

# IndianOil Skytanking

ISO 9001:2015, ISO 14001:2015 Certified

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

मार्तीय Date 29 June 2021 प्राधिकरण

सफदरजंग एयरपोर्ट, नई दिल्ली - 110003

प्राप्त

डायरी नं० 16116

तारीख 30/6/2021

Subject: Submission of Counter Comments by IndianOil Skytanking Private Limited on the Stakeholder Comments Published through Public Notice Number 06 /2021-22 dated 21<sup>st</sup> June 2021 in response to the tariff determination for the 3<sup>rd</sup> control period for Into Plane Services rendered by IndianOil Skytanking Private Limited at Bangalore International Airport Limited.

Dear Sir,

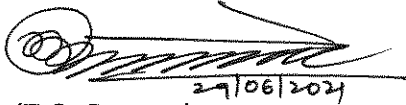
With reference to Public Notice Number 06/2021-22, our responses are stated below.

- 1. Reply to Comments by Hindustan Petroleum Corporation Limited:** We agree with the issue highlighted by HPCL that both service providers should operate on same rates to maintain parity and would request the authority to favourably consider the same.
- 2. Reply to Comments by Bharat Petroleum Corporation Limited:** We strongly believe that pricing parity should <sup>Not</sup> exist for the same service at the same location. Furthermore, the opinion of M/s Link Legal and the Solicitor General of India which was submitted by the company as part of letter to AERA dated 15<sup>th</sup> June 2021 clearly states that AERA guidelines must be followed in letter and spirit by all the Stakeholders including AERA. If the AERA guidelines are followed as it is, then the tariff determination should be done under "Light Touch Approach" as the services are provided by two ISP's and therefore deemed competitive. Further, BPCL has rightly stated that the service levels by IOSL & BSSPL is same considering the Safety and Quality and hence rates of both ISP's need to be at par.
- 3. Reply to Comments by IATA:** IndianOil Skytanking is an integral part of the aviation ecosystem in India and serves domestic, international, and non-scheduled passenger and cargo airlines. The financial difficulties brought upon by COVID-19 are not only limited to airlines as stated by IATA but have impacted Independent Service Providers as well. The tariff submissions made by the company to AERA are in line with the regulatory approach and therefore a tariff hike was necessary as an outcome of the regulatory building blocks approach. A reduction in tariff from the prevailing rates and to continue operating at the same tariff for a duration of 05 years is not sustainable and unjustified. Subsidizing one segment (i.e., Airlines) at the cost of another is not a fair approach and we strongly oppose the same.
- 4. Reply to Comments by Bangalore International Airport Limited:** The fundamentals of conducting the ITP Business at Bangalore International Airport have not changed since the start up of the airport in 2008 as there have been two ISP's providing the service since then. We agree with the comments of BIAL that it is unreasonable to change the regulatory approach to "Price Cap" from "Light Touch" while the competition has not undergone any change.

Submitted for the consideration of the Authority.

Thanking You.

For IndianOil Skytanking Private Limited.

A handwritten signature in black ink, consisting of a circular loop followed by several horizontal strokes, with the date '29/06/2024' written below it.

(T.S. Dupare)

Chief Executive Officer