Ref: ACL-4210/835 October 28, 2016

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 For the period ended September 30, 2016

Dear Sir,

Please refer to your letter No. EMD/233/414/2002/295 dated October 24, 2016 wherein the Company's request for allowing extension in submission of its 1st Quarterly Accounts for the period ended September 30, 2016 has not been acceded to. In this regard your letter No.EMD/233/414/2002/184 dated September 30, 2016 is being referred wherein extension was granted in the period of holding AGM and laying therein the annual audited accounts of the Company for the year ended June 30, 2016, for a period of 30 days i.e. upto November 30, 2016, under the provisions of Section 158 and 233 of the Companies Ordinance, 1984.

As explained in our earlier letter No. ACL-4210/826 dated October 19, 2016 that despite our best 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, 2016. Kindly note that without determination of Final Revenue Requirement (FRR) by OGRA, the Company's Accounts for the year ended June 30, 2016 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 2016, it will have an impact on the quarterly accounts as well. In the absence of FRR for FY 2015-16, the opening balance sheet figures for 1st quarter ended September 30, 2016 would be based on provisional figures which can change materially, once the tariff is finalized by OGRA. Furthermore, if the Quarterly Accounts are circulated with provisional opening balance, these will indirectly disclose the figures based on which Annual Accounts have been prepared by Management, therefore, we understand that it is not feasible to issue 1st quarter Accounts without our Board's authorization for audited Final Accounts for FY 2015-16.

In this regard, a copy of our letter Ref: RA-TAR-15-16(F)-004 Dated September 20, 2016 is enclosed, addressed to OGRA, wherein OGRA has been requested to advise the Company about the Authority's stance regarding issuance / non-issuance of Final Revenue Requirement (FRR) for FY 2015-16 of our Company on timely basis enabling us to meet the statuary deadlines and OGRA's response Ref: OGRA-6(2)-1(1) /2016-DTRR dated September 27,2016 in this regard is also enclosed. However, non availability of FRR for FY 2015-16 has necessitated this application for extension in circulation of quarterly accounts of the Company for the quarter ended September 30, 2016.

This issue has also been discussed with our external auditors M/s A.F.Ferguson & Company, Chartered Accountants and they are of the view that since the Company has obtained extension in filing of its Annual Accounts for FY 2015-16, in view of non receipt of OGRA determination of final tariff, therefore, SECP may be approached with request to condone non submission of quarterly accounts falling due during the extension period.

In this regard it is pertinent to mention that similar situations had arisen during finalization of 1st Quarter Accounts for previous financial years wherein, SECP while recognizing Company's view Point had provided assurance vide various letters (Copies enclosed) that no penal action would be taken by the Commission as the situation seems to be beyond the control of the Company.

Keeping in view of the above unique circumstances, similar to September 2015 and previous years, the Company seeks an extension for preparation and submission of first quarter accounts for the period ended September 30, 2016, till we are in a position to issue the same and also request that no penal action be initiated against the Company on accounts of non-compliance.

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

Thanking you.

Yours truly,
Sui Northern Gas Pipelines Limited

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

Encl: As above.

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

cc: The President,
Pakistan Stock Exchange Limited, Karachi

SUI NORTHERN GAS PIPELINES LIMITED
GAS HOUSE, 21 KASHMIR ROAD, P.O. BOX 56, LAHORE (PAKISTAN)

Reference:RA-TAR-15-16(F)-004 **Date:** September 20, 2016

Registrar,
Oil and Gas Regulatory Authority,
54, ZTE Plaza, Fazal e Haq Road,
Near PIA Building, Blue Area
Islamabad.

Dear Sir,

Issuance of Final Revenue Requirement (FRR) FY 2015-16

Section 158 of the Companies Ordinance 1984 requires the Company to hold its annual general meeting (AGM) for laying and approval of accounts by the shareholders, within four months from the end of financial year.

Based on the above timeline, the Company was required to file its petition for final revenue requirements for FY 2015-16 by August 15, 2016, so that the Authority after fulfilling all the legal requirements of OGRA ordinance issues its decision on or before September 20, 2016. However, to date no decision has been made by the Authority.

Please note that SNGPL is a public listed Company on the Pakistan Stock Exchange and is required to adhere to stringent timelines under the provisions of the Companies Ordinance 1984. OGRA being a statutory body is not only bound to comply with the requirements of its own statute but also required to facilitate in the compliance of other statutory rules and regulations applicable in the Country.

In view of the above, we would request you to kindly advise us about the decision taken by the Authority regarding issuance of FRR 2015-16, so that we can take up the case with the Security Exchange Commission of Pakistan for necessary extension in declaration / publication of our annual accounts, which under statutory regulations are required to be published by or before October 10, 2016, and to conduct Annual General Meeting by October 31, 2016 accordingly.

An immediate reply in this regard will be highly appreciated.

Yours Sincerely
Sui Northern Gas Pipelines Ltd.

(KAMRAN AKRAM)
General Manager (RA)
for Managing Director

OIL & GAS REGULATORY AUTHORITY

OGRA-6(2)-1(1) /2016-DTRR

September 27, 2016

The Managing Director,
Sui Northern Gas Pipelines Limited,
21-Kashmir Road,
LAHORE.

Subject: <u>REQUEST OF SNGPL FOR ISSUNACE OF FINAL REVENUE REQUIREMENT (FRR) FOR F.Y. 2015-16</u>

Dear Sir,

Reference your letter No.RA-TAR-15-16(F)-004 dated September 20, 2016 on the subject noted above.

2. I am directed to inform that the subject matter is under due consideration of the Authority and will be finalized shortly, therefore, SNGPL may take up the matter for extension in declaration / publication of annual accounts with Security Exchange Commission of Pakistan, accordingly.

Abdul Basit

(Abdul Basit Qureshi)
Registrar
(For & on behalf of the Authority)

54-B, Fazal-e-Haq Road, Blue Area, Islamabad, Pakistan.
Tel: +92-51-9221715-18, Fax: +92-51-9221714
Website: www.ogra.org.pk

SECP

Say No To Corruption

EMD/233/414/2002/287

October 30, 2015

The Chief Financial Officer
Sui Northern Gas Pipelines Limited
Gas House 21-Kashmir Road,
P.O Box 56,
Lahore.

Subject: Application for Extension in Period for Submission of First Quarterly Accounts for the Period Ended September 30, 2015.

Dear Sir,

Please refer to your application dated October 20, 2015 requesting extension in time for submission of first quarterly accounts of Sui Northern Gas Pipelines Limited (the "Company") for the period ended September 30, 2015.

2. In this connection your attention is invited towards the provisions of Section 245 of the Companies Ordinance, 1984 read with Circular No. 9 of 2003, which requires that every listed company shall prepare and transmit its quarterly accounts, whether audited or otherwise, within one month of the close of the first and third quarter, and within two months of the close of the second quarter. It is regretted that the aforesaid provisions do not envisage any extension in time for preparation and circulation of quarterly accounts.

3. However the reasons provided by the Company for expected delay in submission of quarterly accounts appear to be cogent and beyond the control of the Company, therefore, no penal action will be taken by the Commission.

Yours truly,

Haroon Abdullah
Deputy Director (Corporate Supervision Department)

SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN
NIC Building, 63 Jinnah Avenue,
Islamabad, Pakistan

PABX: +92-51-9207091-4, Fax: +92-51-9100454, 9100471, Email: webmaster@secp.gov.pk, Website: www.secp.gov.pk

EMD/233/414/2002/ 629

November 06, 2014

The Chief Financial Officer
Sui Northern Gas Pipelines Limited
Gas House 21-Kashmir Road,
P.O Box 56,
Lahore.

Subject: Application for Extension in Period for Submission of First Quarterly Accounts for the Period Ended September 30, 2014.

Dear Madam,

Please refer to your letters dated October 22, 2014 and October 29, 2014 requesting extension in time for submission of first quarterly accounts of Sui Northern Gas Pipelines Limited (the "Company") for the period ended September 30, 2014.

2. In this connection, I am advised to inform you that the law does not envisage any extension in time for preparation and circulation of quarterly accounts. However the reasons provided by the Company for expected delay in submission of quarterly accounts appear to be cogent and beyond the control of the Company, therefore, no penal action will be taken by the Commission.

Regards,

Haroon Abdullah
Deputy Director (Enforcement)

SECURITIES & EXCHANGE
COMMISSION OF PAKISTAN
NIC Building, 63 Jinnah Avenue,
Islamabad, Pakistan

PABX: +92-51-9207091-4, Fax: +92-51-9218592, 9204915, Email: webmaster@secp.gov.pk, Website: www.secp.gov.pk

SECP

EMD/233/414/2002 _988.

October 28, 2013

Chief Financial Officer
Sui Northern Gas Pipelines Limited
Gas House 21-Kashmir Road,
P.O Box 56
Lahore

Dear Madam,

RE: **Application for extension in time of submission of quarterly accounts for the period ended September 30, 2013 of Sui Northern Gas Pipelines Limited ("Company")**

Please refer to your letter dated October 23, 2013 regarding the captioned subject.

2. In this connection, I am advised to inform you that the law does not envisage any extension in time for preparation and circulation of quarterly accounts. However the reasons provided by the Company for expected delay in submission of quarterly accounts for the period ended September 30, 2013 appear to be cogent and beyond the control of the Company, therefore, no penal action will be taken by the Commission.

Regards,

Rohail

Rohail Ahmed Abbasi
Assistant Director (Enforcement)

SECURITIES & EXCHANGE
COMMISSION OF PAKISTAN
NIC Building, 63 Jinnah Avenue,
Islamabad, Pakistan

PABX: +92-51-9207091-4, Fax: +92-51-9218592, 9204915, Email: webmaster@secp.gov.pk, Website: www.secp.gov.pk