

REQUEST FOR EXPRESSION OF INTEREST (EOI) FOR SELECTION OF AUDIT FIRM FOR AUDIT OF THE INLAND FREIGHT EQUALIZATION MARGIN (IFEM)

1. Oil & Gas Regulatory Authority (OGRA) intends to conduct audit of IFEM for three complete financial years FY 2020-21, FY 2021-22 & FY 2022-23;
2. OGRA invites interested QCR rated audit firms registered with ICAP and rated at category 'A' of State Bank of Pakistan's Panel of Auditors maintained under Section 35(1) of Banking Companies Ordinance, 1962, having minimum of twenty years' experience preferably in respect of oil sector supply chain and annual turnover of minimum Rs. 2 billion. The firm must have undertaken at least 10 audits per year during last three years in respect of each company having annual turnover of minimum Rs. 10 billion. Further, Audit firms who have conducted IFEM audit for the period of consecutive last five years shall not be eligible to apply;
3. Audit Firm(s) shall complete the assignment/submit the first draft report within 90 working days of the award of the contract. Thereafter the report shall be finalized in 20 working days.
4. Interested audit firm must provide detailed CV(s) of member(s) of core team (to be verified) highlighting relevant experience. The core team must comprise of one (01) lead partner of at least 25 years post qualification experience supported by a team of minimum 5 qualified professional accountants as team manager and at least 4 working professionals with each team manager. Further, no team member shall be replaced during audit period without prior consent of OGRA.
5. The applicant has not been declared blacklisted or debarred by any local procuring agency and/or foreign country, international organization, and/or other foreign institutions. The Applicant to provide the undertaking in the form of an affidavit to the above effect;
6. Method of selection will be Quality and cost basis in line with section 3 (b) of the PPRA Regulations of Consultancy Services Regulation, 2010. The Financial Bid should contain a lumpsum figure, inclusive of all charges including taxes and out of pocket expenses. Conditional bids shall not be accepted;
7. The Technical and Financial Proposals shall be received in separate sealed envelopes till March 28, 2024. Only Technical Proposals shall be opened in the first instance for technical evaluation on same date i.e; March 28, 2024 at 11:30 AM, in the presence of the bidders, or their authorized representatives, who may like to present bids to the Senior Executive Director (Finance) in OGRA office;
8. The Financial proposals of the Technically responsive/or qualified applicant, under regulation 3(B) of the PPRA Regulation of Consultancy Services Regulation 2010, shall be opened in the presence of the bidders on a date and time to be communicated to them in advance. The Financial bids should be valid for three months from date of opening of technical bids;
9. Each envelope containing the proposal, shall clearly be marked separately, "Technical Proposal" and "Financial Proposal";
10. OGRA reserves the right to reject all the bids as per rule 33 of the PPRA Rules, 2004.
11. Scope of work/TORs and evaluation criteria can be obtained from the OGRA website www.ogra.org.pk and PPRA website www.ppra.org.pk.

Senior Executive Director (Finance)
Oil & Gas Regulatory Authority
Plot No. 37 & 39, Mauve Area, Sector G-10/4, Islamabad.
Ph: 051-9108808, website: www.ogra.org.pk

Pubic Service Message

گیس لیج جان لیوا حادثات کا سبب بن سکتی ہے احتیاطی تدابیر یقینی بنائیں اور حادثات سے بچیں

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IFEM AUDIT for FY 2020-21, 2021-22, 2022-23, SCOPE OF WORK

IFEM Audit of Oil Marketing Companies (OMCs)

1. The IFEM audit with respect to OMCs will cover the following:

| Sr. # | Name of OMC | Abbreviation | office Location |
|--------------|--|---------------------|------------------------|
| i. | Pakistan State Oil Company Limited | PSO | Karachi |
| ii. | Shell Pakistan Limited | SPL | Karachi |
| iii. | Attock Petroleum Limited | APL | Rawalpindi |
| iv. | Total Parco Pakistan Limited | TPPL | Karachi |
| v. | Gas and Oil Pakistan Private Limited | GO | Lahore |
| vi. | Hascol Petroleum Limited | HPL | Karachi |
| vii. | BE Energy Limited | BEPL | Karachi |
| viii. | Puma Energy Pakistan Private Limited | PUMA | Karachi |
| ix. | Cnergyico Pk Ltd | CPL | Karachi |
| x. | Pak Arab Refinery Limited (Pearl Parco) | Pearl | Karachi |
| xi. | Taj Gasoline Private Limited | TGPL | Karachi |
| xii. | Flow Petroleum Private Limited | FPPL | Lahore |
| xiii. | Euro Oil Private Limited | EPPL | Lahore |
| xiv. | My Petroleum Private Limited | MPPL | Lahore |
| xv. | Zoom Petroleum Limited | ZPPL | Lahore |
| xvi. | Zoom Marketing Oils Private Limited | ZMPL | Lahore |
| xvii. | OTO Pakistan Private Limited | OPPL | Lahore |
| xviii. | OILCO Petroleum Private Limited | OILCO | Lahore |
| xix. | The Fuelers Private Limited | TFPL | Lahore |
| xx. | Al Noor Petroleum Private Limited | ANPPL | Lahore |
| xxi. | JINN Petroleum Private Limited | JPPL | Karachi |
| xxii. | Hi-Tech Lubricants Limited | HTLL | Lahore |
| xxiii. | Oil Industries Pakistan Private Limited | OIPPL | Karachi |
| xxiv. | Horizon Oil Company Private Limited | HOPL | Lahore |
| xxv. | Askar Oil Services (Private) Limited | AOSPL | Lahore |
| xxvi. | Quality 1 Petroleum Private Limited | QPPL | Islamabad |
| xxvii. | Exceed Petroleum Private Limited | EPPL | Islamabad |
| xxviii. | Kepler Petroleum Private Limited | KPPL | Karachi |
| xxix. | Fast Oil Private Limited | FOPL | Karachi |
| xxx. | LaGuardia Petroleum Private Limited | LPPL | Islamabad |
| xxxi. | Fossil Energy Private Limited (from July 2020) | FEPL | Karachi |
| xxxii. | Vital Petroleum Private Limited (from February 2021) | VPPL | Lahore |
| xxxiii. | Allied Petroleum Private Limited (from May 2020) | APPL | Lahore |
| xxxiv. | Max Fuels Private Limited (from February 2020) | Max-Fuel | Karachi |
| xxxv. | Best Petroleum Private Limited (from April 2020) | BPPL | Lahore |
| xxxvi. | Echo Oil Private Limited (from March 2023) | EOPL | Islamabad |

2. The scope of this audit will cover three financial years, as stated above, in respect of each OMC listed above. Reports prepared by the auditor for the purposes of this audit will be for the entire financial year (i.e; July – June). The scope for the audit of the statements of surplus/deficit in the freight pool for the above said period would be as follows:
- i.* To ensure that the surplus/deficit in the freight pool is determined on the net volume of products purchased, in equalized units, during the period from various supply sources. This treatment should be in line with the mechanism followed by the OMCs for inter-company settlement of differential between the notified IFEM and respective noted cost(s) which is also based on the net volume purchased by the OMCs.
 - ii.* To ensure that the IFEM recovery used in the statement of surplus/deficit in the freight pool would be based on the net volume purchased by the OMCs and not on the IFEM actually collected on the subsequent sale of the inventory.
 - iii.* To ensure that the primary transportation cost is determined by applying an average transportation cost per liter of each product moved during the period on the net volume purchased. The cost actually incurred on the subsequent movement of closing inventory is not to be considered as it is not ascertainable and the difference between the estimated and actual cost is not likely to be material.
 - iv.* To ensure that the extra margin recovered by OMCs on accounts of local purchases of Motor Gasoline (Mogas) & High-Speed Diesel (HSD) (other than PSO) has been passed back to the consumer through IFEM.
 - v.* To ensure that the losses incurred by OMCs on account of MOGAS movement [started from FY 2021-22] through pipeline have been computed based on actual data as per laid down mechanism and recovered through IFEM.
 - vi.* To ensure that actual amount of Premium on HSD imported by OMCs has been exactly recovered through IFEM.
 - vii.* To ensure that the net volume purchased by the OMCs does not include any volume that has been exported subsequently by the OMCs. As a result, the noted costs applicable to export volumes (based on their supply source) would be excluded from the noted cost used to determine the surplus/deficit in the freight pool. Further, the auditor would ensure that the actual transportation costs right from the supply source incurred on the aforementioned export volumes are also excluded from the transportation cost used to determine the surplus/deficit in the freight pool.
 - viii.* In a deficit supply envelope (south, mid or north), it is mandatory for the OMCs to meet the local demand of the supply envelope by first utilizing the product available locally. The remaining deficit volume would then be moved from the next nearest source.
 - ix.* To ensure that all primary freight payments (road movements) have been made after verification of:
 - Physical Reporting data – in case of non-compliance freight shall be disallowed. However, only in case of VPPL, APPL and Fossil, exemption from PR may be allowed for the specific period owing to the circumstances prevailed at that time i.e; pending renewal of license, signing of ICFS agreement etc. The transportation claim in respect of these OMCs however shall be considered only if it has been paid to 3rd party contractor.
 - VPPL: February 2021- January 2022
 - APPL: May 2020- January 2022
 - FEPL: July 2020- April 2023 .
 - Tracker reports– In case of non-compliance freight shall be disallowed.

- x. To ensure that all special area secondary freight payments have been made after verification of Tracker Reports- in case of non-compliance freight shall be disallowed.
 - xi. During the period of Covid-19, the physical reporting data non-availability be aligned with the OGRA directives/approval.
 - xii. To check that Mogas input in WOP is in line with the weightage/percentage of supplies share [upcountry moved total volume Local + Import] as defined in IFEM Meetings. In case of non-compliance, following shall be considered;
 - o In case total import volume of the OMC during the financial year is equal to or greater than the WOP input volume based on the defined percentage, no freight cost shall be allowed in respect of WOP' deficient volumes.
 - o In case the total import volume of the OMC during the financial year is less than the WOP input volume based on the defined percentage, road freight cost shall be allowed to the extent of such deficient volumes.
 - o In case OMC has no import during the year, road freight cost shall be allowed.
 - o The instances of non-compliance not covered above/the cases of exceptions, will be submitted to OGRA along with input by the Auditor for review.
 - xiii. To review all adjustments/deduction made by OGRA during the year in the monthly IFEM meeting (as communicated in Minutes of Meetings) or as per OGRA's directives / letters and reflect the same in the report 'statement of surplus/deficit'.
 - xiv. To compare the sales reported in a month with the product physically reported in respect of each OMC.
3. In the scenario where export of regulated fuel is made from a deficit supply envelope it is mandatory that first the local demand of supply envelope is met from the fuel available locally. After meeting the local demand, the remaining local fuel can then be used for exports. In case regulated fuel has to be moved from the next nearest source to meet the export customer demand the transportation cost involved in moving the regulated fuel from the next nearest source to the deficit supply envelope will be borne by the export customer and in no way it will be charged to the freight pool. This policy is adapted so that the Pakistani customer should pay the most optimized transportation cost for making product available in deficit area. In case exports are being made from a deficit area, the entire transportation cost of making export fuel available in deficit area will be borne by the export customers and in no way will be borne by the Pakistani customer. In this regard, the following transportation costs are to be recovered from the export customer and the freight pool is not to be burdened:

Ex-ARL Exports

| Product | Cost |
|---------|---|
| MOGAS | Keamari to Sihala road freight cost. |
| HSD | Keamari to Machike pipeline freight and Machike to Sihala road freight. |

i) Ex-PARCO Exports

| Product | Cost |
|---------|--|
| MOGAS | Keamari to Mehmoodkot road freight cost + PARCO Refinery Freight |
| HSD | Keamari to Mehmoodkot pipeline freight cost + PARCO Refinery Freight |

ii) Ex-Keamari Exports

| Product | Cost |
|---------|------|
| MOGAS | None |
| HSD | None |

4. In order to meet this objective, exports will only be made from supply sources specified by Oil and Gas Regulatory Authority (OGRA).

5. Record to be Prepared by the OMCs

- 5.1 A brief description of the statements to be prepared by the OMCs for the purpose of the audit is given below:

a) OMCs' Cost Data

Each OMC will prepare and provide the following:

- i. A statement of surplus/deficit in the freight pool duly signed by the authorized representative of the OMC showing net purchases, product-wise IFEM recoveries, noted cost, adjustments and the actual transportation costs incurred (as defined in Clause 1.12, 1.13 and 1.14 of the FPSM Operating Manual) and the surplus/deficit generated in their freight pool pertaining to primary transportation costs during the period under review.
- ii. Source and destination wise data for quantities of each product moved (from Refineries, installations/terminals and depots) and cost incurred thereon separately for each mode of transportation used.
- iii. Further to the point (ii) above, the OMC, for each financial year, shall prepare month wise statement of total volume of Mogas moved from south to north from all sources and shall calculate the quantity prescribed for WOP input based on the minutes of the meeting of the respective period.
- iv. Statement of differential cost impact in respect of all movement made through alternate/unapproved route.
- v. Statement of Transportation Cost in respect of secondary freight for special areas separately in respect of each product.
- vi. Statement of variance analysis of the estimated noted cost and actual noted cost on monthly basis as well as product of the OMCs physically reported at a depot location vs. actual sales at that location considering the stocks level as well.
- vii. Statement of Extra Margin earned and passed back through IFEM and the surplus/deficit generated therein, said surplus/deficit should be included in the surplus/deficit in freight pool. Statement of Extra Margin should not include any short recovery of Margin.
- viii. Extra Margin for the purpose of understanding is explained as the additional margin, if any, earned by an OMC other than PSO, computed as the difference between PSO's weighted average cost and ex-Refinery price of a specified product.
- ix. Statement of Mogas Pipeline Losses incurred and recovered through IFEM and the surplus/deficit generated therein, said surplus/deficit should be included in the surplus/deficit in freight pool. Statement of Mogas Pipeline Losses should not include any short recovery of Losses.
- x. Statement of HSD Premium differential actually incurred (as overseen by OGRA) and recovered through IFEM and the surplus/deficit generated therein, said surplus/deficit should be included in the surplus/deficit in freight pool.
- xi. Quantitative statement of product wise exports made from specific sources.
- xii. A statement showing adjustments made against primary transportation based on adjustments / reductions / deductions / disallowances on various accounts made by OGRA during the period.
- xiii. The statement showing product wise movements which are not in accordance with the physical reporting requirement / tracker report requirement / supply source integrity / approved mode of transportation.

- xiv. A statement showing status of receivable / payable related to Inter Company Freight Settlement at the closing date of each financial year.

Format for the provision of above-mentioned data, for the sake of uniformity, will be discussed and agreed with the Auditor in an on-boarding session / pre audit commencement meeting which shall be held between the Auditor and OGRA.

5.2 Audit Test Procedure

In respect of the statement of surplus/deficit in the freight pool relating to primary transportation costs, the auditors will perform the following procedures on a test basis;

- i. Checking the net volume of the products purchased by the Company, in equal units, during the period with the quantities reported in the monthly intercompany freight settlement reports and matching the quantities mentioned in these reports with the invoices of refineries / import documents (Bill of Lading, Goods Declaration etc).
- ii. Re-computing the primary transportation costs on volume purchased by applying the average transportation cost per liter of product moved during the period on the net volume purchased. The average transportation cost per liter is calculated with reference to quantities moved during the period. These are determined through calculation based on percentage of net purchases to total quantity of product transferred to an installation (including net purchases), where any, and total product quantity moved out. In the absence of any transfers from other installations, the quantity moved out is taken as the actual quantity moved out from the installation. The adequacy of the average transportation cost rate will be checked by checking the quantities moved with the available product movement records and the product transfer documents duly acknowledged by the recipients and the cartage contractors.
- iii. Re-computing the 'Secondary Freight Cost' in respect of Special Areas.
- iv. The costs of the product moved by road will be checked with the payments of cartage bills raised by the cartage contractors based on the approved transfer documents and applying the Oil and Gas Regulatory Authority (OGRA) notified road transportation rates. The destination mentioned on each transfer document will be taken as the place at which the products covered by this advice were delivered and the distances to these destinations were traced on a test basis with the approved RTDs.
- v. The costs of the product moved by rail will be checked with the payments of bills raised by Pakistan Railways based on the approved transfer documents and applying freight rates notified by Pakistan Railways.
- vi. The volume and costs of the product moved by pipeline will be checked with the payments of bills raised by PAPCO / PARCO based on the approved transfer documents and applying freight rates notified by PAPCO / PARCO and approved by OGRA.
- vii. Ensuring that export volumes and the related transportation cost is not included in the net volume purchased and the primary transportation cost respectively. In case the product is exported from an unapproved location the transportation costs related to such exports will be deducted from the transportation costs charged to the freight pool on the basis of the average transportation costs from all the modes incurred on the product.
- viii. Re-computing the IFEM and noted costs relating to the Company by applying the notified rates to the net volumes purchased from refineries and imports.
- ix. Checking the status of receivable / payable related to Inter Company Freight Settlement of the OMC.
- x. Checking the supply envelope integrity i.e. checking that the product has been moved to a destination from an approved source.
 - In case product has been moved from an incorrect or alternate source to a destination, without approval from OGRA, the respective OMCs shall be allowed the minimum

- approved cost for the destination while incremental cost of this movement will be borne by the respective OMC itself and will not be charged to the freight pool.
- The approved source destination combination movement (product-wise) within the country is given in **Table 1**; costs related to movements not covered in Table 1, which are allowed in the OMC's PMP OR for which specific approval by OGRA is available with the respective OMC should also be allowed.
 - In the event of exceptions identified in the sample size, the auditors will increase the sample size to arrive at the best estimate of the total error in the population based on an extrapolation of the sample results.
 - In case of back freighting, complete cost of movement will be borne by the respective OMC.
- xi. Checking that correct mode of transportation has been used in moving the product from source to destination. In case an expensive mode of transportation has been used, without approval from OGRA, the total cost will be borne by the respective OMC and will not be charged to the freight pool.
- xii. Checking that input of imported Mogas in WOP is in line with percentage / weightage defined in IFEM Meetings; the calculations will be based on the aggregate input volume of Mogas into WOP in the financial year and will be reconciled with PAPCO statements. The surplus balance of the WOP input at the close of a financial year, if any, shall be carried forward and adjusted in the subsequent period. In case input of Mogas has been lower than the defined percentage / weightage, the same shall be treated inadmissible mode of transportation and disallowed, as per criteria above.

Table 2: Fortnight-wise Mogas (imported) WOP input allocated in PMPs (attached)

- xiii. The Auditor shall also use the "Actual Transportation Cost Certificate" being submitted by OMCs for checking the supply source integrity.
- xiv. The Auditor shall evaluate for the reimbursement of differential freight cost in case product is moved from unapproved /alternate route. The auditor shall also analyze the variance, if any, between the estimated and actual noted cost of the OMC and compare the product physically reported vs. actual sales and stocks at a depot location of the OMCs during the month period.

Note 1:

For the purpose of testing the supply envelope integrity and mode of transportation used, testing will be performed based on samples determined, however doubled, in respect of the following depots:

- ❖ Quetta
- ❖ Taru Jabba
- ❖ Chak Pirana
- ❖ Machike
- ❖ Sahiwal
- ❖ Juglot
- ❖ Sihala

In respect of special area, there would be 100% cost check.

Table 1: Product-wise table of approved source-destination combination (attached)

b) Refinery Freight (IFEM)

6. Each OMC shall prepare and provide a statement of surplus/deficit in the refinery IFEM duly signed by the authorized representatives of each OMC, showing product-wise IFEM

recoveries, refinery freight incurred and the surplus/deficit generated in their freight pool pertaining to refinery freight during the year under review.

- 6.1 In respect of the statement of surplus/deficit in the refinery IFEM, the auditors will perform the following procedures:
 - i. Checking the net volume of products purchased, in equalized units, by the OMC during the period with the quantities reported in the monthly intercompany freight settlement reports and matching on a test basis the quantities mentioned in these reports with the invoices of the refineries / import documents (Bill of Lading, Goods Declaration etc).
 - ii. Ensuring that the net volume purchased does not include volumes exported by the OMC, if any.
 - iii. Checking the costs incurred by the OMC on account of IFEM relating to the refineries with the invoices raised by the refineries.
 - iv. Re-computing the IFEM and noted costs relating to refineries by applying the notified rates to the net volumes purchased from the refineries.

c) IFEM recoveries

7. Each OMC will prepare a statement of recoveries in accordance with clause 4.4 (summation of computation under sub clause 2 and 4 of clause 4.4) of the FPSM manual de-classified into:
 - i) OMCs IFEM
 - ii) Refinery IFEM

d) Computation of Surplus/Deficit

8. Following shall be particular part of the Audit report;
 - i. Surplus/Deficit in the Freight Pool of each OMC will be the difference between the OMC's noted cost relating to OMC's freight cost and attributable transportation cost by applying on average transportation rate to net volume purchased.
 - ii. Surplus/Deficit of Refinery IFEM of each OMC will be the difference between the OMC's noted cost relating to refinery freight and the refinery freight paid.
 - iii. Overall surplus/deficit shall be the sum of totals of d (i) and d (ii) above.

IFEM Audit of Refineries

1. The Audit with respect to Refineries will cover the following:
 - i. Pak Arab Refinery Limited (PARCO)
 - ii. Attock Refinery Limited (ARL)
 - iii. National Refinery Limited (NRL)
 - iv. Pakistan Refinery Limited (PRL)
 - v. Cnergyico Pk Limited formerly BYCO Pakistan Private Limited (CPL)
2. The scope of work for refineries and is outlined below:

1) PARCO

3. The Refinery Freight of PARCO is based on its various claims from Freight Pool as specified in the Ministry of Energy (Petroleum Division) Letter No. PL-3(471)/2001 dated June 29, 2001, PL-3(434)/2011 Vol XII dated May 31, 2011 and letter No. PL-3(434)/2011 dated

September 17, 2011. The Refinery Freight of PARCO which is notified by OGRA contains the recovery of following claims of PARCO from Freight Pool:

A. PARCO'S PRICE DIFFERENTIAL CLAIM (PDC) OF REGULATED PRODUCTS RECOVERED FROM FREIGHT POOL

4. The refinery will prepare the statement of surplus/deficit in the recovery of Price Differential Claim in accordance with the approved mechanism specified in the Ministry of Energy (Petroleum Division) Letter No. PL-3(471)/2001 dated June 29, 2001 and letter No. PL-3(434)/2011 dated May 31, 2011. PARCO's PDC is calculated (Kerosene Oil only) as the difference between its entitled price (Import Price Parity as defined in the Implementation Agreement (IA) signed between the Government of Pakistan (GOP) and Emirates of Abu Dhabi (EAD) and the Ex-Refinery price announced periodically by the Oil and Gas Regulatory Authority (OGRA) for the identical period, on sales of regulated products. In respect of the statement of surplus/deficit in the price differential, the auditors will perform the following procedures:

- Checking the volume of equalized products sold by the refinery during the period with the volume reported in the monthly intercompany freight settlement reports compiled from the product upliftment data received independently from the refinery and OMCs.
- Matching the volume mentioned in the intercompany freight settlement report with the volume shown on the invoices of the refinery.
- Checking the computation of the entitled price based on the formula mentioned in Annexure VIII of the Petroleum Policy 1994 and as provided in the IA between the GOP and EAD.
- Checking the computation of the Inland Freight Equalization Margin (IFEM) recovered by applying the rates of PDC recovery, as notified by OGRA, on the volumes sold.
- Auditor to provide Surplus/(deficit) position of PARCO's IPP Claim for the period.

B. PARCO'S CRUDE OIL TRANSPORTATION COST RECOVERED FROM FREIGHT POOL

5. The refinery will prepare the statement of surplus/deficit in the recovery of PARCO's Crude Oil transportation cost claim from Karachi to Mehmood Kot (KMK) on proportionate basis on certain products in accordance with the approved mechanism specified in the Ministry of Energy (Petroleum Division) Letter No. PL-3 (434)/2011 dated September 17, 2011 and ECC decision dated 21 March 2014. Crude Oil Transportation Cost claim on proportionate basis for any given month is calculated for various MCR products by applying their proportionate share in MCR production to transportation cost incurred by MCR in moving the Crude oil by KMK Pipeline. As per ECC decision dated August 07, 2012, PARCO crude transportation claim on HOBC was excluded from October 01, 2012. Further, ECC vide its decision dated March 21, 2014 approved the reimbursement of crude transportation cost to PARCO on HSD. In respect of the statement of surplus/deficit in the Crude Oil Transportation Cost claim, the auditors will perform the following procedures:

- Checking the crude oil quantity transported through pipeline from Karachi to Mehmood Kot and receipt at Mid Country Refinery on a monthly basis.
- Checking the prevailing pipeline tariff from Karachi to Mehmood Kot (KMK).
- Checking the production of various products by Mid Country Refinery (MCR) on monthly basis.
- Checking the computation of Crude Oil Transportation cost claim on proportionate production slate basis.

- Checking the volume of equalized products sold by the refinery during the period with the volume reported in the monthly intercompany freight settlement reports compiled from the product upliftment data received independently from the refinery and OMCs.
- Matching the volume mentioned in the intercompany freight settlement report with the volume shown on the invoices of the refinery.
- Checking the computation of the Inland Freight Equalization Margin (IFEM) recovered on equalized products by applying the rates of Crude Oil Transportation Claim recovery, as notified by OGRA the volumes sold.
- Auditor to provide Surplus/(deficit) position of PARCO's Crude Oil Transportation claim for the period.

2) ARL

A. ARL'S CRUDE FREIGHT

8. The refinery will prepare the statement of surplus/deficit in the freight pool in accordance with the approved mechanism provided in the Ministry of Energy (Petroleum Division) Letter No. PL-3(471)/2001 dated June 29, 2001. ARL is entitled to claim transportation expenses incurred on conveyance of crude petroleum from the southern region to its refinery, for processing of regulated products (as defined in clause 1.13 of FPSM). The surplus/deficit is calculated as the difference between recoverable IFEM and actual transportation cost.
9. In respect of the statement of surplus/deficit in the freight pool, the auditors will perform the following procedures on a test basis:
 - Checking the volume of equalized products sold by the refinery during the year with the product uplift reports prepared by the refinery and also match the quantities mentioned in these reports with the invoices raised by the refinery.
 - Matching the volume mentioned in the uplift reports with the volume shown on the invoices of the refinery.
 - Checking the computation of the IFEM on the net volume sold by applying notified rates to these volumes.
 - In respect of the crude moved by road, check the quantities moved from the suppliers' invoices and delivery advices duly acknowledged by the recipients and the cartage contractors. The costs of crude moved by road will be checked with the payments of the cartage bills raised by the cartage contractors based on the approved delivery advices and applying the agreed road freight rates and after accounting for the deductions admissible under the agreements with the contractors.
 - In respect of movement by pipeline, check the quantities moved with the delivery advices duly acknowledged by the recipients. The costs of the crude moved by the pipeline will be checked with the bills of pipeline operator for pipeline freight which included the charges for the minimum quantity billed under the take or pay clause of their agreement with the pipeline operator.
 - The recovery of freight cost from the suppliers in accordance with the Ministry of Energy (Petroleum Division) Letter No. DGO-D.S (16)/98 dated February 22, 2000 will be checked with the payments received based on the notified rates of transportation.
 - The closing inventory of crude oil and finished products will be checked with the inventory records of the refinery. The cost attributable to the closing inventory of finished products will be recomputed by applying the average freight cost per liter of crude purchased during the year to the estimated volume of crude oil required to produce this inventory based on the average yield ratio.

- Ensuring that the cost of unregulated products is excluded from the total transportation cost calculated -on the basis of average yield ratios as per directives of Ministry of Energy (Petroleum Division), contained in their letters No.PL- 3(471)/2001 dated March 20, 2002 and No.PL-3(457)/2007 dated July 20, 2007.
- The average yield ratio of crude oil to the regulated products will be recomputed based on the refinery provided data of volume consumed of crude oil and the volume of the regulated products produced therefrom during the year ended.

3) Cnergyico

A. CNERGYICO'S SPM OPERATIONAL COST RECOVERY FROM FREIGHT POOL

10. The refinery will prepare statement of operational cost recovery of **Cnergyico's Single Point Mooring (SPM)** claim considering only for regulated products on proportionate basis in accordance with the approved mechanism specified in the ECC decision No. 216/26/2020 dated 3rd June, 2020, Ministry of Energy (PD) Ref. letter No. PL-Ref 1(2)/2020 (Byco SPM) dated 22nd June, 2020 and in light of policy guidelines of MoE(PD) issued vide No. PL-3(457)/2021 Vol-74 dated 3rd June 2022.
11. SPM operational cost allocation will be calculated for various products by applying their proportionate share in total Crude intake for any given fortnight/month incurred for SPM.
12. In respect of statement of surplus/deficit in the operational cost claim, the auditors will perform following procedures:
 - i) Checking crude oil quantity transported through SPM pipeline on a monthly basis with supporting documents i.e. GD Note, HDIP report, surveyor report, custom documents etc.
 - ii) In case multiple batches of pumping from one vessel, Time log & quantity statement of each lot should be checked, time log and statement of quantity of each parcel shall be duly signed and stamped by the ship surveyor and applicant surveyor as well.
 - iii) Checking the total operating cost of SPM per ton & compare with PARCO' Rate to calculate deficit/surplus as considered by Federal Government/competent Authority from time to time.
 - iv) The expense head not covered as operating cost as per relevant IAS will be not considered as SPM operational cost.
 - v) Checking the applicable volume of each lot/shipment is shore tanks received quantity or BL quantity whichever is less. Report of refinery daily feed/throughput and its production.
 - vi) Checking the production of various products by BYCO (Cnergyico) on monthly/fortnightly basis.
 - vii) Checking the computation of SPM operational cost claim based on production basis.
 - viii) Analytical review of expenses included in SPM operational cost with respect to its mathematical accuracy, relevance and reliability.
 - ix) Auditor to provide the statement of SPM operational cost claim for the periods.

4) HSD Sulphur Differential

13. Ministry of Energy (Petroleum Division) /MEPD vide its letter ref: PL-3(457)/2013- dated 28 February, 2013 had advised that the Refineries, not producing HSD 0.05% Sulphur, will have to deposit the surplus differential between PSO's Import price less ocean losses (which was fixed as Ex-Refinery price) and IPP price as per the formula specified in above letter, to pass

on the benefit to the consumer through IFEM. In continuity of this letter, MEPD vide its letter of even number dated November 17,2020 advised the refineries that production less than HSD Euro -V (10 PPM) will not be allowed.

14. During the audit period following Refineries were not producing HSD Euro -V (10 PPM).

- Attock Refinery Limited (ARL)
- National Refinery Limited (NRL)
- Pakistan Refinery Limited (PRL)
- Pakarab Refinery Limited (PARCO)
- Cnergyico Pakistan Limited (CPL/formerly Byco)

15. The refineries will prepare the statement of surplus in accordance with the approved mechanism provided by Ministry of Energy (Petroleum Division) in compliance of above-mentioned policy guidelines. In respect of the statement of surplus/deficit, the auditors will perform the following procedures on a test basis:

- Checking the volume of HSD sold by the refinery during the year with the product uplift reports prepared by the refinery and also match the quantities mentioned in these reports with the invoices raised by the refinery.
- Matching the volume mentioned in the uplift reports with the volume shown on the invoices of the refinery.
- Checking the computation of HSD Sulphur differential as per specified formula as conveyed vide above referred letters dated February 28, 2013 and November 17, 2020.
- Checking the computation of surplus on the net volume sold.
- Checking the payments made against HSD sulphur Differential with the amount as approved by OGRA.

5) HSD Premium Differential

16. OGRA vide its letter ref: OGRA-10-12(06)/2021 dated May 09, 2022 has provided ECC approved mechanism for recovery of premium differential on HSD.

- Checking the volume of HSD sold by the refinery during the period with the product uplift reports prepared by the refinery and also match the quantities mentioned in these reports with the invoices raised by the refinery.
- Matching the volume mentioned in the uplift reports with the volume shown on the invoices of the refinery.
- Checking the computation of premium differential as per specified formula.
- Checking the computation of premium differential sold on the net volume sold.
- Checking the payments made against HSD Price Differential with the amount as approved by OGRA.

6) Mogas RON Differential Surplus

17. MEPD vide its letter ref: PL-9(544)/2015 dated September 05, 2016, had advised mechanism of pricing for Refineries producing Mogas below 92 RON and advised to pass on the differential to the consumer. Mogas pricing based on 92 RON was initiated effective December 1, 2016, accordingly surplus was generated from the same date in case the refineries produce

the RON below RON 92. Further, MEPD vide its letter No. PL-3(457)/2020 dated November 17, 2020 also advise to apply the discount adjustment factor in case the Mogas is produced by the refineries below Euro-V.

18. During the audit period following Refineries were not producing Mogas 92 RON and in case of MOGAS sulphur, NRL was producing less than Euro -V product during the period:
- Attock Refinery Limited
 - National Refinery Limited
 - Pakistan Refinery Limited
19. The refineries will prepare statement of surplus in accordance with the approved mechanism provided by the Ministry of Energy (Petroleum Division) through the above-mentioned policy guidelines letter. In respect of the statement of surplus the auditors will perform the following procedures on a test basis:
- Verification of the RON of Mogas produced by Refinery on a fortnightly basis, through test reports.
 - Checking the volume of Mogas sold by the refinery during the year with the product uplift reports prepared by the refinery and also match the quantities mentioned in these reports with the invoices raised by the refinery.
 - Matching the volume mentioned in the uplift reports with the volume shown on the invoices of the refinery.
 - Checking the computation of Mogas 92 Ron differential as per policy guidelines conveyed through above referred letters dated September 05, 2016 and November 17,2020.
 - Checking the computation of surplus on the net volume sold.
 - Checking the adjustments/payments made against Mogas RON and sulphur Differential with the amount allocated by OGRA.

7) Refinery Regulatory Duty

20. MEPD vide its letter ref: PL-3(457)/2015-55 dated July 15, 2015 had conveyed ECC approved mechanism for recovery of Refinery Regulatory Duty.
21. The refineries will prepare statement of surplus in accordance with approved mechanism provided by the Ministry of Energy (Petroleum Division) through the above-mentioned policy guidelines. In respect of the statement of surplus the auditors will perform the following procedures on a test basis:
- Verification of crude import volumes and payments of custom/regulator duty paid during the period.
 - Checking the consumption of crude oil and yields of all petroleum products.
 - Checking that regulatory duty allocated to petroleum products is in line with the weightage of actual yield of petroleum products.
 - Checking the product wise under / over recovery of custom/regulatory duty.
 - Checking the adjustments/payments made against custom/regulatory duty with the amount allocated by OGRA.

Deliverables

The auditors shall be required to submit the following as part of Audit report to OGRA:

- 1) A report on the surplus/deficit in the freight pool including disclosure of adjustments (recoveries or reimbursements) made by OGRA for the audit period as reflected in the statement of surplus/deficit in the freight pool prepared by each OMC.
- 2) A report on the surplus/deficit in the refinery IFEM including disclosure of adjustments (recoveries or reimbursements) made by OGRA for the audit period as reflected in the statement of surplus/deficit in the refinery IFEM prepared by each OMC.
- 3) A report on the extra margin earned by OMC and its adjustment against the freight pool and net surplus / deficit as reflected in the statement of extra margin earned by each OMC.
- 4) A report to OCAC on surplus in refineries regulatory duty, recoverable from refineries, and its adjustment/offsetting under pricing mechanism/freight pool against OMC or refineries claim as decided by OGRA for the audit period.
- 5) A report on surplus/deficit in the price differential for the audit period as reflected in the statement of surplus/deficit in the price differential prepared by the refinery.
- 6) A report on the surplus/deficit generated in their freight pool pertaining to crude transportation costs for the audit period as reflected in their statement of surplus/deficit in the freight pool prepared by the refinery.
- 7) A report on the surplus generated and payments made with respect to HSD Price Differential and net surplus/deficit as reflected in their statement of HSD Price Differential by the refinery.
- 8) A report on the surplus generated and adjustments / payments made with respect to Mogas RON Differential and net surplus/deficit as reflected in their statement of Mogas RON Differential by the refinery.
- 9) A report on the HSD premium in respect of OMCs as per actual figures vs. recovered through OMCs.
- 10) A report on the MOGAS operational losses actually incurred/claimed by the OMCs vs. recovered through IFEM.
- 11) The report on deductions/disallowances/ adjustment passed by OGRA during the audit period.
- 12) A report highlighting OMC wise movements that violate physical reporting requirement / tracker report requirement / supply source integrity / approved mode of transportation by comparing Actual Transportation Certificates with approved product movement plans and the impact of such movements on freight pool.
- 13) A report detailing exports made by OMCs and the associated transportation cost recovered from the export customer.
- 14) A report on variance of actual noted cost vs provisional noted cost in respect of each OMC together with OMCs product physically reported vs. actual sales and stocks at a depot location.
- 15) A consolidated statement of surplus/deficit in the OMCs freight pool for transportation costs, recoveries under the FPSM scheme and the net surplus or deficit in the freight pool for the audit period.
- 16) A consolidated statement of surplus/deficit in the refinery IFEM outlining refinery costs, recoveries under the FPSM scheme and the net surplus or deficit in the refinery IFEM for the audit period.
- 17) A consolidated statement of surplus generated and payments made with respect to HSD Price Differential and net surplus/deficit for the audit period.
- 18) A consolidated statement of surplus generated and adjustments / payments made with respect to Mogas RON Differential and net surplus/deficit for the audit period.
- 19) A consolidated statement of surplus generated and adjustments / payments made with respect to Refinery Regulatory Duty and net surplus/deficit for the audit period.

- 20) A consolidated statement of status of receivable / payable related to Inter Company Freight Settlement.
- 21) A consolidated statement pertaining to Special Area Secondary Freight in in respect of OMCs.

Deliverables in respect of Cnergyico SPM

- 22) Total SPM Operating cost allowable & allocation on regulated product only as per MoE(PD) directives.
- 23) Report showing total SPM operating cost & compare with PARCO pipeline tariff.
- 24) Consolidated net receivable/ payable report.

Duration of Audit

In order to ensure a timely and efficient audit process, following timelines have to be followed:

- OMCs/refineries are expected to provide the required data at the time of commencement of audit / deployment of audit team.
- The audit team is expected to provide draft Audit reports to the respective OMC/ Refinery and OGRA within 90 working days from commencement of audit.
- Each OMC/refinery is required to provide confirmation / observations on the draft Audit Reports provided by the Auditor within 20 working days of receiving them and the same shall be discussed with the Auditor. If the observations are not resolved, OGRA, upon request by the auditee, shall call a joint meeting for discussion and to streamline the process.
- The auditor shall after receive the confirmation/ review consideration, as the case may be, shall issue the final draft report at the earliest possible.

Table 1: Product-wise table of approved source-destination combination**HSD**

| Destination | Source | Mode |
|--------------------|--|------------------------|
| CTL | SIH | Road |
| JGT | SIH | Road |
| TJB | MCH via Road, SIH & MHK via Road or Rail | Road / Rail |
| KHT** | MHK, SIH | Road |
| SRNG* | MHK | Road |
| FAQ* | MCH, SIH | Road |
| SIH | ARL via Pipeline or Road, MCH via Road, MHK via Rail | Road / Pipeline / Rail |
| CPI | MHK via Rail, MCH via Road | Road / Rail |
| MCH | MHK, KMR | Pipeline |
| GAT/FBD | MHK, KMR | Pipeline |
| HBD* | MCH, GAT | Road |
| KND* | GAT | Road |
| KJM* | MHK | Road |
| SWL* | MHK, GAT | Road |
| MHK | MCR, KMR | Pipeline |
| SSH* | MHK | Road |
| VHR | MHK | Road |
| SKP | KMR | Pipeline |
| SNG* | SKP | Road |
| DLP* | KMR, BYCO/CPL, ENAR | Road |
| QTA | SKP | Road |
| KZD* | KMR, BYCO/CPL | Road |
| KMR | BYCO/CPL via Road, ENAR via Road | Road |
| ZOT/PQA | BYCO/CPL, ENAR | Road |

* For OMCs having Depot at the location

** Kohat (KHT) depot was included as virtual depot in IFEM effective October 1, 2021

Mogas

| Destination | Source | Mode |
|--------------------|---|-----------------|
| CTL | SIH | Road |
| JGT | SIH | Road |
| TJB | SIH, MCH***, MHK, KMR, CPL | Road/Pipeline |
| KHT** | KMR, BYCO/CPL, MHK, SIH | Road |
| FAQ* | SIH, MHK, KMR, BYCO/CPL, MCH*** | Road |
| SRNG* | KMR, BYCO/CPL, MHK | Road |
| SIH | KMR, BYCO/CPL, MHK, SIH, MCH*** via Road ARL via Pipeline or Road | Road / Pipeline |
| CPI | KMR, BYCO/CPL, MHK, MCH*** | Road |
| MCH | KMR, BYCO/CPL, MHK Via Road & Pipeline | Road / Pipeline |
| GAT/FBD | KMR, BYCO/CPL, MHK via Road & Pipeline | Road / Pipeline |
| HBD* | KMR, BYCO/CPL, MHK, MCH***, GAT*** | Road |
| KND* | KMR, BYCO/CPL, MHK, GAT*** | Road |
| KJM* | KMR, BYCO/CPL, MHK | Road |
| SWL* | KMR, BYCO/CPL, MHK, GAT*** | Road |

| | | |
|------|---|-----------------|
| MHK | KMR, BYCO/CPL, MCR Via Road & KMR, MCR via Pipeline | Road / Pipeline |
| SSH* | KMR, BYCO/CPL, MHK | Road |
| VHR | KMR, BYCO/CPL, MHK | Road |
| SKP | KMR, BYCO/CPL, via Road & KMR via Pipeline | Road / Pipeline |
| SNG* | KMR, BYCO/CPL, SKP*** | Road |
| DLP* | KMR BYCO/CPL, | Road |
| QTA | KMR BYCO/CPL, SKP*** | Road |
| KZD* | KMR BYCO/CPL, | Road |
| KMR | KMR, BYCO/CPL, ENAR | Road |

* For OMCs having Depot at the location

** Kohat (KHT) depot was included as virtual depot in IFEM effective October 1, 2021

*** Road movement from MCH, GAT & SKP allowed for product delivered at MCH, GAT & SKP via Pipeline only

SKO

| Destination | Source | Mode |
|-------------|---------------|------|
| CTL | SIH | Road |
| JGT | SIH | Road |
| TJB | SIH, MHK | Road |
| KHT** | SIH, MHK | Road |
| FAQ* | SIH, MHK | Road |
| SIH | SIH, MHK | Road |
| CPI | SIH, MHK | Road |
| MCH | MHK | Road |
| GAT / FBD | MHK | Road |
| HBD* | MHK | Road |
| KND* | MHK | Road |
| KJM* | MHK | Road |
| SWL* | MHK | Road |
| MHK | MCR | Road |
| SSH* | MHK | Road |
| VHR | MHK | Road |
| SKP | KMR | Road |
| SNG* | KMR | Road |
| QTA | KMR | Road |
| KMR | KMR, BYCO/CPL | Road |

* For OMCs having Depot at the location

** Kohat (KHT) depot was included as virtual depot in IFEM effective October 1, 2021

LDO

| Destination | Source | Mode |
|-------------|----------|------|
| JUG | SIH | Road |
| FAQ | SIH | Road |
| TJB | SIH | Road |
| SIH | SIH | Road |
| CPI | SIH, MHK | Road |
| KND* | SIH, MHK | Road |

| | | |
|------|-----|------|
| FBD | MHK | Road |
| KJM* | MHK | Road |
| SWL* | MHK | Road |
| HBD* | MHK | Road |
| MHK | MCR | Road |
| MCH | MHK | Road |
| SSH* | MHK | Road |
| SKP | KMR | Road |
| KMR | KMR | Road |

* For OMCs having Depot at the location

Table 2: Fortnight-wise Mogas (imported) WOP input allocated in PMPs

| Period | Allocation |
|------------------|-------------------|
| Dec, 2021 2nd FN | 10% |
| Jan, 2022 1st FN | 15% |
| Jan, 2022 2nd FN | 20% |
| Feb, 2022 1st FN | 30% |
| Feb, 2022 2nd FN | 35% |
| Mar, 2022 1st FN | 35% |
| Mar, 2022 2nd FN | 35% |
| Apr, 2022 1st FN | 35% |
| Apr, 2022 2nd FN | 25% |
| May, 2022 1st FN | 0% |
| May, 2022 2nd FN | 0% |
| Jun, 2022 1st FN | 0% |
| Jun, 2022 2nd FN | 0% |
| Jul, 2022 1st FN | 0% |
| Jul, 2022 2nd FN | 0% |
| Aug, 2022 1st FN | 30% |
| Aug, 2022 2nd FN | 30% |
| Sep, 2022 1st FN | 30% |
| Sep, 2022 2nd FN | 30% |
| Oct 2022 1st FN | 35% |
| Oct 2022 2nd FN | 35% |
| Nov 2022 1st FN | 35% |
| Nov 2022 2nd FN | 35% |
| Dec, 2022 1st FN | 35% |
| Dec, 2022 2nd FN | 40% |
| Jan, 2023 1st FN | 40% |
| Jan, 2023 2nd FN | 40% |
| Feb, 2023 1st FN | 0% |
| Feb, 2023 2nd FN | 0% |
| Mar, 2023 1st FN | 0% |
| Mar, 2023 2nd FN | 0% |
| Apr, 2023 1st FN | 35% |
| Apr, 2023 2nd FN | 25% |
| May, 2023 1st FN | 25% |
| May 2023 2nd FN | 30% |
| Jun 2023 1st FN | 35% |
| Jun 2023 2nd FN | 35% |

SELECTION OF AUDIT FIRM
AUDIT OF THE INLAND FREIGHT EQUALIZATION MARGIN (IFEM)

(TECHNICAL - EVALUATION CRITERIA)

| | Clause | Description | Points |
|----|--|--|--|
| 1. | Profile of the Audit Firm and the Team | <p>a. Organizational structure of the firm and Presence of the firm in major cities of Pakistan</p> <p>b. Permanent Manpower strength</p> <p>c. The composition of the team(s) which will be deployed to complete the assignment in due time.</p> <p style="text-align: center;">Sub-Total</p> | <p>05</p> <p>15</p> <p>25</p> <p style="text-align: center;">45</p> |
| 2. | Relevant Experience of Organization and Team | <p>a. Total work experience of the firm in undertaking audits assignment.</p> <p>b. Total overall exposure and competency of the firm in undertaking the jobs relating to statutory audit in oil sector <i>[List down the name of the listed/public Ltd/ Pvt Ltd companies audited during last five years].</i></p> <p>c. Specific experience of the firm/team member in undertaking IFEM audit.</p> <p style="text-align: center;">Sub-Total</p> | <p>10</p> <p>15</p> <p>10</p> <p style="text-align: center;">35</p> |
| 3. | Work Protocol | <p>a. Comprehensive approach/timelines for completion of assignment.</p> <p>b. Complete methodology highlighting critical milestone's</p> | <p>10</p> <p>10</p> |
| | s | TOTAL MARKS/POINTS | 100 |

NOTE; Minimum requirements for pre-qualification shall be 70 Marks/Points