



Ref: ACL-4210/2016

October 22, 2019

Commissioner,
Company Law Division and Information System
& Technology Division,
Securities and Exchange Commission of Pakistan,
Islamabad.

**Application for Extension in the Period for
Submission of 1st Quarter Accounts of the Company
under section 237 of the Companies Act , 2017
For the period ended September 30, 2019**

Dear Sir,

Please refer to our letter No.ACL-4210/2004 dated September 30, 2019 and your approval letter No.EMD/233/414/2002-151 dated October 07, 2019 granting us extension in the period of holding AGM and laying therein the annual audited accounts of the Company for the year ended June 30, 2019, for a period of 30 days i.e. upto November 27, 2019, under the provisions of Section 132 and 223 of the Companies Act, 2017.

As informed in the above referred letter, Auditors have given the understanding that audit will be completed and the audited Accounts will be submitted to the Audit Committee and the Board as well within four weeks after the decision of the Oil and Gas Regulatory Authority (OGRA) with respect to the Final Revenue Requirement of the Company, till date the Company's Accounts for the year ended June 30, 2019 cannot be finalized and Audit of Accounts cannot be completed. Accordingly the opening audited balances for preparation of 1st quarter accounts would not be available.

SECP and IAS-34 (Interim Financial Reporting) require that interim reports shall include interim financial statements (condensed or complete) and comparative figures of immediately preceding financial year be mentioned at appropriate place, which in our case are provisional and unaudited till date. Furthermore, if OGRA makes any change in its parameters to determine final tariff for the year 2019, it will have an impact on the quarterly accounts as well. In the absence of FRR for FY 2018-19, the opening balance sheet figures for 1st quarter ended September 30, 2019 would be based on provisional figures which can change materially, once the tariff is finalized by OGRA.

In this regard, it is kindly requested to grant extension under section 237 of the Companies Act, 2017 in circulation of quarterly accounts of the company for the quarter ended September 30, 2019 for a period of one month i.e upto November 30, 2019 please.

It is pertinent to mention here that due to peculiar circumstances, the Company was granted extension on the subject in FY 2003, 2004, 2012, 2013, 2014, 2015, 2016 and 2018 on similar grounds, for circulation of 1st quarter accounts of the respective years.

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SUI NORTHERN GAS PIPELINES LIMITED

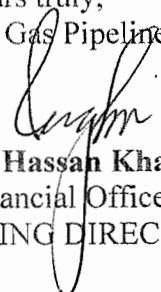
GAS HOUSE, 21 KASHMIR ROAD, P.O. BOX 56, LAHORE (PAKISTAN)

An affidavit duly signed by the undersigned in original and Bank Challan of Rs. 1,000/- in original, paid for filing of this application are enclosed.

We shall be grateful for your kind consideration to our request.

Thanking you.

Yours truly,
Sui Northern Gas Pipelines Ltd


(Saghir ul Hassan Khan)
Chief Financial Officer
for MANAGING DIRECTOR

Enclosures (2):

1. Affidavit of Chief Financial Officer.
2. Bank Challan dated October 22, 2019 of Rs. 1,000/- in original.

cc: Additional Registrar,
SECP, 7 Egerton Road, Lahore

✓cc: The President,
Pakistan Stock Exchange Limited, Karachi

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