



SUI NORTHERN GAS PIPELINES LIMITED

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

Ref: ACL-4210

April 8, 2014

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 Third Quarterly Accounts of the Company
for the Period Ended March 31, 2014**

Dear Sir,

We refer to our letter No.ACL-4210 dated September 30, 2013, October 08, 2013 and February 10, 2014 in response to which you have issued approval letters No.EMD/233/414/02-802 dated October 02, 2013, EMD/233/414/2002-988 dated October 28, 2013 and EMD/233/414/2002-1950 dated February 21, 2014 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, 2013 and submission of 1st and 2nd Quarter Accounts for the period ended September 30, 2013 and December 31, 2013.

As submitted in our aforementioned correspondence, despite continued efforts and follow up with Oil & Gas Regulatory Authority (OGRA), till date the determination of tariff in our case is pending with OGRA, while the Company submitted its tariff case to OGRA on due date i.e. August 15, 2013. Without determination of Final Revenue Requirement (FRR) by OGRA, our Accounts for the year ended June 30, 2013, cannot be finalized and audit of Accounts cannot be completed. Accordingly the opening audited balances for preparation of all the Quarter Accounts for F.Y. 2013-14 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 2013, it will have an impact on the quarterly accounts as well. In absence of FRR for FY 2012-13, the opening balance sheet figures for all the Quarterly Accounts for F.Y. 2013-14 would be based on provisional figures which can change materially, once the tariff is finalized by OGRA.

Apart from above mentioned reasons which makes the Company unable to finalize its accounts, another reason due to which half yearly accounts of the Company cannot be prepared is the fact that the Estimated Revenue Requirements (ERR) for FY 2013-14 which is required to be issued by OGRA which forms the basis of all the Quarterly Accounts for F.Y. 2013-14 has not yet been issued by OGRA.


