

Ref: No. RIL/AERA/2021/01

Date: 25<sup>th</sup> June 2021

To

The Director (P&S, Tariff)  
Airports Economic Regulatory Authority of India (AERA),  
AERA Administrative Complex, Safdarjung Airports,  
New Delhi – 110003, India.  
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Dear Sir/Madam,

Sub: Submission of Stakeholder Comments in the Matter of Determination of Fuel Infrastructure Charges in Respect of Mumbai Aviation Fuel Farm Facility Private Limited (MAFFFL) at CSMI Airport, Mumbai;

Ref: File No. AERA/20010/MYTP/MAFFFL/FF/CP-III/2021-26; AERA Consultation Paper No. 05/2020-21 dated 28<sup>th</sup> May 2021;

With reference to the above subject, we would like to bring to your attention the paragraph No. 1.2 of the Consultation Paper, wherein it has been expressly stated that MAFFFL was incorporated for the purpose of creating an integrated aviation fuel facility on an **“open access”** model.

However, despite innumerable requests over letters and meetings for the last five years the facility has not been opened to all interested suppliers other than IOCL, BPCL and HPCL for supplying ATF to airline customers till date, thereby depriving airline customers of a truly competitive market at CSMI Airport, Mumbai.

As stated under paragraph No. 1.6 of the Consultation Paper, we understand that MAFFFL will finally implement the much-awaited *open access* model by July 2021. We also believe that the onus is on the Authority to ensure implementation of true *open access* model in which all authorized and intending suppliers get an equal footing and an unhindered access to supply ATF to their respective airline customers from the aviation fuel farm facility at the said Airport.

It is submitted that once the coveted *open access* model is implemented at the first place, then only all the intending suppliers / suppliers will become informed stakeholders in the real sense without which they will not be in a position to contribute real value to the tariff determination process.

Any tariff determined overlooking the implementation of *open access* model would only be perceived as an undue reward to vested interest aiding private benefit, to the detriment of true competition at the second biggest airport in the country.

Therefore, it is submitted that in the prevailing circumstances when the *open access* system is yet to be implemented, any exercise of tariff determination by the Authority preceding the implementation of *open access* model is premature and therefore the tariff determination may be deferred till such time the *open access* model is implemented at the said Airport.

Yours truly,  
for Reliance Industries Limited



Amit Aggarwal  
Head – Regulatory Affairs (Energy)