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IN THE HIGH COURT OF DELHI AT NEW DELHI

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ITA 226/2022

PCIT, DELHI-7

.....Appellant

Through: Mr Sunil Aggarwal, SSC, Mr
Shivansh B Pandya, Mr Viplav
Acharya, Ms Priya Sarkar, JSCs and
Mr Utkarsh Tiwari, Advocate.

versus

M/S PETRONET LNG LTD

.....Respondent

Through: Mr Vishal Kalra and Mr Amit Kumar,
Advocates.

CORAM:

HON'BLE MR. JUSTICE VIBHU BAKHRU

HON'BLE MR. JUSTICE TEJAS KARIA

ORDER

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19.03.2025

1. After hearing the learned counsel for the parties, the above captioned appeal is admitted on the following questions of law:-

1 Whether on the facts and circumstances of the case, and in law, the learned ITAT as well as the learned CIT (Appeals) have erred in disallowing the disallowance of Rs.33,31,00,400/- made by the AO, by ignoring the provisions of sub-section (5) of Section 80IA of the Act?

2 Whether on the facts and circumstances of the case, the learned ITAT has erred in deleting disallowances of Rs.1287.32 Lakhs made by the AO u/s. 14A of the Act, read with Rule 8D(ii) of the Income Tax Rules, 1963, without appreciating the fact that Assessee had claimed interest expenses of Rs.17396.02 Lakhs during the year under consideration?



2. The learned counsel for the parties are at liberty to file the documents, which they consider relevant, within the period of two weeks from date, provided that the same were part of the record before the learned Income Tax Appellate Tribunal.

3. List for final hearing on 14.05.2025.

VIBHU BAKHRU, J

TEJAS KARIA, J

MARCH 19, 2025

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Click here to check corrigendum, if any