

The Chairman

Date: 21st May 2021

Airports Economic Regulatory Authority (AERA)

AERA Building, Administrative Complex.

Safdarjung Airport, New Delhi-110003

Subject: Stakeholder Comments to CP 02 / 2020-21 dated 08th April 2021 in the matter of determination of tariff in respect of M/S Bharat Stars Services Private Limited (BSSPL) for providing Into Plane Services at CSMI Airport, Mumbai from 01.04.2021 to 24.01.2025 of the 3rd Control Period.

Dear Sir,

With reference to the consultation paper 02/2020-21, we would like to submit our comments as stated below:

1. The tariff proposed by the authority for BSSPL for the 3rd Control Period of INR 334.40 for FY22 represents a differential of 14% higher than the tariff proposed by AERA for IOSL for the same period.
2. We believe that this differential pricing for the same services at the same airport has an effect of distorting market competition and is not in the best interests of the stakeholders and both the ITP Service Providers.
3. We have already filed a petition on the same subject in the Tribunal vide Appeal Number 03 of 2019 in TDSAT and the matter is sub-judice.
4. Therefore, we urge the authority to determine same tariffs for both ITP service providers at CSMI Airport.
5. The tariff determination should be considered under light touch approach for BSSPL and IOSL as both BSSPL and IOSL have been selected through a competitive bidding process by the Fuel Farm Operator and the condition of having two ITP Service providers at an airport meets AERA's Guidelines of the test of "Competitiveness".

Thanking You,

For IndianOil Skytanking Private Limited



T.S. Dupare

21/05/2021

Chief Executive Officer