

Date: 05th July 2021

The Chairman
Airports Economic Regulatory Authority (AERA)
AERA Building, Administrative Complex.
Safdarjung Airport, New Delhi-110003

Subject: Stakeholder Comments to CP 05 / 2021-22 dated 28th May 2021 in the matter of determination of Fuel Infrastructure Charges for M/s Mumbai Aviation Fuel Farm Facility Pvt Ltd (MAFFFL) at CSMI Airport, Mumbai for the 3rd Control Period (FY 2021-22 to FY 2025-26).

Dear Sir,

With reference to the consultation paper 05/2021-22, we would like to submit our comments as below:

1. AERA has proposed 'Price Cap Approach' on 'Single Till' basis for determination of Fuel Infrastructure Charges to MAFFFL, however the FIC charges proposed are much less than the calculations submitted by MAFFFL on 14.01.2021 and thus it is requested that the FIC workings are relooked at so that MAFFFL is able to provide satisfactory level of service and follow the required parameters of Safety and Quality.
2. We have already witnessed the devastating impact of the second wave of Covid-19 and further waves are feared due to the newer and more deadly variants of coronavirus emerging, hence both Domestic and International traffic is not likely to reach Pre-Covid numbers. Further since 2/3rd of ATF volumes at CSMI, Mumbai come from International traffic and the International Traffic particularly is likely to continue to be hit even more harder as such waves come at different times at different countries and flight restrictions are imposed even if one among a pair of countries is affected the

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भारत पेट्रोलियम कॉर्पोरेशन लिमिटेड
(भारत सरकार का उपक्रम)
विमानन व्यवसाय इकाई



BHARAT PETROLEUM CORPORATION LTD.
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Aviation Business Unit

overall ATF volumes will continue to be much lower than projected in the 3rd Control Period.

It is thus requested that the revenues for MAFFFL are reworked keeping the low Traffic and ATF volumes expected during the 3rd Control Period to ensure smooth & efficient operations at all times.

Best Regards

(Pulkit Mathur)

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