'C'	24,206	23,686	(520) (2.1)	43
44	TOTAL SALES (A+B+C+D)	356,872	362,668	5,796 1.6	44

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF GAS SALES

Rupees Million

S.No.	CATEGORY	Determination ERR FY 2019-20 (17-05-2019)	Review Petition ERR FY 2019-20	Variance Inc./(Dec.) over Determination FY 2019-20		S.No.
					%	
1	POWER	32,706.715	41,959.757	9,253.042	28.3	1
2	HABIBULLAH COASTAL POWER	4,684.957	5,647.967	963.010	20.6	2
3	CEMENT	406.165	498.657	92.492	22.8	3
4	FERTILIZER - FEEDSTOCK	3,680.291	5,946.541	2,266.250	61.6	4
5	CNG STATIONS	26,241.447	32,747.073	6,505.626	24.8	5
6	CAPTIVE POWER	23,376.348	29,984.232	6,607.885	28.3	6
7	CAPTIVE POWER (Zero-rated)	22,934.255	33,159.222	10,224.967	44.6	7
8	INDUSTRIAL (Zero-rated)	14,080.130	21,290.449	7,210.320	51.2	8
9	NOORIABAD POWER PLANT	-	5,978.591	5,978.591	100.0	9
10	GENERAL INDUSTRIES	29,680.801	36,790.352	7,109.552	24.0	10
11	COMMERCIAL	10,589.429	13,386.998	2,797.569	26.4	11
12	DOMESTIC	37,880.720	45,049.800	7,169.079	18.9	12
13	Decrease in Sales Value and GDS due to Customers in Litigation		(450.124)	(450.124)	100.0	13
14	TOTAL	206,261.257	271,989.514	65,728.257	31.9	14

Table # B-2.8

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF GAS SALES

Rupees Million

S.No.	CATEGORY	Determination ERR FY 2019-20 (17-05-2019)	Review Petition ERR FY 2019-20	Variance Inc./(Dec.) over Determination FY 2019-20	S.No.
1	(A) KARACHI				1
2	TOTAL INDUSTRIAL	116,490.217	155,801.565	39,311.348	2
3	POWER - KESC	26,193.929	34,033.685	7,839.755	3
4	CEMENT	402.198	490.848	88.651	4
5	FERTILIZER - Feedstock	3,680.291	5,946.541	2,266.250	5
6	FERTILIZER - Power	890.442	835.574	(54.869)	6
7	PAK STEEL	585.043	768.822	183.779	7
8	CNG STATIONS	14,870.779	18,555.455	3,684.676	8
9	CAPTIVE POWER	15,363.510	19,675.075	4,311.565	9
10	CAPTIVE POWER (Zero-rated)	15,902.299	23,662.754	7,760.456	10
11	INDUSTRIAL (Zero-rated)	13,901.391	21,020.464	7,119.073	11
12	GENERAL INDUSTRIES	24,700.335	30,812.348	6,112.013	12
13					13
14	COMMERCIAL	7,973.617	10,068.267	2,094.649	14
15	DOMESTIC	23,392.328	27,449.398	4,057.070	15
16	SUB TOTAL 'A'	147,856.163	193,319.230	45,463.068	16
17					17
18	(B) SINDH EXCLUDING KARACHI				18
19	TOTAL INDUSTRIAL	35,226.254	50,864.505	15,638.251	19
20	POWER - WAPDA	6,512.786	7,926.072	1,413.286	20
21	NOORIABAD POWER PLANT	-	5,978.591	5,978.591	21
22	CEMENT	3.967	7.808	3.841	22
23	CNG STATIONS	10,313.022	12,935.912	2,622.890	23
24	CAPTIVE POWER	8,003.524	10,295.999	2,292.475	24
25	CAPTIVE POWER (Zero-rated)	7,031.956	9,496.468	2,464.511	25
26	INDUSTRIAL (Zero-rated)	178.739	269.986	91.246	26
27	GENERAL INDUSTRIES	3,182.260	3,953.670	771.410	27
28					28
29	COMMERCIAL	1,621.841	2,051.673	429.832	29
30	DOMESTIC	9,622.426	10,863.081	1,240.655	30
31	SUB TOTAL 'B'	46,470.521	63,779.259	17,308.738	31
32					32
33	(C) BALOCHISTAN				33
34	TOTAL INDUSTRIAL	6,074.637	7,336.771	1,262.135	34
35	POWER - WAPDA	-	0.000	0.000	35
36	HABIBULLAH COASTAL POWER	4,684.957	5,647.967	963.010	36
37	CNG STATIONS	1,057.646	1,255.706	198.060	37
38	CAPTIVE POWER	9.313	13.158	3.845	38
39	GENERAL INDUSTRIES	322.721	419.940	97.219	39
40					40
41	COMMERCIAL	993.970	1,267.058	273.087	41
42	DOMESTIC	4,865.966	6,737.320	1,871.354	42
43	SUB TOTAL 'C'	11,934.573	15,341.149	3,406.576	43
44	(D) Decrease in Sales Value and GDS due to Customers in Litigation		(450.124)	(450.124)	44
45	TOTAL SALES (A+B+C+D)	206,261.257	271,989.514	65,728.257	45

Table # B-3.1

SUI SOUTHERN GAS COMPANY LIMITED
GAS DEVELOPMENT SURCHARGE

Rupees Million

Rupees Million						
S.No.	CATEGORY	Determination ERR FY 2019-20 (17-05-2019)	Review Petition ERR FY 2019-20	Variance Inc./((Dec.) over Determination FY 2019-20	S.No.	
				%		
1	POWER	(6,607.380)	3,459.134	10,066.514	(152.4)	1
2	HABIBULLAH COASTAL POWER	(946.451)	465.615	1,412.065	(149.2)	2
3	CEMENT	(82.049)	41.017	123.067	(150.0)	3
4	FERTILIZER - FEEDSTOCK	(743.419)	1,538.767	2,282.185	(307.0)	4
5	CNG STATIONS	(5,301.040)	2,680.768	7,981.808	(150.6)	5
6	CAPTIVE POWER	(4,722.322)	2,450.132	7,172.454	(151.9)	6
7	CAPTIVE POWER (Zero-rated)	(4,633.102)	2,733.316	7,366.417	(159.0)	7
8	INDUSTRIAL (Zero-rated)	(2,844.421)	1,754.972	4,599.393	(161.7)	8
9	NOORIABAD POWER PLANT	-	492.871	492.871	100.0	9
10	GENERAL INDUSTRIES	(5,995.902)	3,006.287	9,002.189	(150.1)	10
11	COMMERCIAL	(2,142.180)	969.324	3,111.504	(145.2)	11
12	DOMESTIC	(22,967.648)	(14,250.477)	8,717.171	(38.0)	12
	Decrease in Sales Value and GDS due to Customers in Litigation		(450.124)	(450.124)	100.0	13
14	TOTAL	(56,985.914)	4,891.600	61,877.515	(108.6)	14

Table # B-3.2

SUI SOUTHERN GAS COMPANY LIMITED
GAS DEVELOPMENT SURCHARGE

Rupees Million

S.No.	CATEGORY	Determination ERR FY 2019-20 (17-05-2019)	Review Petition ERR FY 2019-20	Variance Inc./(Dec.) over Determination FY 2019-20	S.No.
1	(A) KARACHI				1
2	TOTAL INDUSTRIAL	(23,532.709)	13,843.727	37,376.436 (158.8)	2
3	POWER - KESC	(5,291.673)	2,805.714	8,097.387 (153.0)	3
4	CEMENT	(81.248)	40.375	121.623 (149.7)	4
5	FERTILIZER - Feedstock	(743.419)	1,538.767	2,282.185 (307.0)	5
6	FERTILIZER - Power	(179.881)	68.278	248.159 (138.0)	6
7	PAK STEEL	(118.186)	62.823	181.010 (153.2)	7
8	CNG STATIONS	(3,004.049)	1,519.002	4,523.051 (150.6)	8
9	CAPTIVE POWER	(3,103.626)	1,607.729	4,711.355 (151.8)	9
10	CAPTIVE POWER (Zero-rated)	(3,212.529)	1,950.521	5,163.051 (160.7)	10
11	INDUSTRIAL (Zero-rated)	(2,808.313)	1,732.717	4,541.030 (161.7)	11
12	GENERAL INDUSTRIES	(4,989.784)	2,517.800	7,507.585 (150.5)	12
13					13
14	COMMERCIAL	(1,613.016)	729.022	2,342.038 (145.2)	14
15	DOMESTIC	(14,214.024)	(9,069.741)	5,144.283 (36.2)	15
16	SUB TOTAL 'A'	(39,359.749)	5,503.008	44,862.757 (114.0)	16
17					17
18	(B) SINDH EXCLUDING KARACHI				18
19	TOTAL INDUSTRIAL	(7,116.197)	4,175.350	11,291.546 (158.7)	19
20	POWER - WAPDA	(1,315.707)	653.420	1,969.127 (149.7)	20
21	NOORABAD POWER PLANT	-	492.871	492.871 100.0	21
22	CEMENT	(0.801)	0.642	1.444 (180.1)	22
23	CNG STATIONS	(2,083.336)	1,058.970	3,142.306 (150.8)	23
24	CAPTIVE POWER	(1,616.814)	841.327	2,458.142 (152.0)	24
25	CAPTIVE POWER (Zero-rated)	(1,420.572)	782.794	2,203.366 (155.1)	25
26	INDUSTRIAL (Zero-rated)	(36.108)	22.255	58.363 (161.6)	26
27	GENERAL INDUSTRIES	(642.857)	323.070	965.928 (150.3)	27
28					28
29	COMMERCIAL	(328.089)	148.557	476.646 (145.3)	29
30	DOMESTIC	(5,774.305)	(3,956.113)	1,818.191 (31.5)	30
31	SUB TOTAL 'B'	(13,218.590)	367.794	13,586.384 (102.8)	31
32					32
33	(C) BALOCHISTAN				33
34	TOTAL INDUSTRIAL	(1,227.181)	603.800	1,830.981 (149.2)	34
35	POWER - WAPDA	-	0.000	0.000 100.0	35
36	HABIBULLAH COASTAL POWER	(946.451)	465.615	1,412.065 (149.2)	36
37	CNG STATIONS	(213.655)	102.796	316.451 (148.1)	37
38	CAPTIVE POWER	(1.881)	1.075	2.957 (157.2)	38
39	GENERAL INDUSTRIES	(65.194)	34.315	99.509 (152.6)	39
40					40
41	COMMERCIAL	(201.074)	91.745	292.819 (145.6)	41
42	DOMESTIC	(2,979.320)	(1,224.623)	1,754.697 (58.9)	42
43	SUB TOTAL 'C'	(4,407.575)	(529.078)	3,878.497 (88.0)	43
44	(D) Decrease in Sales Value and GDS due to Customers in Litigation		(450.124)	(450.124) 100.0	44
45	TOTAL SALES (A+B+C+D)	(56,985.914)	4,891.600	61,877.515 (108.6)	45

Table # B-4.1

SUI SOUTHERN GAS COMPANY LIMITED
UN-ACCOUNTED FOR GAS - FOR TARIFF WORKING

MMCF

S.No.	Description	Determination ERR FY 2019-20 dt:-17-05-2019	Review Petition ERR FY 2019-20	Review Petition 2019-20 With Volume Handled	S.No.
1	Gross Purchases	414,904	408,332	408,332	1
2	RLNG held stock to SSGCL / Purchases		28,586	28,586	2
3	Gas handled on behalf of SNGPL / LNG Allocation as per GOP directives			288,736	3
4	Gross Purchases	414,904	436,919	725,654	4
5	Gas Consumed Internally - metered	709	2,969	2,969	5
6	Available for Sale	414,195	433,950	722,685	6
7					7
8	Gas Sales	349,064	355,363	355,363	8
9	RLNG held stock to SSGCL / Sales		24,463	24,463	9
10	Additional Gas Delivered to SNGPL under SWAP arrangement to meet RLNG energy requirement			288,736	10
11	Add: Gas Shrinkage at + Condensate (LHF)	23	23	23	11
12		349,087	379,849	668,585	12
13					13
14	Gas Unaccounted For	65,108	54,100	54,100	14
15	Gas Unaccounted For (%)	15.69%	12.38%	7.46%	15
16					16
17	Disallowed volumes - MMCF	38,969	26,575	8,384	17
18	Allowable Gas Unaccounted For	26,139	27,526	45,716	18
19	Effective UFG Benchmark (i)	6.30%	6.30%	6.30%	19
20	WACOG - Rs per MCF	494.70	531.33	531.33	20
21	Disallowed value over & above UFG targets - Rs Million	19,278	14,120	4,455	21
22	UFG adjustments on RLNG volume handled basis			9,665	22
				(iii) 750	

Note:-

- (i) Adjusted on the basis of UFG study while claiming benchmark at 6.30%.
(ii) Restricted at Rs 750 million as per rule 20(1) of Natural Gas Tariff Rule 2002.

SUI SOUTHERN GAS COMPANY LIMITED
TRANSMISSION AND DISTRIBUTION COST

Rupees Million

S.No.	DESCRIPTION	Determination ERR FY 2019-20 dt:-17-05-2019	Review Petition ERR FY 2019-20	Variance Inc./ (Dec.) Over DERR		S.No.
					%	
1	Salaries, wages, and benefits at benchmark	14,156.000	15,520.000	1,364.000	9.6	1
2	Gas consumed internally	405.478	817.209	411.731	101.5	2
3	Other T&D Cost					3
4	Stores, spares and supplies consumed	798.000	1,252.000	454.000	56.9	4
5	Material used on consumers installations	39.000	39.000	-	-	5
6	Electricity	230.000	230.000	-	-	6
7	Rent, rate & taxes	311.000	312.000	1.000	0.3	7
8	Traveling	131.000	131.000	-	-	8
9	Insurance	134.000	134.000	-	-	9
10	Postage & bill delivery through contractor	103.000	115.000	12.000	11.7	10
11	Repairs & maintenance	1,633.000	3,542.098	1,909.098	116.9	11
12	Legal charges	100.000	199.000	99.000	67.8	12
13	Professional charges	46.000	46.000			13
14	License Fee to OGRA	130.107	130.107	-	-	14
15	Meter reading by contractors	90.000	90.000	-	-	15
16	Collecting agent commission	3.000	3.000	-	-	16
17	Security expenses	722.000	943.000	221.000	30.6	17
18	Gas bills collection charges	197.000	197.000	-	-	18
19	Gas bills stubs processing charges	36.000	36.000	-	-	19
20	Advertisement	112.000	112.000	-	-	20
21	Others	148.500	151.500	3.000	2.0	21
23	Sub-total other T&D cost	4,963.607	7,662.705	2,699.098	54.4	23
24	GROSS T&D COST	19,525.085	23,999.914	4,474.829	22.9	24
25	Less: Recoveries / Allocations	2,028.216	2,028.216	-	-	25
26	Net Transmission & Distribution Cost	17,496.870	21,971.699	4,474.829	25.6	26
27	<u>POLICY CHANGE PURSUANT TO APPLICATION OF IFRIC4</u>					27
28	Less:					28
29	# Recovery of service cost (gas transportation)	190.784	190.784	-	-	29
30	Total	17,306.085	21,780.914	4,474.829	25.9	30

Note:- # Treatment pursuant to IFRIC-4.

Table # B-6

SUI SOUTHERN GAS COMPANY LIMITED
SCHEDULE OF DEPRECIATION

Rupees Million

S.No.	DESCRIPTION	Determination ★ ERR FY 2019-20 dt:-17-05-2019	Review Petition ERR FY 2019-20	Variance Inc./ (Dec.) Over DERR FY 2018-19	S.No.
				%	
1	Building		105.167		1
2	Roads, pavements and related infrastructures		61.803		2
3	Gas transmission pipelines		523.555		3
4	Compressors		36.986		4
5	Plant and Machinery		156.116		5
6	Gas distribution systems		4,527.999		6
7	Office Furniture, equipment & computer		238.080		7
8	Computer Software (Intangible)		64.230		8
9	LPG Air Mix Projects		310.656		9
10	Telecommunication system		64.609		10
11	Appliances, loose tools and equipments		139.185		11
12	Vehicles		293.845		12
13	Construction equipment		30.232		13
14	SCADA		64.683		14
15		6,385.890	6,617.146	231.256 3.3	15
16	Less: Meter Manufacturing Plant		28.261		16
17	LPG Air Mix Projects		310.656		17
18	Depreciation charge to capital projects		391.717		18
19			730.634		19
20			5,886.512		20
21	<u>POLICY CHANGE PURSUANT TO APPLICATION OF IFRIC4</u>				21
22	Less: # Recovery of service cost (gas transportation)		60.929		22
23	Total	5,505.723	5,825.583	319.860 5.3	23

Note:- #; Treatment pursuant to IFRIC-4.

★ Breakup not provided in Determination.

Table # B-9.5

SUI SOUTHERN GAS COMPANY LIMITED
METER MANUFACTURING PROFIT

S.No.	DESCRIPTION	Determination ERR FY 2019-20 dt:-17-05-2019	Review Petition ERR FY 2019-20	Variance Inc./ (Dec.) Over Determination FY 2019-20		S.No.
1	<u>BOTH METERS</u>				%	1
2	NO.OF METERS PRODUCED	920,000	920,000	-	-	2
3						3
4	SNGPL	250,000	250,000	-	-	4
5	OTHERS	13,700	13,700	-	-	5
6	TOTAL OUTSIDE SALE	263,700	263,700	-	-	6
7	COMPANY'S CONSUMPTION	656,300	656,300	-	-	7
8	TOTAL SALE (NOS.)	920,000	920,000	-	-	8
9						9
10	RUPEES MILLION					10
11	COMPANY'S CONSUMPTION	2,277.917	2,277.917	-	-	11
12	OUTSIDE SALE	933.744	933.744	-	-	12
13	NET SALES	3,211.661	3,211.661	-	-	13
14	MATERIAL CONSUMED	2,419.360	2,419.360	-	-	14
15	LABOUR & OVERHEADS	741.345	749.345	8.000	1.1	15
16	DEPRECIATION	28.261	28.261	-	-	16
17	AVAILABLE FOR SALE	3,188.966	3,196.966	8.000	0.3	17
18	COST OF SALES	3,188.966	3,196.966	8.000	0.3	18
19	OPERATING PROFIT	22.695	14.695	(8.000)	(35.3)	19
20		-		-	-	20
21	TOTAL PROFIT	22.695	14.695	(8.000)	(35.3)	21

Table # B-12.1

SUI SOUTHERN GAS COMPANY LIMITED
ADDITION TO FIXED AND INTANGIBLE ASSETS

Rupees Million

S.No.	DESCRIPTION	Determination ERR FY 2019-20 dt:-17-05-2019	Review Petition ERR FY 2019-20	Variance Inc./ (Dec.) Petition Over Determination		S.No.
					%	
1	Land	0.900	0.900	-	-	1
2	Buildings	140.000	168.000	28.000	20.0	2
3	Gas Transmission Pipeline	1,345.000	1,345.000	-	-	3
4	Compressors	777.000	777.000	-	-	4
5	Plant and machinery	336.000	523.000	187.000	55.7	5
6	Gas distribution system and related facilities & equipments	5,994.000	11,047.000	5,053.000	84.3	6
7	Furniture, equipment including computers & allied equipments	237.000	281.000	44.000	18.6	7
8	Computer Software (Intangible)	9.000	89.000	80.000	888.9	8
9	LPG Air Mix Projects	1,893.000	1,893.000	-	-	9
10	Telecommunication system	100.000	100.000	-	-	10
11	Appls., loose tools & equipt.	306.000	459.000	153.000	50.0	11
12	Vehicles	177.000	753.000	576.000	325.4	12
13	Construction equipment & vehicles	27.000	83.000	56.000	207.4	13
14	TOTAL	11,341.900	17,518.900	6,177.000	54.5	14

Sui Southern Gas Company Limited

Schedule of Fixed and Intangible Assets at Cost / WDV - For ROA

Rs Million

S.No.	DESCRIPTION	DERR 2019-20 Related to Natural Gas Customers			Review on DERR 2019-20 Related to Natural Gas Customers			S.No.
		Opening Balances	Addition	Closing Balances	Addition	Closing Balances	Opening Balances	
1	OVERALL							1
2	COST	122,798.809	11,341.900	134,140.709	122,798.809	17,518.900	140,317.709	2
3	DEP	79,555.786	7,969.890	87,525.676	79,555.786	6,617.146	86,172.932	3
4	WDV	43,243.023		46,615.033	43,243.023		54,144.777	4
5								5
6	LPG Air Mix Assets							6
7	COST	1,004.795	2,294.000	3,298.795	1,004.795	2,294.000	3,298.795	7
8	DEP	490.148	181.302	671.450	490.148	181.302	671.450	8
9	WDV	514.647		2,627.345	514.647		2,627.345	9
10								10
11	Meter Manufacturing Plant							11
12	COST	702.939	8.870	711.809	702.939	8.870	711.809	12
13	DEP	432.776	28.261	461.037	432.776	28.261	461.037	13
14	WDV	270.163		250.772	270.163		250.772	14
15	Assets related to LHF (Condensate)							15
16	COST	57.799	-	57.799	57.799	-	57.799	16
17	DEP	47.281	3.104	50.385	47.281	3.104	50.385	17
18	WDV	10.518		7.414	10.518		7.414	18
19								19
20	Assets related to LPG Air Mix and Meter Manufacturing Plant							20
21	COST	1,765.533		4,068.403	1,765.533		4,068.403	21
22	DEP	970.206		1,182.873	970.206		1,182.873	22
23	WDV	795.328		2,885.531	795.328		2,885.531	23
24								24
25	Fixed assets related to gas activity							25
26	COST	121,033.275		130,072.305	121,033.275		136,249.305	26
27	DEP	78,585.580		86,342.803	78,585.580		84,990.060	27
28	WDV	42,447.695		43,729.502	42,447.695		51,259.246	28
29	OVERALL							29
30	Net assets at beginning			43,243.023			43,243.023	30
31	Net assets at ending			46,615.033			54,144.777	31
32				89,858.055			97,387.799	32
33	Average net fixed assets			44,929.028			48,693.900	33
34								34
35	Manufacturing Plant							35
36	Net assets at beginning			514.647			654.987	36
37	Net assets at ending			2,627.345			2,756.438	37
38				3,141.992			3,411.425	38
39	Average net fixed assets			1,570.996			1,705.712	39
40								40
41	Net assets at beginning			42,728.376			42,588.035	41
42	Net assets at ending			43,987.688			51,388.339	42
43				86,716.064			93,976.374	43
44	Average net fixed assets related to gas activity			43,358.032			46,988.187	44
45								45

C

SUI SOUTHERN GAS COMPANY LIMITED

REVIEW PETITION

FOR ESTIMATED REVENUE REQUIREMENT

FY 2019-20

SECTION - C

Tariff Working, Financial Statements & Other Schedules
(As per OGRA Prescribed Formats)

DESCRIPTION	Table #
Tariff calculation sheet	C-1
Late Payment Surcharge	* C-4
Category-wise sales, prescribed price and GDS - existing	C-5
Statement of gas sales category-wise monthly and biannually	C-6
Basis and Assumption for weighted average cost of gas	C-7
Weighted average cost of gas of both companies	C-8
Statement of gas purchases field-wise monthly and biannually - SSGCL	C-8.1

Note: * Not being forwarded as unchanged.

Table # C-1

SUI SOUTHERN GAS COMPANY LIMITED
TARIFF CALCULATION SHEET
FOR THE FINANCIAL YEAR 2019-20

Particulars		Review Petition ERR FY 2019-20
1	Gas Sales	
1A	MMCF	355,363
1B	BBTU	362,668
1C	Average Calorific Value per MMCF	1,021
	Rs Million	
2	Net Operating Revenues	
	Sales at current Prescribed Price	267,097.914
	Income from Sale of LPG	1,066.353
	Meter rentals	820.130
	Amortization of deferred credit	473.216
	Sale of Gas Condensate (NGL)	197.713
	Late payment Surcharge	3,292.345
	Meter manufacturing plant profit/ (loss)	7.348
	Notional interest income on IAS 19 provision	645.281
	Other income	1,022.370
2A	Total Income	274,622.670
	Less: Operating Expenses	
	Cost of gas	248,782.044
	Adjustment in cost of gas for UFG above allowable limit	(750.000)
	UFG adjustments on RLNG volume handled basis (ring fee)	(9,665.131)
	Staggering of Financial Impact on account of SHC Order	(3,671.767)
	Transmission and distribution cost	20,963.705
	Gas Internally Consumed	817.209
	Depreciation	5,825.583
	Other charges excluding WPPF	1,545.939
2B	Total Expenses	263,847.582
2C	Return available (2A - 2B)	10,775.088
3	Required Return on Net Fixed Assets	
	Net Operating Fixed Assets at Beginning	37,788.655
	Net Operating Fixed Assets at End	46,270.633
3A		84,059.288
3B	Average Net Operating Fixed Assets (3A / 2)	42,029.644
3C	Required Return on Net Assets - In Percentage	17.43%
3D	Required Return (3B x 3C)	7,325.767
4	Shortfall / (Surplus) in Gas Operation [3D-2C]	(3,449.321)
6	Subsidy for LPG Air Mix Projects over & above Gas Operation	1,190.657
7	Shortfall in Revenue Requirement	(2,258.664)
8	Shortfall related to prior years	24,933.00
9	Total Shortfall in Revenue Requirement	22,674.336
	Rupees per MMBTU (w.e.f. 1 July 2019)	62.52

SUI SOUTHERN GAS COMPANY LIMITED

Category-wise Sales, Prescribed value and GDS

FOR THE FINANCIAL YEAR 2019-20

CATEGORY	Estimated	At Existing Selling Price Notification		At Prescribed Price Notification		Gas Development Surcharge
	ENERGY BBTU	Average Rate Rs per MMBTU	Commodity / Fixed Charge Rs in Million	Average Rate Rs per MMBTU	Commodity / Fixed Charge Rs in Million	
DOMESTIC		notification dt-29-06-2019		determination dt-17-05-2019		
Nil / Min. Charges	7,208	172.58	2,352	172.58	2,352	-
Bulk Consumption	2,883	780.00	2,249	1,106.48	3,190	(941)
<u>Standalone Consumption</u>						
Upto 50 m3	5,981	121.00	724	368.83	2,206	(1,482)
Upto 100 m3	33,893	194.89	6,605	368.83	12,501	(5,895)
Upto 200 m3	37,701	379.86	14,321	553.24	20,858	(6,537)
Upto 300 m3	7,181	583.31	4,189	737.65	5,297	(1,108)
Upto 400 m3	2,331	780.30	1,819	1,106.48	2,579	(760)
Above 400 m3	9,324	1,371.79	12,791	1,106.48	10,317	2,474
Total Domestic	106,503	422.99	45,050	556.79	59,300	(14,250)
COMMERCIAL						
<u>Special Commercial (Roti Tandoor)</u>						
Nil / Min. Charges	0	148.50	0	148.50	0	-
Upto 50 m3	0	110.00	0	368.83	0	(0)
Upto 100 m3	0	110.00	0	368.83	0	(0)
Upto 200 m3	2	220.00	0	737.65	1	(1)
Upto 300 m3	4	220.00	1	737.65	3	(2)
Upto 400 m3	10	700.00	7	841.41	8	(1)
Above 400 m3	610	700.00	427	841.41	513	(86)
Special Commercial (Roti Tandoor)	626	695.00	435	840.22	526	(91)
Other Commercial	10,095	1,283.00	12,952	1,177.97	11,891	1,060
Total Commercial	10,721	1,248.65	13,387	1,158.24	12,418	969
Fertilizer - Feed	19,822	300.00	5,947	222.37	4,408	1,539
Fertilizer - Fuel	818	1,021.00	836	937.57	767	68
Power	58,178	824.00	47,938	756.07	43,986	3,952
Habibullah Coastal Power (Pvt.) Ltd.	6,854	824.00	5,648	756.07	5,182	466
Cement	390	1,277.00	499	1,171.96	458	41
Gen. Industry	35,215	1,021.00	35,955	937.57	33,017	2,938
TEXTILE PROCESS (Zero Rated)	27,087	786.00	21,290	721.21	19,535	1,755
CAPTIVE POWER - TEXTILE (Z)	42,187	786.00	33,159	721.21	30,426	2,733
Captive	29,368	1,021.00	29,984	937.57	27,534	2,450
CNG	25,524	1,283.00	32,747	1,177.97	30,066	2,681
Total Industrial	245,444	871.90	214,003	796.03	195,380	18,623
Total	362,668	751.21	272,440	736.48	267,098	5,342
Decrease in Sales Value and GDS due to Customers in Litigation			(450)			(450)
TOTAL	362,668		271,990		267,098	4,892

Note:-

- ★ Consumers' prices have been taken as per notifications dated 29 June 2019, 9 August 2019 and 13 September 2019.
- ◆ Prescribed prices have been taken as per OGRA determination for FY 2019-20 dated 17 May 2019.
- Net gas sales revenue (prescribed value) may change after the issuance of prescribed price notification by the Authority.

SUI SOUTHERN GAS COMPANY LIM
STATEMENT OF GAS SALES
ERR Petition For FY 2019-20

Table # C-6

	July/19					August/19					September/19				
	MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million	MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million	MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million
KARACHI (UNIT - A)															
POWER - KESC	56.9	1,349	1,384	1,140.348	94.009	45.7	1,161	1,190	980.843	80.860	50.0	1,501	1,560	1,283.176	105.949
POWER - BINQASIM	79.5	2,678	2,793	2,301.322	189.719	78.2	2,671	2,776	2,287.377	188.570	78.4	2,352	2,491	2,032.384	169.197
CEMENT	0.9	13	13	16.172	1.330	1.0	21	21	26.783	2.203	1.7	50	51	64.658	5.318
FERTILIZER - Feedstock	58.4	1,777	1,863	558.865	144.616	55.3	1,709	1,791	537.203	139.010	56.0	1,580	1,775	532.477	137.787
FERTILIZER - Power	5.5	34	35	36.110	2.951	7.2	53	55	56.201	4.592	7.0	210	222	226.234	18.486
PAK STEEL	2.0	64	64	65.136	5.323	2.0	65	65	65.855	5.381	2.0	60	61	62.427	5.101
CNG STATIONS	41.1	994	1,004	1,288.671	105.494	43.7	973	976	1,252.762	102.555	35.8	1,074	1,101	1,412.306	115.615
CAPTIVE POWER	51.4	1,509	1,545	1,577.952	128.941	54.7	1,395	1,423	1,453.202	118.747	48.7	1,460	1,508	1,539.423	125.792
CAPTIVE POWER (TEXTILE)	70.6	2,942	3,000	2,357.905	194.362	73.1	2,728	2,766	2,174.165	179.216	73.6	2,208	2,280	1,792.461	147.753
ZERO-RATED INDUSTRIES	63.0	2,487	2,539	1,995.552	164.493	66.9	2,327	2,362	1,856.380	153.021	62.4	1,871	1,923	1,511.758	124.614
GENERAL INDUSTRIES	82.0	2,073	2,101	2,145.424	175.311	88.5	1,825	1,844	1,882.891	153.859	77.2	2,315	2,380	2,439.647	198.536
COMMERCIAL	21.1	613	619	773.246	55.989	23.4	580	582	725.585	52.611	20.0	601	615	768.125	55.618
DOMESTIC	162.8	4,197	4,259	1,780.216	(588.213)	183.5	4,541	4,586	1,915.894	(633.744)	172.3	5,168	5,305	2,217.343	(732.647)
SUB TOTAL 'A'	695.1	20,728	21,220	16,036.921	674.326	723.3	20,050	20,438	15,217.141	547.252	685.0	20,551	21,271	15,894.419	477.122
SINDH (UNIT - B)															
POWER - WAPDA	33.8	490	487	401.182	33.073	17.7	431	422	347.598	28.656	15.7	472	486	400.848	33.046
NOORABAD POWER PLANT	16.8	521	530	436.600	35.993	16.8	522	530	436.781	36.008	20.0	600	611	503.804	41.533
CEMENT	0.0	1	2	1.945	0.160	-	2	2	1.967	0.162	-	-	-	-	-
CNG STATIONS	28.4	624	627	803.927	65.812	27.4	678	678	869.533	71.184	28.1	844	852	1,093.118	89.486
CAPTIVE POWER	19.8	613	618	630.639	51.532	22.7	521	518	522.521	43.188	26.9	807	803	820.057	67.010
CAPTIVE POWER (TEXTILE)	29.9	1,187	1,147	901.528	74.313	30.6	1,118	1,082	850.438	70.102	29.6	888	884	694.792	57.272
ZERO-RATED INDUSTRIES	0.6	53	50	39.562	3.261	1.0	48	46	36.304	2.992	0.8	24	24	18.559	1.530
GENERAL INDUSTRIES	10.6	260	256	261.768	21.390	11.0	207	204	208.574	17.043	8.5	254	253	258.400	21.115
COMMERCIAL	4.3	123	122	152.507	11.043	4.7	119	116	145.315	10.522	4.4	132	132	164.821	11.934
DOMESTIC	73.0	1,670	1,664	684.472	(249.271)	75.5	1,799	1,793	737.521	(268.590)	70.5	2,116	2,117	870.721	(317.099)
SUB TOTAL 'B'	217.2	5,546	5,503	4,314.130	47.306	207.5	5,446	5,391	4,182.570	11.266	204.5	6,136	6,163	4,825.119	5.827
QUETTA (ONGDP)															
POWER - WAPDA	(0)	0	0	0.000	0.000	-	-	-	-	-	-	-	-	-	-
HABIBULLAH COASTAL POWER	21.8	389	377	310.789	25.621	22.2	356	341	281.264	23.187	22.2	667	642	529.222	43.629
CNG STATIONS	3.2	45	44	56.111	4.593	3.2	48	46	58.603	4.797	3.0	89	86	110.129	9.015
CAPTIVE POWER	-	0	0	0.453	0.037	-	1	1	0.515	0.042	-	-	-	-	-
GENERAL INDUSTRIES	1.0	42	41	41.461	3.388	1.2	25	24	24.539	2.007	0.8	24	23	23.587	1.927
COMMERCIAL	2.6	82	80	99.495	7.204	3.0	73	71	88.054	6.376	2.5	75	72	89.947	6.513
DOMESTIC	20.9	753	730	341.315	(62.040)	23.5	817	787	367.617	(66.821)	21.7	651	627	292.881	(53.236)
SUB TOTAL 'C'	49.6	1,311	1,272	849.624	(21.196)	53.0	1,319	1,269	820.612	(30.411)	50.2	1,506	1,450	1,045.765	7.848
TOTAL	961.9	27,585	27,995	21,200.675	700.436	983.9	26,815	27,097	20,200.323	528.106	939.8	28,194	28,884	21,765.303	490.796

SUI SOUTHERN GAS COMPANY LIM.
STATEMENT OF GAS SALES
ERR Petition For FY 2019-20

Table # C-6

	October/19					November/19					December/19				
	MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million	MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million	MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million
KARACHI (UNIT - A)															
POWER - KESC	47.1	1,460	1,517	1,250,072	103,058	28.3	349	882	726,925	59,927	15.6	484	503	414,407	34,163
POWER - BINQASIM	76.6	2,374	2,514	2,071,587	170,780	72.4	2,172	2,300	1,895,154	156,235	59.0	1,828	1,937	1,595,698	131,548
CEMENT	0.6	20	20	25,863	2,127	0.6	17	17	21,984	1,808	1.9	60	61	77,589	6,382
FERTILIZER - Feedstock	57.8	1,791	1,892	567,658	146,891	58.5	1,756	1,855	556,565	144,020	58.5	1,814	1,916	574,948	148,777
FERTILIZER - Power	3.5	108	114	116,349	9,507	14.6	438	462	471,859	38,558	(12.0)	(373)	(394)	(401,834)	(32,836)
PAK STEEL	2.0	63	64	65,548	5,356	2.0	61	62	63,467	5,186	2.0	63	64	65,548	5,356
CNG STATIONS	39.1	1,211	1,241	1,591,618	130,294	40.1	1,204	1,234	1,582,654	129,561	39.8	1,235	1,266	1,623,916	132,938
CAPTIVE POWER	51.9	1,609	1,662	1,696,580	138,634	52.6	1,578	1,629	1,663,516	135,933	48.2	1,493	1,542	1,574,156	128,631
ZERO-RATED INDUSTRIES	81.7	2,534	2,617	2,056,968	169,556	78.2	2,347	2,424	1,904,940	157,024	72.3	2,241	2,315	1,819,325	149,967
GENERAL INDUSTRIES	73.6	2,280	2,343	1,841,959	151,833	73.9	2,218	2,279	1,791,564	147,679	68.8	2,133	2,192	1,723,109	142,036
COMMERCIAL	86.9	2,692	2,767	2,825,281	230,865	89.5	2,685	2,759	2,817,198	230,205	83.6	2,591	2,663	2,719,193	222,196
DOMESTIC	22.5	696	713	890,361	64,469	23.0	690	707	882,823	63,923	22.8	707	724	903,639	55,431
SUB TOTAL 'A'	169.5	5,254	5,393	2,254,135	(744,804)	180.9	5,426	5,570	2,327,873	(765,168)	197.7	6,130	6,292	2,629,853	(868,948)
	712.7	22,093	22,858	17,253,979	578,565	714.7	21,440	22,181	16,706,523	500,891	658.3	20,407	21,081	15,319,547	265,643
SINDH (UNIT - B)															
POWER - WAPDA	22.8	708	730	601,272	49,568	23.2	696	717	591,081	48,728	-	-	-	-	-
NOORABAD POWER PLANT	20.0	620	632	520,597	42,918	20.0	600	611	503,804	41,533	-	-	-	-	-
CEMENT	0.0	1	1	1,299	0,107	-	-	-	-	-	20.0	620	632	520,597	42,918
CNG STATIONS	26.8	832	840	1,077,544	88,211	28.0	841	849	1,089,387	89,180	0.0	1	1	1,299	0,107
CAPTIVE POWER	30.2	936	932	951,513	77,752	28.5	856	852	870,238	71,111	27.8	861	869	1,115,103	91,285
CAPTIVE POWER (TEXTILE)	32.8	1,018	1,013	796,040	65,618	32.1	962	958	752,891	62,061	28.1	872	868	885,860	72,387
ZERO-RATED INDUSTRIES	0.8	25	25	19,955	1,645	6.8	24	24	18,687	1,540	32.0	993	989	777,023	64,050
GENERAL INDUSTRIES	11.8	364	363	370,799	30,299	12.6	377	375	383,281	31,319	0.7	21	21	16,735	1,379
COMMERCIAL	4.4	137	137	171,545	12,421	4.6	137	137	170,622	12,354	11.8	366	365	372,929	30,473
DOMESTIC	63.4	1,964	1,965	808,304	(294,368)	72.9	2,186	2,188	899,909	(327,729)	4.8	149	149	186,131	13,477
SUB TOTAL 'B'	213.1	6,606	6,638	5,318,868	74,171	222.7	6,680	6,712	5,279,900	30,099	85.3	2,643	2,645	1,088,009	(396,231)
QUETTA (ONGDP)															
POWER - WAPDA	24.1	747	719	592,697	48,862	21.3	639	615	507,006	41,797	-	-	-	-	-
HABIBULLAH COASTAL POWER	3.0	94	90	115,636	9,466	2.9	87	84	107,376	8,790	20.0	619	596	491,137	40,489
CNG STATIONS	1.2	38	36	37,065	3,029	-	-	-	-	-	2.7	83	79	101,870	8,339
CAPTIVE POWER	2.8	88	85	105,612	7,647	1.3	38	36	37,065	3,029	0.1	2	2	1,685	0,138
GENERAL INDUSTRIES	23.0	713	686	320,450	(58,247)	3.2	96	93	115,646	8,374	1.3	39	37	38,188	3,120
COMMERCIAL	54.2	1,679	1,616	1,171,459	10,756	53.2	1,596	1,536	717,848	(130,481)	3.4	105	101	125,640	9,097
DOMESTIC	979.9	30,378	31,112	23,744,306	663,492	81.9	2,456	2,364	1,484,940	(68,491)	50.4	1,562	1,503	702,594	(127,708)
SUB TOTAL 'C'						1,019.2	30,576	31,256	23,471,363	462,498	77.7	2,409	2,318	1,461,113	(66,525)
TOTAL											946.6	29,343	29,938	21,744,346	118,965

SUI SOUTHERN GAS COMPANY LIM
STATEMENT OF GAS SALES
ERR Petition For FY 2019-20

Table # C-6

	January/20					February/20					March/20				
	MMCFD	MMCF	MMABTU	Sales Rs Million	GDS Rs Million	MMCFD	MMCF	MMABTU	Sales Rs Million	GDS Rs Million	MMCFD	MMCF	MMABTU	Sales Rs Million	GDS Rs Million
KARACHI (UNIT - A)															
POWER - KESC	30.5	945	982	809,122	66,703	15.9	462	480	395,509	32,606	21.1	653	679	559,107	46,092
POWER - BINOASIM	40.6	1,258	1,333	1,098,205	90,535	50.0	1,449	1,535	1,264,844	104,273	49.2	1,527	1,617	1,332,249	109,830
CEMENT	1.0	31	31	40,088	3,297	1.4	39	40	50,895	4,186	1.1	34	34	43,967	3,617
FERTILIZER - Feedstock	14.5	450	475	142,628	36,907	44.6	1,253	1,366	409,681	106,012	55.6	1,724	1,821	546,482	141,396
FERTILIZER - Power	3.6	112	118	120,658	9,859	2.9	85	90	91,494	7,476	0.8	24	25	25,855	2,113
PAK STEEL	2.0	63	64	65,548	5,356	2.0	59	60	61,424	5,019	2.0	62	63	64,508	5,271
CNG STATIONS	44.7	1,385	1,420	1,821,427	149,107	40.3	1,169	1,198	1,536,965	125,820	42.2	1,309	1,342	1,721,371	140,916
CAPTIVE POWER	50.8	1,576	1,627	1,661,648	135,780	52.4	1,520	1,570	1,602,631	130,957	54.2	1,680	1,735	1,770,952	144,712
CAPTIVE POWER (TEXTILE)	75.8	2,349	2,426	1,906,742	157,173	75.4	2,188	2,260	1,776,005	146,396	77.7	2,410	2,489	1,956,057	161,238
ZERO-RATED INDUSTRIES	72.3	2,242	2,304	1,811,266	149,303	69.9	2,028	2,084	1,638,405	135,054	71.8	2,225	2,287	1,797,439	148,163
GENERAL INDUSTRIES	88.2	2,733	2,809	2,868,310	234,381	83.8	2,488	2,557	2,610,936	213,350	85.6	2,655	2,728	2,785,531	227,617
COMMERCIAL	24.0	743	761	950,152	68,799	22.8	661	677	844,845	61,173	22.2	688	705	879,700	63,697
DOMESTIC	210.4	6,521	6,694	2,797,716	(924,412)	212.6	6,166	6,329	2,645,325	(874,060)	186.6	5,786	5,939	2,482,127	(820,136)
SUB TOTAL 'A'	658.4	20,410	21,045	16,093,509	182,789	676.1	19,607	20,245	14,928,957	198,263	670.2	20,775	21,463	15,965,285	374,525
SINDH (UNIT - B)															
POWER - WAPDA	6.5	203	209	172,399	14,212	7.3	211	218	179,435	14,793	36.9	1,145	1,180	972,396	80,164
NOORABAD POWER PLANT	20.0	620	632	520,597	42,918	20.0	580	591	487,010	40,149	20.0	620	632	520,597	42,918
CEMENT	0.0	1	1	1,299	0,107	-	-	-	-	-	-	-	-	-	-
CNG STATIONS	30.9	957	966	1,239,396	101,460	28.3	821	829	1,063,151	87,033	29.9	928	936	1,201,499	98,358
CAPTIVE POWER	29.2	905	901	919,706	75,153	29.1	842	838	856,107	69,956	30.7	953	948	968,184	79,114
CAPTIVE POWER (TEXTILE)	34.1	1,058	1,053	827,355	68,199	31.7	919	915	719,263	59,289	34.1	1,058	1,053	827,718	68,229
ZERO-RATED INDUSTRIES	1.0	31	31	24,322	2,005	1.0	30	30	23,463	1,934	0.8	25	25	19,779	1,630
GENERAL INDUSTRIES	12.3	380	379	386,727	31,601	11.7	340	339	346,309	28,298	12.0	373	372	379,669	31,024
COMMERCIAL	4.9	152	152	189,825	13,745	4.8	139	139	173,193	12,541	4.6	144	144	179,361	12,987
DOMESTIC	96.6	2,995	2,997	1,232,688	(448,920)	103.7	3,007	3,009	1,237,471	(450,662)	71.4	2,214	2,216	911,247	(331,858)
SUB TOTAL 'B'	235.5	7,302	7,320	5,514,315	(99,520)	237.6	6,890	6,908	5,085,403	(136,670)	240.6	7,460	7,506	5,980,451	82,567
QUETTA (ONGDP)															
POWER - WAPDA	24.3	754	726	598,251	49,319	22.2	645	619	510,321	42,071	21.0	650	626	515,733	42,517
HABIBULLAH COASTAL POWER	3.0	93	89	114,259	9,354	2.9	85	81	104,346	8,542	3.5	108	104	133,532	10,931
CNG STATIONS	0.1	2	2	1,685	0,138	0.1	2	2	1,745	0,143	0.1	2	2	1,685	0,138
CAPTIVE POWER	1.4	42	41	41,557	3,396	1.3	37	35	36,062	2,947	1.4	43	42	42,681	3,488
GENERAL INDUSTRIES	3.5	109	105	131,301	9,507	2.9	85	81	101,628	7,359	3.3	102	98	122,454	8,867
COMMERCIAL	53.2	1,649	1,587	741,611	(134,801)	53.9	1,852	1,782	833,087	(151,428)	45.8	1,421	1,367	638,872	(116,126)
DOMESTIC	85.4	2,649	2,549	1,628,665	(63,087)	93.2	2,703	2,601	1,587,189	(90,367)	75.0	2,326	2,238	1,454,956	(50,186)
SUB TOTAL 'C'	979.4	30,360	30,915	23,236,489	20,182	1,006.9	29,200	29,754	21,601,550	(28,774)	985.8	30,561	31,207	23,400,692	406,905
TOTAL															

SUI SOUTHERN GAS COMPANY LIM
STATEMENT OF GAS SALES
ERR Petition For FY 2019-20

Table # C-6

	April/20					May/20					June/20				
	MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million	MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million	MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million
KARACHI (UNIT - A)															
POWER - KESC	28.5	856	889	732.919	60.421	69.3	2,149	2,233	1,840.003	151.689	71.0	2,129	2,212	1,822.879	150.277
POWER - BINQASIM	58.0	1,741	1,844	1,519.484	125.265	76.0	2,357	2,496	2,056.584	169.543	99.4	2,981	3,157	2,601.486	214.465
CEMENT	1.4	42	43	54.313	4.467	0.6	19	19	24.570	2.021	1.1	34	34	43.967	3.617
FERTILIZER - Feedstock	49.5	1,484	1,568	470.354	121.712	50.9	1,579	1,668	500.465	129.504	57.8	1,733	1,831	549.275	142.134
FERTILIZER - Power	0.8	24	25	25.855	2.113	1.3	40	42	43.092	3.521	0.7	22	23	23.701	1.937
PAK STEEL	2.0	60	61	62.427	5.101	2.0	62	63	64.508	5.271	2.0	60	61	62.427	5.101
CNG STATIONS	42.6	1,277	1,309	1,678.840	137.435	36.5	1,131	1,159	1,486.614	121.698	39.5	1,185	1,215	1,558.308	127.568
CAPTIVE POWER	54.9	1,646	1,700	1,735.876	141.845	51.6	1,598	1,651	1,685.344	137.716	54.2	1,625	1,679	1,713.794	140.041
CAPTIVE POWER (TEXTILE)	81.8	2,455	2,535	1,992.566	164.247	79.7	2,470	2,551	2,004.904	165.264	78.9	2,366	2,444	1,920.716	158.325
ZERO-RATED INDUSTRIES	70.8	2,123	2,182	1,714.685	141.342	69.1	2,142	2,201	1,770.320	142.630	66.4	1,991	2,046	1,608.026	132.550
GENERAL INDUSTRIES	86.5	2,596	2,668	2,724.323	222.615	80.8	2,504	2,574	2,628.071	214.750	75.5	2,264	2,327	2,375.543	194.115
COMMERCIAL	22.8	683	700	873.902	63.277	20.2	626	641	800.510	57.963	20.2	606	620	774.379	56.071
DOMESTIC	174.6	5,237	5,375	2,246.587	(742.310)	163.0	5,054	5,188	2,168.426	(716.484)	154.1	4,622	4,744	1,982.903	(655.184)
SUB TOTAL 'A'	674.1	20,224	20,899	15,832.132	447.531	701.0	21,732	22,487	17,033.412	585.088	720.6	21,618	22,393	17,037.405	671.015
SINDH (UNIT - B)															
POWER - WAPDA	45.8	1,373	1,415	1,166.026	96.126	52.7	1,633	1,683	1,386.833	114.330	67.0	2,010	2,072	1,707.001	140.724
NOORABAD POWER PLANT	20.0	600	611	503.804	41.533	20.0	620	632	520.597	42.918	20.0	600	611	503.804	41.533
CEMENT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
CNG STATIONS	30.5	915	923	1,184.425	96.960	26.0	807	815	1,045.015	85.548	29.7	891	899	1,153.793	94.453
CAPTIVE POWER	31.3	938	934	953.488	77.913	31.0	961	957	976.770	79.816	30.7	920	916	934.916	76.396
CAPTIVE POWER (TEXTILE)	33.1	993	988	776.564	64.020	33.4	1,036	1,031	810.693	66.825	32.5	974	970	762.061	62.817
ZERO-RATED INDUSTRIES	0.8	24	24	19.110	1.575	0.7	22	22	16.931	1.396	0.7	21	21	16.580	1.367
GENERAL INDUSTRIES	11.8	353	352	359.686	29.391	11.4	355	354	360.928	29.493	8.7	260	259	264.600	21.621
COMMERCIAL	4.7	141	141	176.547	12.783	4.5	138	138	172.443	12.486	4.5	136	136	169.363	12.263
DOMESTIC	68.5	2,056	2,057	846.055	(308.116)	61.2	1,898	1,900	781.288	(284.529)	62.0	1,860	1,861	765.397	(278.742)
SUB TOTAL 'B'	246.4	7,393	7,447	5,985.805	112.188	241.0	7,470	7,530	6,071.498	148.282	255.7	7,671	7,744	6,277.514	172.432
QUETTA (ONGDP)															
POWER - WAPDA	13.2	396	381	314.201	25.902	18.7	581	559	460.986	38.003	22.5	676	651	536.363	44.217
HABIBULLAH COASTAL POWER	3.0	89	86	110.129	9.015	3.1	97	93	119.307	9.767	3.4	101	97	124.408	10.184
CNG STATIONS	0.1	2	2	1.685	0.138	0.1	2	2	1.685	0.138	0.1	2	2	2.022	0.165
CAPTIVE POWER	1.3	39	37	38.188	3.120	1.2	37	35	35.942	2.937	0.8	24	23	23.587	1.927
GENERAL INDUSTRIES	3.0	89	86	107.131	7.757	2.5	78	75	93.849	6.795	2.4	72	69	86.301	6.249
COMMERCIAL	28.6	859	826	386.157	(70.191)	71.9	2,228	2,144	1,002.196	(182.166)	29.1	873	840	392.693	(71.379)
DOMESTIC	49.1	1,474	1,418	957.490	(24.257)	97.5	3,023	2,909	1,713.964	(124.526)	58.3	1,748	1,682	1,165.373	(8.635)
SUB TOTAL 'C'	969.7	29,091	29,764	22,775.427	535.462	1,039.5	32,224	32,925	24,818.874	608.843	1,034.6	31,037	31,820	24,480.292	834.811
TOTAL															

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SUI SOUTHERN GAS COMPANY LIM
STATEMENT OF GAS SALES
ERR Petition For FY 2019-20

Table # C-6

	July - December 2019						January - June 2020						TOTAL					
	MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million		MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million		MMCFD	MMCF	MMMBTU	Sales Rs Million	GDS Rs Million	
KARACHI (UNIT - A)																		
POWER - KESC	37.0	6,804	7,036	5,797,772	477,964		39.5	7,194	7,475	6,159,539	507,788		38.2	13,998	14,511	11,957,310	985,753	
POWER - BINGQASIM	76.5	14,074	14,810	12,203,522	1,006,050		62.2	11,313	11,982	9,872,852	813,911		69.4	25,387	26,792	22,076,374	1,819,961	
CEMENT	1.0	181	182	233,049	19,169		1.1	199	202	257,800	21,205		1.0	381	384	490,848	40,375	
FERTILIZER - Feedstock	57.2	10,527	11,092	3,327,716	861,102		45.4	8,263	8,729	2,618,825	677,665		51.3	18,790	19,822	5,946,541	1,538,767	
FERTILIZER - Power	2.6	469	495	504,918	41,259		1.7	307	324	330,655	27,019		2.1	776	818	835,574	68,278	
PAK STEEL	2.0	376	380	387,981	31,703		2.0	366	373	380,841	31,120		2.0	742	753	768,822	62,823	
CNG STATIONS	36.4	6,691	6,821	8,751,929	716,458		41.0	7,457	7,641	9,803,526	802,544		38.7	14,148	14,463	18,555,455	1,519,002	
CAPTIVE POWER	49.1	9,044	9,309	9,504,830	776,678		53.0	9,646	9,961	10,170,245	831,051		51.1	18,689	19,270	19,675,075	1,607,729	
ZERO-RATED INDUSTRIES	81.5	15,001	15,402	12,105,764	997,878		78.2	14,238	14,704	11,556,990	952,643		79.9	29,239	30,105	23,662,754	1,950,521	
GENERAL INDUSTRIES	72.4	13,316	13,659	10,720,323	883,676		70.1	12,750	13,105	10,300,141	849,041		71.2	26,066	26,744	21,020,464	1,732,717	
COMMERCIAL	77.1	14,182	14,515	14,819,634	1,210,572		83.7	15,240	15,664	15,992,714	1,356,829		80.4	29,422	30,179	30,812,348	2,517,800	
DOMESTIC	21.1	3,888	3,960	4,944,779	358,041		22.0	4,007	4,103	5,123,488	370,981		21.6	7,895	8,063	10,068,267	729,022	
SUB TOTAL 'A'	680.8	125,269	129,048	96,428,529	3,043,797		683.3	124,366	128,532	96,890,701	2,459,211		682.1	249,635	257,580	193,319,230	3,503,008	
SINDH (UNIT - B)																		
POWER - WAPDA	15.2	2,797	2,842	2,341,981	193,071		36.1	6,575	6,777	5,584,091	450,349		25.6	9,372	9,619	7,926,072	653,420	
NOORABAD POWER PLANT	18.9	3,483	3,546	2,922,182	240,903		20.0	3,640	3,709	3,056,409	251,968		19.5	7,123	7,256	5,978,591	492,871	
CEMENT	0.0	5	5	6,509	0,535		0.0	1	1	1,299	0,107		0.0	6	6	7,808	0,642	
CNG STATIONS	25.4	4,680	4,714	6,048,632	495,158		29.2	5,318	5,368	6,887,280	553,812		27.3	9,998	10,083	12,935,912	1,058,970	
CAPTIVE POWER	25.1	4,610	4,590	4,686,828	382,979		30.3	5,520	5,494	5,609,171	438,348		27.7	10,130	10,084	10,295,999	841,327	
ZERO-RATED INDUSTRIES	33.5	5,167	5,072	4,772,712	393,415		33.2	6,038	6,010	4,723,756	339,379		33.3	12,205	12,082	9,496,468	782,794	
GENERAL INDUSTRIES	1.1	196	191	149,801	12,348		0.8	153	153	120,185	9,907		1.0	349	343	269,986	22,255	
COMMERCIAL	9.9	1,828	1,818	1,855,751	151,641		11.3	2,062	2,055	2,097,918	171,429		10.6	3,889	3,872	3,953,670	323,070	
DOMESTIC	4.3	797	794	990,941	71,752		4.7	850	850	1,060,732	76,805		4.5	1,647	1,643	2,051,673	148,557	
SUB TOTAL 'B'	200.8	36,941	36,946	28,864,273	88,516		242.8	44,186	44,456	5,774,145	2,122,826		221.7	81,127	81,402	63,779,259	3,677,794	
QUETTA (ONGDP)																		
POWER - WAPDA	18.6	3,416	3,291	2,712,113	223,585		20.3	3,700	3,563	2,935,854	242,030		(0.0)	(0)	0	0,000	0,000	
HABIBULLAH COASTAL POWER	2.4	445	428	549,725	45,002		3.1	572	550	705,981	57,794		19.4	7,116	6,854	5,647,967	465,615	
CNG STATIONS	0.0	3	3	2,652	0,217		0.1	11	10	10,506	0,858		2.8	1,017	979	1,255,706	102,796	
CAPTIVE POWER	1.1	205	198	201,924	16,500		1.2	222	214	218,016	17,815		0.0	13	13	13,158	1,075	
GENERAL INDUSTRIES	2.8	519	500	624,394	45,211		2.9	535	515	642,664	46,534		1.2	427	411	419,940	34,315	
COMMERCIAL	33.1	6,092	5,868	2,742,705	498,533		48.8	8,882	8,546	3,994,616	726,090		2.9	1,054	1,015	1,267,058	91,745	
DOMESTIC	58.0	10,680	10,288	6,833,513	1,68,019		76.5	13,922	13,398	8,507,637	331,059		40.9	14,974	14,414	6,737,320	1,224,623	
SUB TOTAL 'C'													67.2	24,602	23,686	15,341,149	(529,078)	
Decrease in Sales Value and GDS due to Customers in Litigation																		
TOTAL	939.6	172,890	176,283	132,126,315	2,964,294		1,002.6	182,474	186,385	140,313,324	2,377,430		970.9	355,363	362,668	271,989,514	4,891,600	

SUI SOUTHERN GAS COMPANY LIMITED
BASIS / ASSUMPTIONS
RERR FOR FY 2019-20

Table # C-7

Exchange Parity Rs per US\$

Crude oil US\$ per Barrel

Average FOB Prices

Freight

Average C&F Prices

MMBTU/BBL

HSFO US\$ per M.Ton.

Average FOB Prices

Freight

Average C&F Prices

MMBTU per M.Ton.

Rs per MMBTU

SSGCL Average Cost of Gas

SNGPL Average Cost of Gas

Weighted Average Cost of Gas

Rs per MCF

Petition		Averages
Jul.-Dec.19	Jan.-Jun.20	
158.39	164.96	161.68
65.8672	65.7169	65.7921
0.5187	0.5187	0.5187
66.3859	66.2356	66.3108
5.6098	5.6098	
392.9990	384.6803	388.8397
4.3701	4.3701	4.3701
397.3691	389.0504	393.2098
40.7920	40.7920	
		618.40
		484.10
		548.17
		531.33

SUI SOUTHERN GAS COMPANY LIMITED
WEIGHTED AVERAGE COST OF GAS
FIELD WISE GAS PURCHASES
RERR FOR FY 2019-20

Table # C-8

	SSGCL TOTAL			
	MMCF	MMMBTU	Rs per MMBTU	Rs Million
Sui	39,451	37,795	473.09	17,881
Kandhkot	91	75	259.93	19
Rustam/Ubaro/Sher Ali/Chandik/Ghotki	244	211	780.00	165
Mari	58	42	242.51	10
Sari / Hundi	367	319	873.91	279
Maher / Mubarak Block / Sofia	4,395	4,733	400.37	1,895
Kunnar & Pasaki Deep / TAY	66,117	68,110	401.21	27,326
Adam X-1 / Hala	4,876	5,066	427.41	2,165
Pakhro / Noorai Jagir / Chutto-01	2,225	2,536	370.15	939
Zargoan	4,199	3,990	560.27	2,235
Bobi	791	884	616.50	545
Latif	4,379	4,390	426.50	1,872
Kirther (Rehman) / Rizq -EWT	12,735	11,187	815.30	9,121
Badin	16,878	17,049	419.78	7,157
Kadanwari	16,499	16,491	1,374.30	22,664
Miano	9,691	9,688	545.10	5,281
Sawan	8,477	8,489	546.69	4,641
Zamzama	4,199	3,350	530.41	1,777
Bhit	43,160	40,735	545.38	22,216
Mazarani	884	900	281.92	254
Khipro Block - Naimat Basal	95,357	93,061	808.57	75,246
Mirpurkhas Block - Kausar	28,445	30,381	795.76	24,176
Sujawal / Sujjal	5,634	5,949	400.85	2,385
Nur Bagla fields	1,423	1,538	401.30	617
Jakhro / Dachrapur / Gopang	169	190	392.95	75
Gambat Block - Wafiq/Shahdad-(XI)	25,933	24,627	401.53	9,889
Sinjhoro	10,719	10,878	401.00	4,362
Lakhu Langri	2	2	391.48	1
Aqeeq-1	125	131	391.48	51
Bitrism	289	298	391.48	117
Mitha	522	524	391.48	205
Excise duty			10.00	4,034
SSGCL Average input Cost of Gas	408,332	403,619	618.40	249,599
SNGPL Average input Cost of Gas	464,511	442,407	484.10	214,171
Weighted Average Cost of Gas				
(WACOG) Rs per MMBTU	872,843	846,027	548.17	463,771
Rs per MCF			531.33	

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF GAS PURCHASES

RERR FOR FY 2019-20

GAS FIELD	July/19				August/19				September/19			
	MMCFD	MMCF	MMMBTU	Rupees Million	MMCFD	MMCF	MMMBTU	Rupees Million	MMCFD	MMCF	MMMBTU	Rupees Million
Sui	115	3,580	3,429	1,591	108	3,343	3,205	1,486	107	3,210	3,075	1,426
Kandhkot	1	45	37	9	2	47	38	10	-	-	-	-
Rustam/Ubaro/Sher Ali/Chandik/Ghotki	4	122	106	82	4	122	106	82	-	-	-	-
Mari	1	30	22	5	1	29	21	5	-	-	-	-
Sari / Hundi	1	42	40	35	1	21	19	16	1	30	26	22
Maher / Mubarak Block / Sofia	14	449	483	190	12	359	387	152	14	420	452	178
Kunnar & Pasaki Deep / TAY	173	5,361	5,527	2,172	126	3,906	4,027	1,582	195	5,850	6,026	2,368
Adam X-1 / Hala	15	471	485	203	14	423	439	184	15	450	468	196
Pakhro / Noorai Jagir / Chutto-01	7	216	255	93	7	216	254	92	7	210	237	86
Zargoan	13	414	394	217	13	409	390	214	13	390	371	204
Bobi	3	82	94	58	3	101	114	70	2	60	67	41
Latif	20	622	625	262	17	534	539	226	12	360	360	151
Kirther (Rehman) / Rizq -EWT	32	1,001	884	706	35	1,094	961	768	35	1,050	922	737
Badin	22	692	774	318	32	986	1,059	435	50	1,500	1,502	617
Kadanwari	42	1,314	1,317	1,773	36	1,111	1,114	1,499	49	1,470	1,469	1,977
Miano	31	961	963	515	29	886	889	475	28	840	839	449
Sawan	10	321	323	173	9	283	286	153	28	840	841	450
Zanzama	11	355	283	147	11	348	278	145	14	420	335	175
Bhit	129	4,004	3,848	2,059	130	4,045	3,884	2,078	120	3,600	3,384	1,811
Mazarani	3	108	110	30	3	107	109	30	3	90	92	25
Khipro Block - Naimat Basal	177	5,487	4,740	3,752	183	5,660	4,952	3,920	285	8,550	8,465	6,700
Mirpurkhas Block - Kausar	136	4,222	4,798	3,756	131	4,066	4,621	3,617	68	2,040	2,122	1,661
Sujawal / Sujjal	16	481	506	199	15	471	495	195	17	510	539	212
Nur Bagla fields	4	111	119	47	2	66	71	28	5	150	162	64
Jakhro / Dachrapur / Gopang	3	89	100	39	3	81	91	36	-	-	-	-
Gambat Block - Wafiq/Shahdad-(XI)	60	1,848	1,774	697	66	2,045	1,915	753	60	1,800	1,710	672
Sinhoro	27	823	851	334	27	835	859	338	32	960	972	382
Lakhu Langri	0	1	1	0	0	1	1	0	-	-	-	-
Aqeeq-1	2	63	66	26	2	62	65	26	-	-	-	-
Bitrism	5	145	150	59	5	144	148	58	-	-	-	-
Mitha	8	262	262	103	8	261	261	102	-	-	-	-
Excise Duty												
Gross Gas Purchases	1,088	33,720	33,364	19,983	1,034	32,063	31,596	19,092	1,160	34,800	34,433	20,947

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF GAS PURCHASES
RERR FOR FY 2019-20

GAS FIELD	October/19				November/19				December/19			
	MMCFD	MMCF	MMMBTU	Rupees Million	MMCFD	MMCF	MMMBTU	Rupees Million	MMCFD	MMCF	MMMBTU	Rupees Million
Sui	107	3,317	3,178	1,474	107	3,210	3,075	1,426	107	3,317	3,178	1,474
Kandhkot	-	-	-	-	-	-	-	-	-	-	-	-
Rustam/Ubaro/Sher Ali/Chandik/Ghotki	-	-	-	-	-	-	-	-	-	-	-	-
Mari	-	-	-	-	-	-	-	-	-	-	-	-
Sari / Hundi	-	-	-	-	-	-	-	-	-	-	-	-
Maher / Mubarak Block / Sofia	1	31	27	23	1	30	26	22	1	31	27	23
Kunnar & Pasaki Deep / TAY	13	403	434	171	13	390	420	165	12	372	401	157
Adam X-1 / Hala	190	5,890	6,067	2,384	190	5,700	5,871	2,307	190	5,890	6,067	2,384
Pakhro / Noorai Jagir / Chutto-01	14	434	451	189	14	420	437	183	13	403	419	176
Zargoan	7	217	245	89	7	210	237	86	6	186	210	76
Bobbi	12	372	353	194	12	360	342	188	12	372	353	194
Latif	2	62	69	42	2	60	67	41	2	62	69	42
Kirther (Rehman) / Rizq -EWT	12	372	372	156	11	330	330	139	11	341	341	143
Badin	35	1,085	953	761	35	1,050	922	737	35	1,085	953	761
Kadanwari	50	1,550	1,552	637	50	1,500	1,502	617	50	1,550	1,552	637
Miano	48	1,488	1,487	2,001	47	1,410	1,409	1,897	47	1,457	1,456	1,960
Sawan	28	868	867	464	27	810	809	433	27	837	836	447
Zanzama	27	837	838	448	27	810	811	434	27	837	838	448
Bhit	13	403	322	168	13	390	311	162	12	372	297	155
Mazarani	120	3,720	3,497	1,871	120	3,600	3,384	1,811	115	3,565	3,351	1,793
Khipro Block - Naimat Basal	3	93	95	26	2	60	61	17	2	62	63	17
Mirpurkhas Block - Kausar	280	8,680	8,593	6,802	280	8,400	8,316	6,583	280	8,680	8,593	6,802
Sujawal / Sujjal	68	2,108	2,192	1,716	67	2,010	2,090	1,636	67	2,077	2,160	1,691
Nur Bagla fields	16	496	524	206	16	480	507	199	15	465	492	193
Jakhro / Dachrapur / Gopang	4	124	134	53	4	120	130	51	4	124	134	53
Gambat Block - Wafiq/Shahdad-(XI)	-	-	-	-	-	-	-	-	-	-	-	-
Sinjhoro	65	2,015	1,914	752	75	2,250	2,138	840	75	2,325	2,209	868
Lakhu Langri	31	961	973	382	30	900	911	358	30	930	941	370
Aqeeq-I	-	-	-	-	-	-	-	-	-	-	-	-
Bitrism	-	-	-	-	-	-	-	-	-	-	-	-
Mitha	-	-	-	-	-	-	-	-	-	-	-	-
Excise Duty	-	-	-	-	-	-	-	-	-	-	-	-
Gross Gas Purchases	1,146	35,526	35,136	21,362	1,150	34,500	34,105	20,673	1,140	35,340	34,938	21,216

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF GAS PURCHASES

RERR FOR FY 2019-20

GAS FIELD	January/20				February/20				March/20			
	MMCFD	MMCF	MMMBTU	Rupees Million	MMCFD	MMCF	MMMBTU	Rupees Million	MMCFD	MMCF	MMMBTU	Rupees Million
Sui	107	3,317	3,178	1,534	107	3,103	2,973	1,435	107	3,317	3,178	1,534
Kandhkot	-	-	-	-	-	-	-	-	-	-	-	-
Rustam/Ubaro/Sher Ali/Chandik/Chotki	-	-	-	-	-	-	-	-	-	-	-	-
Mari	-	-	-	-	-	-	-	-	-	-	-	-
Sari / Hundi	-	-	-	-	-	-	-	-	-	-	-	-
Maher / Mubarak Block / Sofia	1	31	27	23	1	29	25	22	1	31	27	23
Kunnar & Pasaki Deep / TAY	11	341	367	150	11	319	344	141	11	341	367	150
Adam X-1 / Hala	185	5,735	5,907	2,417	185	5,365	5,526	2,261	185	5,735	5,907	2,417
Pakhro / Noorai Jagir / Chutto-01	13	403	419	183	13	377	392	171	13	403	419	183
Zargoan	6	186	210	80	6	174	197	74	5	155	175	66
Bobri	11	341	324	186	11	319	303	174	11	341	324	186
Latif	2	62	69	43	2	58	64	40	2	62	69	43
Kirther (Rehman) / Rizq -EWT	10	310	310	136	10	290	290	127	10	310	310	136
Badin	35	1,085	953	792	35	1,015	891	741	35	1,085	953	792
Kadanwari	50	1,550	1,552	663	50	1,450	1,451	621	50	1,550	1,552	663
Miano	46	1,426	1,425	1,998	46	1,334	1,333	1,869	45	1,395	1,394	1,954
Sawan	26	806	805	448	26	754	753	419	25	775	774	431
Zamzama	26	806	807	449	26	754	755	420	25	775	776	432
Bhit	12	372	297	161	11	319	255	138	10	310	247	134
Mazarani	115	3,565	3,351	1,866	115	3,335	3,135	1,745	115	3,565	3,351	1,866
Khipro Block - Naimat Basal	2	62	63	18	2	58	59	17	2	62	63	18
Mirpurkhas Block - Kausar	275	8,525	8,440	6,951	275	7,975	7,895	6,502	275	8,525	8,440	6,951
Sujawal / Sujjal	67	2,077	2,160	1,759	66	1,914	1,991	1,621	65	2,015	2,096	1,707
Nur Bagla fields	15	465	492	201	15	435	460	188	15	465	492	201
Jakhro / Dachrapur / Gopang	4	124	134	55	4	116	126	51	4	124	134	55
Gambat Block - Wafiq/Shahdad-(XI)	-	-	-	-	-	-	-	-	-	-	-	-
Sinjhoro	75	2,325	2,209	904	75	2,175	2,066	846	75	2,325	2,209	904
Lakhu Langri	30	930	941	385	29	841	851	348	29	899	910	372
Aqeeq-1	-	-	-	-	-	-	-	-	-	-	-	-
Bitrism	-	-	-	-	-	-	-	-	-	-	-	-
Mitha	-	-	-	-	-	-	-	-	-	-	-	-
Excise Duty	-	-	-	-	-	-	-	-	-	-	-	-
Gross Gas Purchases	1,124	34,844	34,438	21,746	1,121	32,509	32,134	20,293	1,115	34,565	34,165	21,560
				344				321				342

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF GAS PURCHASES

RERR FOR FY 2019-20

GAS FIELD	April/20				May/20				June/20			
	MMCFD	MMCF	MMMBTU	Rupees Million	MMCFD	MMCF	MMMBTU	Rupees Million	MMCFD	MMCF	MMMBTU	Rupees Million
Sui	107	3,210	3,075	1,484	107	3,317	3,178	1,534	107	3,210	3,075	1,484
Kandhkot	-	-	-	-	-	-	-	-	-	-	-	-
Rustani/Ubaro/Sher Ali/Chandik/Ghotki	-	-	-	-	-	-	-	-	-	-	-	-
Mari	-	-	-	-	-	-	-	-	-	-	-	-
Sari / Hundi	-	-	-	-	-	-	-	-	-	-	-	-
Maheer / Mubarak Block / Sofia	1	30	26	23	1	31	27	23	1	30	26	23
Kunnar & Pasaki Deep / TAY	11	330	355	145	11	341	367	150	11	330	355	145
Adam X-1 / Hala	185	5,550	5,717	2,339	185	5,735	5,907	2,417	180	5,400	5,562	2,276
Pakhro / Noorai Jagir / Chutto-01	12	360	374	163	12	372	387	169	12	360	374	163
Zargoan	5	150	170	64	5	155	175	66	5	150	170	64
Bobi	10	300	285	163	10	310	295	169	9	270	257	147
Latif	2	60	67	42	2	62	69	43	2	60	67	42
Kirther (Rehman) / Rizq -EWT	10	300	300	131	10	310	310	136	10	300	300	131
Badin	35	1,050	922	767	35	1,085	953	792	35	1,050	922	767
Kadanwari	50	1,500	1,502	642	50	1,550	1,552	663	50	1,500	1,502	642
Miano	45	1,350	1,349	1,891	45	1,395	1,394	1,954	45	1,350	1,349	1,891
Sawan	24	720	719	400	24	744	743	414	23	690	689	384
Zamzama	25	750	751	418	24	744	745	415	24	720	721	401
Bhit	10	300	239	130	10	310	247	134	10	300	239	130
Mazarani	115	3,450	3,243	1,805	110	3,410	3,205	1,784	110	3,300	3,102	1,727
Khipro Block - Naimat Basal	2	60	61	18	2	62	63	18	2	60	61	18
Mirpurkhas Block - Kausar	275	8,250	8,168	6,727	275	8,525	8,440	6,951	270	8,100	8,019	6,604
Sujawal / Sujjal	65	1,950	2,028	1,652	65	2,015	2,096	1,707	65	1,950	2,028	1,652
Nur Bagla fields	15	450	476	195	15	465	492	201	15	450	476	195
Jakhro / Dachrapur / Gopang	4	120	130	53	4	124	134	55	4	120	130	53
Gambat Block - Wafiq/Shahdad-(XI)	-	-	-	-	-	-	-	-	-	-	-	-
Sinjhoro	75	2,250	2,138	875	75	2,325	2,209	904	75	2,250	2,138	875
Lakhu Langri	29	870	880	360	29	899	910	372	29	870	880	360
Aqeeq-1	-	-	-	-	-	-	-	-	-	-	-	-
Bitrism	-	-	-	-	-	-	-	-	-	-	-	-
Mitha	-	-	-	-	-	-	-	-	-	-	-	-
Excise Duty	-	-	-	-	-	-	-	-	-	-	-	-
Gross Gas Purchases	1,112	33,360	32,973	20,817	1,106	34,286	33,896	21,411	1,094	32,820	32,441	20,498
				330				339				324

SUI SOUTHERN GAS COMPANY LIMITED
STATEMENT OF GAS PURCHASES

RERR FOR FY 2019-20

GAS FIELD	Jul. - Dec.'19				Jan. - Jun.'20				TOTAL			
	MMCFD	MMCF	MMMBTU	Rupees Million	MMCFD	MMCF	MMMBTU	Rupees Million	MMCFD	MMCF	MMMBTU	Rupees Million
Sui	108.6	19,977	19,139	8,877	107.6	19,474	18,656	9,003	108.1	39,451	37,795	17,881
Kandhkot	0.5	91	75	19	-	-	-	-	0.3	91	75	19
Rustam/Ubaro/Sher Ali/Chandik/Ghotki	1.3	244	211	165	-	-	-	-	0.7	244	211	165
Mari	0.3	58	42	10	-	-	-	-	0.2	58	42	10
Sari / Hundi	1.0	185	163	141	1.0	182	156	138	1.0	367	319	279
Maher / Mubarak Block / Sofia	13.0	2,393	2,577	1,013	11.1	2,002	2,156	882	12.0	4,395	4,733	1,895
Kunnar & Pasaki Deep / TAY	177.2	32,597	33,584	13,197	185.2	33,520	34,526	14,130	181.1	66,117	68,110	27,326
Adam X-1 / Hala	14.1	2,601	2,700	1,132	12.6	2,275	2,366	1,033	13.4	4,876	5,066	2,165
Pakthro / Noorai Jagir / Chutto-01	6.8	1,255	1,439	523	5.4	970	1,096	415	6.1	2,225	2,536	939
Zargoan	12.6	2,318	2,203	1,212	10.4	1,881	1,787	1,024	11.5	4,199	3,990	2,235
Bobi	2.3	427	480	293	2.0	364	404	252	2.2	791	884	545
Latif	13.9	2,559	2,568	1,077	10.1	1,820	1,822	796	12.0	4,379	4,390	1,872
Kirther (Rehman) / Rizq -EWT	34.6	6,365	5,594	4,470	35.2	6,370	5,593	4,650	34.9	12,735	11,187	9,121
Badin	42.3	7,778	7,939	3,261	50.3	9,100	9,109	3,895	46.2	16,878	17,049	7,157
Kadanwari	44.8	8,249	8,250	11,107	45.6	8,250	8,242	11,557	45.2	16,499	16,491	22,664
Miano	28.3	5,202	5,204	2,784	24.8	4,489	4,485	2,497	26.6	9,691	9,688	5,281
Sawan	21.3	3,928	3,936	2,106	25.1	4,549	4,554	2,535	23.2	8,477	8,489	4,641
Zamzama	12.4	2,288	1,825	951	10.6	1,911	1,525	826	11.5	4,199	3,350	1,777
Bhit	122.5	22,535	21,348	11,423	114.0	20,625	19,388	10,793	118.2	43,160	40,735	22,216
Mazarani	2.8	520	529	147	2.0	364	371	107	2.4	884	900	254
Khipro Block - Naimat Basal	247.0	45,457	43,660	34,560	275.7	49,900	49,401	40,686	261.3	95,357	93,061	75,246
Mirpurkhas Block - Kausar	89.8	16,524	17,983	14,078	65.9	11,921	12,398	10,098	77.9	28,445	30,381	24,176
Sujawal / Sujjal	15.8	2,904	3,063	1,204	15.1	2,730	2,886	1,181	15.4	5,634	5,949	2,385
Nur Bagla fields	3.8	695	750	295	4.0	728	788	322	3.9	1,423	1,538	617
Jakhro / Dachrapur / Gopang	0.9	169	190	75	-	-	-	-	0.5	169	190	75
Gambat Block - Wafiq/Shahdad-(XI)	66.8	12,283	11,659	4,582	75.4	13,650	12,968	5,307	71.0	25,933	24,627	9,889
Sinjhoro	29.4	5,410	5,506	2,163	29.3	5,309	5,373	2,199	29.4	10,719	10,878	4,362
Lakhu Langri	0.0	2	2	1	-	-	-	-	0.0	2	2	1
Aqeeq-1	0.7	125	131	51	-	-	-	-	0.3	125	131	51
Bitrism	1.6	289	298	117	-	-	-	-	0.8	289	298	117
Mitha	2.8	522	524	205	-	-	-	-	1.4	522	524	205
Excise Duty				2,034								4,034
Gross Gas Purchases	1,119	205,948	203,573	123,273	1,118	202,384	200,046	126,327	1,119	408,332	403,619	249,599