

OGRA-6(2)-1(3)/2017-(RFRR)

IN THE MATTER OF

SUI NORTHERN GAS PIPELINES LIMITED

**MOTION FOR REVIEW AGAINST AUTHORITY'S
DETERMINATION OF FINAL REVENUE REQUIREMENT FOR
FY 2016-17**

**UNDER
OIL AND GAS REGULATORY AUTHORITY ORDINANCE, 2002 AND
NATURAL GAS TARIFF RULES, 2002**

DECISION

March 12, 2018

Before:-

**Ms. Uzma Adil Khan, Chairperson
Mr. Noorul Haque, Member (Finance)
Dr. Abdullah Malik, Member (Oil)**



(i)

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1. Background:

- 1.1. Sui Northern Gas Pipelines Limited (SNGPL) is a public limited company incorporated in Pakistan and is listed on Pakistan Stock Exchange. It is engaged in the business of construction and operation of gas transmission and distribution pipelines, sale of natural gas and compressed natural gas, and sale of gas condensate (as a by-product). SNGPL is also engaged in the business of Re-gasified liquefied natural gas (RLNG), in accordance with the decisions of the Federal Government (FG).
- 1.2. The Authority, under Section 8(1) of the OGRA Ordinance, 2002 (the Ordinance) determined the Final Revenue Requirement of SNGPL for FY 2016-17 (the said year) vide order dated October 06, 2017 at Rs. 263,214 million and shortfall at Rs. 87,575 million translating into an increase of Rs. 211 per MMBTU in the average prescribed price.
- 1.3. Being aggrieved by this determination, SNGPL filed motion for review on November 03, 2017 under Section 13 of OGRA Ordinance, 2002 read with Rule 16 of Natural Gas Tariff Rules, 2002 (the NGT Rules). SNGPL challenged various capital and revenue cost components along with UFG as under;

a) **UFG Benchmark**

b) **Operating Revenues & Expenses**

1. **Late Payment Surcharge Income**
2. **Finance Cost on RLNG Borrowings**
3. **RLNG Revenue Requirement**
4. **Impact of IAS-19**
5. **Late Payment Surcharge in respect of Gas Suppliers**
6. **Transmission & Distribution Cost**
 - 6.1 **Insurance**
 - 6.2 **Legal & Professional Charges**
 - 6.3 **WPPF**



2. Authority's Jurisdiction and Determination Process:

2.1. The petitioners have invoked the jurisdiction of the Authority under Section 13 of the Ordinance and Rule 16 of the NGT Rules. Section 13 provides the grounds on which a review petition can be filed, and is reproduced below:-

"13. Review of Authority decision.- The Authority may review, rescind, change, alter or vary any decision, or may rehear an application before deciding it in the event of a change in circumstances or the discovery of evidence which, in the opinion of the Authority, could not have reasonably been discovered at the time of the decision, or (in the case of a rehearing) at the time of the original hearing if consideration of the change in circumstances or of the new evidence would materially alter the decision."

2.2. It is clear from the above, that the issues brought forwarded/contended by the petitioner in the motion for review must necessarily be evaluated with reference to the provisions of afore-said Section 13 of the Ordinance and meet at least one of the two pre-conditions given therein referring to *change in circumstances* and *new admissible evidence* for admission & decision of the motion. Further, the Authority may refuse leave for review if it considers that the review would not materially alter the decision under review.

3. Proceedings:

- 3.1. The Authority issued notice of pre-admission hearing on December 18, 2017 to the petitioners, accordingly, pre-admission hearing was held on December 21, 2017 at OGRA office, Islamabad.
- 3.2. The petitioner was represented at the hearing by a team of senior executives led by Managing Director, Mr. Amjad Latif. The petitioner was given full opportunity to present their motion for review. The petitioner as well as its legal counsel made submissions with the help of multi-media presentations and contended the merits of the case in detail.
- 3.3. The Authority heard the petitioner's submissions. Accordingly the discussion and decision in respect of issues contended by the petitioner is made in the following manner.



4. Un Accounted for Gas (UFG Benchmark)

- 4.1.1. The petitioner has raised serious reservations regarding UFG study conducted by OGRA as under.
- 4.1.2. Consultation with the licensee, i.e. the Gas Utility Companies, and independent experts was mandatory for setting UFG Benchmark in the tariff determination process undertaken by the Authority. This is due to the clear provisions of Sections 7 & 8 of the Ordinance and the NGT Rules, 2002, read with the licence granted to the petitioner, Condition 21.1 whereof states:
- 4.1.3. The Licensee shall take all possible steps to keep the UFG within acceptable limits. The Authority for this purpose *in consultation with Licensee and experts, shall fix target of UFG for each financial year.* The Authority may fix UFG target separately for each regulated activity.
- 4.1.4. No formal consultative process took place hence the Authority set UFG Benchmarks provisionally for Financial Years 2010-11, 2011-12, 2012-13, 2013-14, 2014-15, 2015-16 and 2016-17.

4.2. UFG Computation Formula

- 4.2.1. The UFG Benchmark Study recommends a formula to determine the acceptable UFG Benchmark for the gas utility companies as follows:

$$\text{UFG Allowance} = \text{Gas Volume Available for Sale} \times [\text{Technical Component} + \text{Local Challenges Component} \times \text{Performance Factor}]$$

4.3. Technical Component

- 4.3.1. Technical Component has been proposed as 5%.

4.4. Local Conditions Factor

- 4.4.1. Additionally, the formula requires additional allowances on account of specific local conditions within which these two Gas Utility Companies operate. This Local Conditions Factor has been capped at 2.6% for the gas utility companies. While the petitioner has serious reservations regarding the capping of this volume.



4.5. Performance Factor

4.5.1. Lastly, the formula has recommended introduction of a Performance Factor by proposing certain KMI's that the gas utility companies should have to achieve if they wish to receive a higher UFG allowance from the Authority. The maximum additional benchmark that the gas utility companies can consequently be given under this Performance Factor is 1%. The petitioner has serious reservations on this issue.

4.6. Inclusion of theft volume (non-consumer volume) as accounted for gas

4.6.1. "Theft by consumers or non consumers once detected can be accounted for and may not be considered as UFG"

4.6.2. Based on the above, statement of the Consultant, OGRA is bound to exclude the 100% non-consumer volumes from the actual UFG determined by it for previous and subsequent years and allow all Non consumer volumes, calculated in accordance with OGRA Procedures, as deemed sales.

4.7. Treatment of UFG Benchmark Report by the Authority

4.7.1. In its determinations on the Estimated Revenue Requirements for the petitioner for Financial Year 2017-18, the Authority has worked out the UFG Benchmark at 6.3%. This figure has been reached by allowing the Technical Component of 5%, and provisionally allowing 50% of the Local Conditions Factor (termed Rate 2), i.e. 1.3%. The Authority has determined that this provisional allowance for the Local Conditions Factor will be actualized in line with the achievement of proposed KMIs at the FRR stage. Without prejudice to the objections raised subsequently on this provisional allowance, it is submitted that adopting the recommendations of the Consultant reflects the Authority's agreement with the fact that a minimum Technical Component of 5% will have to be allowed to the Gas Utility Companies, along with a Local Conditions Factor of (max) 2.6%. Therefore, it is submission of the petitioner that 2.6% technical component has to be allowed by the Authority which (without prejudice) may be revised subsequently.



4.8. Treatment to Past Years

4.8.1. The UFG Benchmark Study also required to finalize the benchmarks set by the Authority for the petitioner for last seven financial years (2010-11, 2011-12, 2012-13, 2013-14, 2014-15, 2015-16 and 2016-17). This is so because the Authority, while setting the applicable UFG Benchmarks for the said years itself stated that those determinations were provisional and were subject to review once a UFG study was received by the Authority. Reference in this regard may be made to the following extracts from the noted determinations of the Authority hereunder for reference:

- i. Decision dated 18.05.2010 on the ERR for FY 2010-11
- ii. Decision dated 02.12.2010 on the ERR for FY 2010-11
- iii. Decision dated 24.05.2011 on the ERR for FY 2011-12
- iv. Decision dated 18.05.2012 on the ERR for FY 2012-13
- v. Decision dated 01.06.2013 on the ERR for FY 2013-14
- vi. Decision dated 05.11.2015 on the FRR for FY 2012-13
- vii. Decision dated 18.12.2015 on the ERR for FY 2015-16
- viii. Decision dated 06.10.2016 on the ERR for FY 2016-17

4.9. Prayer by the Petitioner

4.9.1. It is clear from the various determinations made by the Authority over time to time (referred to above), that the UFG Benchmarks set for the said seven financial years were provisional and subject to review once the UFG Benchmark Study was finalized and approved. The Study, which now stands endorsed through determinations dated 20.09.2017 made by the Authority on the ERR's for the gas utility companies, has recommended two types of allowances for the gas utility companies. It is therefore the submission of SNGPL that the Authority is now mandated by law to now apply the factors which first find mention and endorsement in the UFG Benchmark Study, to the earlier financial years.

4.9.2. Provisional UFG Benchmarks set at 4.5% for FYs 2010-11, 2011-12, 2012-13, 2013-14, 2014-15, 2015-16 and 2016-17 be finalized at 7.6 %, with additional allowances, if any, for any residuals left from the actual volumes calculated by the petitioner on account of theft by non-consumers and law and order losses in accordance with OGRA Procedures.



Decision of the Authority

- 4.9.3. *UFG benchmarks were fixed by the Authority from FY 2005-06 till FY 2011-12. subsequently, the UFG benchmarks were determined by the Authority to be fixed at 4.5 % on yearly basis. The Authority undertook a UFG study for determining UFG Benchmarks of the gas companies through a consultant of international repute vis M/s KPMG Taseer Hadi & Co. Chartered Accountants (KPMG). After a thorough consultative process in stages, at all provincial Federal Capitals M/s KPMG submitted the final draft report on 11-7-2017. The Authority accepted the final UFG Study Report and forwarded it to both gas companies on 30-8-17 for implementation and compliance.*
- 4.9.4. *The Rate 2 is the allowance for local challenging conditions as compared to the world at large particularly with reference to issues in law & order affected areas and uneconomic expansions resulting in theft, leakages, data / meter errors and non-recovery of gas bills. Allowance for these challenging conditions has been worked out at 2.6%. Further in order to ensure that appropriate and serious efforts are directed towards reducing UFG over the agreed term of five (5) years, the allowance with respect to local challenging conditions component (2.6%) is linked to the achievement of certain Key Monitoring Indicators (KMIs) designed to rectify the problem areas contributing towards UFG. The performance of gas companies towards achievement of KMIs is thus a factor to establish the allowance on account of Rate 2. The better the performance the higher the benefit, upto a maximum of 2.6%. Therefore the contention of maximum 1% allowance is either misconceived or points towards lack of efforts planned to be deployed by the company for reducing the overall UFG to retain the advantage of variable allowance.*
- 4.9.5. *The Authority worked out the UFG Benchmark applicable to SNGPL for the said year at 6.3 % including UFG Benchmark of 5% provisionally allowing 50% of the Local Conditions Allowance i.e. 1.3% in the light of the recommendations of the UFG study. The Consultant has also proposed a roadmap with specimen Key Monitoring Indicators (KMIs) and their linkage with the UFG Allowance. KMI has been prepared in consultation with all stakeholders. The twofold mandate of Authority demands it to protect the*



public interest by respecting their rights and secondly requires it to enable a controlled and regulated environment for the utilities to perform in an efficient and prudent manner. Accordingly Rate 2 shall be actualized based on petitioner's actual performance at the time of FRR.

- 4.9.6. *With respect to applicability of UFG benchmark on FY 2010-11 and FY 2011-12 it is again clarified that UFG benchmarks were fixed by the Authority from FY 2005-06 till FY 2011-2012 based on which the FRR's till FY 2011-12 stands settled and finalized. Therefore FY 2010-11 and FY 2011-12 are not relevant for the UFG study; hence the same have not been considered therein nor are the findings of UFG study applicable for these periods. Moreover, FRR's of these two years also do not co-relate to UFG Study. Hence SNGPL contention is totally against the facts.*
- 4.9.7. *From FY 2012-13 onwards, UFG benchmark of 4.5 % was fixed by the Authority plus certain allowances over and above the benchmark were allowed on provisional basis to the Company as per the Policy guidelines of the Federal Government. It is highlighted here that revenue requirements are determined for each financial year after holding thorough consultation sessions through public hearings where every stakeholder, including gas companies, are provided ample opportunity to comment upon all the components forming part of revenue requirement. UFG is one such component which is also open for comments and consultation. Therefore, the contention that no consultation took place while finalizing UFG for FY 2012-13 onwards is baseless.*
- 4.9.8. *The Authority notes that from FY 2012-13 onwards it had provisionally allowed volumes in the light of policy guidelines, to be reconciled with the results of UFG study. It is hence very clear that variation to the extent of provisionally allowed volumes viz: law and order and non-consumer was to be reconciled and no reference with respect to revision UFG Benchmark of 4.5% was ever conceived. It is to be noted that the benchmark has now been implemented on fixed and variable factors wherein the variable factor is based on KMIs, therefore, in accordance with the KPMG's study/ recommendation, it will not be practicable to assess the performance of the sui companies on KMIs with retrospective effect. It has also been observed that the Authority*



has already provisionally allowed a fair and reasonable allowance to cater for the local conditions in the past five years to the tune of 2.494 % on an average over and above the fixed bench mark of 4.5%. Accordingly, the Authority has concluded and finalized the FRR from FY 2012-13 to FY 2016-17. It is observed that there is no new evidence for review, hence, the Authority maintains its earlier stance in the matter.

4.9.9. *As regards the non-consumer's scenario is concerned, the Ministry of Law and Justice through ministry of Energy's letter No. NG(II)-14(52)/11-GA-Vol-I-pt dated 02-01-2018 has clearly opined that the "Gas Theft Control and Recovery Act, 2016" has an overriding effect and section 31 of the Act ibid says that provisions of this Act shall have effect notwithstanding with anything to the contrary contained in any other law for the time being in force. Therefore, as regards responsibility for the recovery of gas stolen, the provisions of the Act shall prevail and the provisions of OGRA Ordinance, 2002 to the extent inconsistency cease to have effect. Further, as per Section 11 of the Gas Theft Control and Recovery Act, 2016 additional amounts on account of the value of gas stolen or pilfered is deemed commensurate with the amount of the monetary benefits accrued to the offender.*

5. Operating Revenues & Expenses

5.1. Late Payment Surcharge Income

5.1.1. The petitioner has submitted that it has offered Rs. 187 million on account of LPS pertaining to RLNG business which was allowed by the Authority in the DFRR but the same was not included in computation of "RLNG cost of Supply/Transportation charges determined vide letter No. OGRA-3(5)/2017 dated 12.10.2017.

5.1.2. The petitioner has further submitted that LPS on take or pay income amounting to Rs. 325 million has been treated as operating income by the Authority while OGRA has already stated vide its letter No. OGRA-8(64)/2006 dated 19.11.2006 that "Take or Pay Income" may not be considered as operating income for the purpose of revenue requirement. Therefore, the petitioner pleaded that any LPS income relating to "Take or Pay" should consequently be treated as non-operating income.

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- 5.1.3. The Authority observes that RLNG pricing is carried out as per Federal Government decision which lists down the pricing components forming the RLNG price. Accordingly, no income such as LPS is included as part of RLNG price. Further, transportation charge is cost of transporting/transmitting the energy molecules; it has no connection with it being an income. *The same is therefore not being considered for inclusion in RLNG cost of supply / transportation charge as offered by the petitioner.*
- 5.1.4. Regarding the income on account of "Take or Pay", amounting to Rs. 325 million, *the Authority admits the petitioner plea and allows the same in the FRR for the said year.*

5.2. Finance Cost of RLNG Borrowings

- 5.2.1. The petitioner has claimed an amount of Rs. 1,267 million on account of Finance Cost in respect of borrowings/loans for creation of RLNG assets. The petitioner has submitted that finance cost in respect of loans obtained for creation of RLNG assets has to be treated as operating cost and consequently should be made part of the RLNG consumer price, in line with ECC policy guidelines
- 5.2.2. The Authority observes that under the existing tariff regime as well as ECC decision, financial/interest cost directly attributable to the creation of new assets is allowed to be included in the cost of the asset till the completion of the same. Further, such assets/projects are entitled for return under the ring-fence mechanism. The petitioners claim for reimbursement of financing cost in addition to the return on the RLNG assets is equivalent to double dipping and thus cannot be allowed.
- 5.2.3. The Authority further observes that the matter contended by the petitioner has already been exhaustively deliberated and decided in the light of relevant ECC decision.
- 5.2.4. *In view of the above, petitioner's plea for allowing finance cost in addition to the return on assets cannot be considered. The Authority, therefore, maintains its earlier decision on the matter.*



5.3. RLNG Revenue Requirement

- 5.3.1. The petitioner has stated that in its petition for FRR for FY 2016-17, the Authority was requested to determine the shortfall in Revenue Requirement of the RLNG business amounting to Rs 2,681 million. However, the Authority has only determined RLNG Cost of supply / Transportation charges and did not discuss the RLNG revenue requirement in totality. The petitioner has further pointed out that it has prepared the RLNG tariff sheet after taking into account the Cost of Service components determined by OGRA vide its decision dated 12.10.2017 which is showing a short fall in RLNG revenue requirement for Rs. 1,547 Million (Rs. 4.47/MMBTU). The petitioner has lately submitted another working claiming a revenue shortfall of Rs. 4,035 million owing to the downward revision of RLNG prices for FY 2016-17 by OGRA. The petitioner agitated decrease in RLNG price will have substantial adverse impact on the revenue requirement of RLNG business for FY 2016-17.
- 5.3.2. The Authority observes that RLNG pricing as per legal framework provided by the Federal Government is carried out under Petroleum Products (Petroleum Levy) Ordinance 1961. Further, as per decision of the FG regarding "RLNG pricing, allocation & allied matters" expenses on this account is a ring-fenced activity, separately maintained and entirely recoverable from RLNG consumers. The detailed working submitted by the petitioner takes into account the adjustments on opening/closing stock of LNG in FSRU, adjustments on account of system gas sold as RLNG & vice versa etc. The Authority observes that the aforementioned items are neither part of the approved RLNG pricing framework nor the cost of supply/service being determined by OGRA.
- 5.3.3. Furthermore, since RLNG is included in Petroleum Products as per SRO No. 405 (I)/2015 and its price is strictly determined in accordance with ECC decision; any shortfall in RLNG activity has no logic to be included in the cost of service/transportation charges. Further, RLNG being a ring-fenced activity, its revenue shortfall cannot be parked in the revenue requirement which may inter-alia impact the natural gas consumers.



5.3.4. *In view of the above, the Authority decides that the request of the petitioner cannot be entertained in the instant motion for review.*

5.4. Impact of IAS-19(Recognition of Actual Losses) FY 2016-17

5.4.1. The petitioner has stated that the Authority has provisionally allowed 50% of the total impact of re-measurement expenses of post retirement funds amounting to Rs. 4,902 million recognized as per Actuarial Valuation and advised to re-visit the assumptions of actuarial valuation viz a viz SSGCL's assumptions in the matter.

5.4.2. The petitioner has explained that the concern of the Authority has been addressed as the Board of Directors (BoD) has accorded approval for the existing indexation formula viz pension indexation linked with the increase of Government of Pakistan without any change for the existing pensioners and for the employees who have or will be retired on or before November 11, 2017. However, for employees retiring after November 11, 2017, indexation will be allowed @ 5% for the year 2017-18 and thereafter, subject to completion of all relevant, codal/procedural and legal pre-requisites.

5.4.3. The petitioner has further submitted that half yearly actuarial valuations in respect of pension and gratuity funds (executives and subordinates) were carried out using revised indexation policy. As a result of change in the company's indexation policy, the actuary has reported a reduction of Rs 2,603 million in Other Comprehensive Income (OCI), consequently the outstanding balance due to SNGPL funds have reduced. Moreover, it is expected that negative charge in OCI will be reported in annual result for FY 2017-18 based on annual actuarial valuations at that time.

5.4.4. *The Authority, in view of above reasons and change in policy as approved by petitioner's BOD, admits the petitioner's claim and allows Rs. 4,902 million under this head for the said year.*



5.5. Late Payment Surcharge in respect of Gas Suppliers

- 5.5.1. The petitioner has stated that the Authority has disallowed the late payment surcharge expense of Rs. 779 million payable to SSGC on the ground that SSGC has not recognized the said income in its books of accounts. The LPS payable to SSGC is as per agreement of Inward Uniform Price Adjustment (IUPA) Agreement. The petitioner has further stated that it has recognized this LPS as per Accounting policies and SSGC also claims it and is in the process to reconcile it with SNGPL. The minor differences in LPS amount (if any) arisen due to reconciliation between the parties will be adjusted in next financial year. The petitioner has requested to allow Rs. 779 million claimed under this head.
- 5.5.2. The Authority observes that as per audited accounts of SSGC, no such income, as contended by the petitioner has been treated as operating income. With the same treatment, the petitioner expense on this account cannot be treated as operating expense.
- 5.5.3. *In view of above, the Authority maintains its earlier decision for the said year.*

5.6. Transmission & Distribution Cost

i. Legal & Professional Charges

- 5.6.1. The petitioner has submitted that litigation against the company has significantly increased due to arbitration matters including international arbitration, LNG contracts, filing of complaints against culprits, FIRS, deteriorating law & order situation, revision in gas tariff, litigation in GIDC and load curtailment policy etc. the petitioner has requested to allow total amount of Rs. 207 million enabling the company to defend its position in court of law.
- 5.6.2. *The Authority notes that the petitioner's contention under this head has already been considered and deliberated in DERR and DFRR for the said year. Moreover, there is no new evidence or plausible justification to review the same. The Authority, therefore maintains its earlier decision.*



ii. **Insurance**

5.6.3. The petitioner has submitted that the Authority pended the amount under sub-head "Loss of Profit" and advised to submit detailed information regarding purpose, methodology of premium computation, benefit received during last ten years. The petitioner has explained that this policy covers Loss of Profit in terms of gas supplied by SNGPL, due to physical loss/damage caused to SNGPL existing gas pipelines (including compressor stations, repeater stations and other installation on the existing pipelines). The petitioner has also provided methodology of insurance premium and requested to allow the same since it has already been paid. The petitioner has further submitted that expense of Rs. 6 million on account of professional indemnity insurance for directors was also pended.

5.6.4. The Authority observes that insurance premium on account of "Loss of Profit" lacks logic and rationale when compared with the amount spent viz a viz benefit derived over the years, which is not convincing. Moreover, ensuring profit to the shareholder at the cost of consumer defies logic.

5.6.5. *In view of above, the Authority disallows the total amount under the subhead "loss of profit" for the year.*

5.6.6. The petitioner has stated that "director's insurance" was obtained in pursuance of decision of BOD to compensate the directors in case to the proviso of Section 180 of the Companies Act, 2017 of Companies Ordinance. The petitioner has also stated the relevant provisions of the Act.

5.6.7. *In view of above, the Authority agrees with the petitioner and allows Rs. 6 million for professional indemnity insurance under the sub-head Miscellaneous, for the said year.*

iii. **Workers Profit Participation Fund**

5.6.8. The petitioner has submitted that the Authority has allowed an amount of Rs. 424 million in respect of WPPF. However, based on the actual profit per the audited financial statements, the WPPF has been worked out at Rs. 660 million.



5.6.9. *The Authority accepts the submission of the petitioner on the basis of its actual profit as per audited financial statements and allows the amount of Rs. 660 million on account of WPPF.*

6. Conclusion/decision

6.1.1. In view of the foregoing, the motion for review for said year is hereby disposed off. The financial impact of adjustments decided above shall form part of upcoming determination(s).

(Dr. Abdullah Malik)
Member (Oil)

(Noorul Haque)
Member (Finance)

(Uzma Adil Khan)
Chairperson

Islamabad, March 12, 2018.



7. List of Abbreviations

BOD	Board Of Directors
DERR	Decision Of Estimated Revenue Requirement
DFRR	Decision Of Final Revenue Requirement
ERR	Estimated Revenue Requirement
FIR	First Information Report
FRR	Final Revenue Requirement
GIDC	Gas Infrastructure Development Cess
IAS-19	International Accounting Standard-19
IUPA	Inward Uniform Price Adjustment
KMI	Key Monitoring Indicators
LNG	Liquefied Natural Gas
NGT Rules	Natural Gas Tariff Rules, 2002
OGRA	Oil & Gas Regulatory Authority
Ordinance	OGRA Ordinance, 2002
RLNG	Re-Gasified Liquefied Natural Gas
SNGPL	Sui Northern Gas Pipelines Limited
SSGC	Sui Southern Gas Company
UFG	Unaccounted For Gas
WPPF	Worker Profit Participation Fund
ECC	Economic Co-ordination Committee
FG	Federal Government

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8. List of Documents Referred in the Order

1. Review Petition of SNGPL against Decision of the Authority DFRR FY 2016-17
2. OGRA Ordinance, 2002
3. Natural Gas Tariff Rules (NGTR) 2002
4. UFG Study Report
5. Decisions of the Authority from FY 2010-11 to FY 2016-17