

# INDUS RIVER SYSTEM AUTHORITY

Government of Pakistan

35-Mauve Area, G-10/4  
Islamabad



Tel: 051-9108008  
Fax: 051-9108007

No. IRSA/CE(O)/232/1215-16  
09<sup>th</sup> March 2018

Immediate / Through Fax

Mr. Iftikhar Ali Khan  
Director  
Registrar Office  
NEPRA, Islamabad.

**SUBJECT: APPLICATION OF CJ HYDRO (PRIVATE) LIMITED FOR GRANT OF GENERATION LICENCE IN RESPECT OF 25 MW AT C-J LINK CANAL, DISTRICT KHUSHAB, PUNJAB**

**Reference:** NEPRA/R/LAG-419/3370-78 dated 05<sup>th</sup> March, 2018, regarding the subject application.

I am directed to state that M/S CJ Hydo (Private) Limited may kindly be directed to formerly apply for No Objection Certificate (NOC) to IRSA along with complete feasibility of the project. As the issue has been deliberated upon at different forums and have serious reservations from some of the concerned quarters, the embargo of submission of comments within 14 days may not be imposed.

This issues with the approval of Chairman IRSA.

NEPRA

Licensing Department  
Diary No. 1195  
Date: 17/3/18

For information  
- AD (L) m/a H  
Ch. W. 13 03 18

- SA (Gen)  
- LA (Gen)  
- DR/DR-I  
- MIF

cc: Chairman for Director (Operation)  
M(L) 17/3/18

Copy for information:  
- PS to Chairman IRSA, Islamabad.

DD-I
DD-II
SH-AD
AD-I
AD-II
AD-III
TA

Registrar
Dy No. 2551
Dated: 18-03-18

NO:DR/10-5/2014/ 494  
 GOVERNMENT OF SINDH  
 IRRIGATION DEPARTMENT  
 Karachi dated the 16 March, 2018

To,  
 The Registrar,  
 National Electric Power Regulatory Authority (NEPRA)  
Islamabad.

Subject: APPLICATION OF CJ HYDROPOWER (PVT.) LIMITED FOR THE GRANT OF GENERATION LICENSE IN RESPECT OF 25 MW AT C-J LINK CANAL DISTRICT KHUSHAB PUNJAB.

Reference: Letter No: NEPRA/R/LAG-419/3370-78, Dated: 05-03-2018.

I am directed to refer NEPRA's letter cited above and to state that Government of Sindh have serious reservations against the grant of generation license of above Hydro Power.

C-J Link not a perennial nor a flood Canal, it is an occasional canal not likely to operate on account of Mangla being a larger reservoir than Tarbela. Construction of controversial power house is a move to convert C - J Link into a perennial canal with the justification of operating it for power plant, which will be very damaging for Sindh Province and deprive the Province of its due share of water and may create devastation in Sindh specially during short supplies. It will badly damage the provincial harmony.

NEPRA had already decided in case of previous application CJ Hydropower (Pvt.) Limited in its meeting held on 28.10.2015 that dispute over water supply does not fall within the mandate of NEPRA and parties must resolve this issue at the appropriate forum as provided in the constitution. This dispute is still being continued between the provinces as such NEPRA is requested to reject the application for grant of generation license.

Further the sanction is against para 14-C of Water Apportionment Accord 1991 as irrigation happens to be priority & diversion of water through C-J Link will generate conveyance losses, which is not desirable.

The detailed comments / contentions of this department on above subject project, are enclosed herewith for your information and further necessary action.

DA/As above.

NEPRA  
 Licensing Department  
 Diary No. 1343  
 Date: 20-03-18

m/4/10

DD-I
DD-II
Sr. AD
AD-I
AD-II
AD-III
TA

*Disc*

For information & approval  
 ✓ — ADG (Gen) 20/03/18  
 — SA (Tech)  
 — SA (I)  
 — DG (MSE)  
 — Consult (TIPI)  
 ✓ — DRD/DY-I) P-1 - m/f  
 cc: chairman  
 VL/m (MSE)  
 m (T) — m (G) — m (CA)

*(Signature)*  
 DIRECTOR REGULATION  
 KARACHI

Registrar
Dy No. 2810
Date: 20-03-18

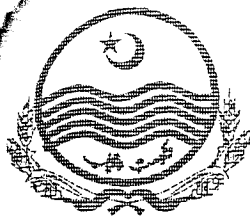
GOVERNMENT OF SINDH  
IRRIGATION DEPARTMENT

Subject: COMMENTS ON CJ HYDRO POWER PLANT

- ▷ Chashma – Jhelum (C – J) Link Canal is not a perennial canal and even not a flood canal. It has no assured supplies throughout the year.
- ▷ It has no allocation under Water Accord 1991.
- ▷ It is operated at present and in the past also against Sindh Province interest and our letters and protests to IRSA are on record.
- ▷ Construction of controversial power house is a move to convert C – J Link into a perennial canal.
- ▷ Conversion of C – J into perennial canal with the justification of operating it for power plant will be very damaging for Sindh Province and deprive the Province of its due share of water and may create devastation in Sindh specially during short supplies.
- ▷ Power house can not be constructed on a canal, which has no assured supplies throughout the year.
- ▷ Allocation of water under clause 14 (a) of the Accord are already decided. No share of C – J is given in the Accord 10 dailies. There is no surplus water for C – J Link Canal.
- ▷ This move of converting C – J to perennial canal will badly damage the provincial harmony and the situation will become very complicated and exploited.
- ▷ C – J can never be converted into perennial canal as it was merely device without fixed allocation to transfer water to Jhelum – Chenab System only when there was shortage and there was surplus in Indus after meeting the requirement of Sindh, Punjab, KPK and Balochistan canal flows and Kotri downstream.
- ▷ Installation of the power house will be damaging for Sindh Province as it will be deprived of its due share of water in the name of power generation.
- ▷ After raising, the Mangla is now the largest reservoir of the country with storage capacity of about 7.406 MAF, whereas Tarbela has storage

capacity of 6.047 MAF. Hence, there is no likely condition to transfer of water from Indus to Jhelum-Chenab System through CJ Link Canal. Consequently, during current Rabi Season 2017-18 CJ Link Canal was completely closed from 7.10.2017 to 22.2.2018.

- ▷ There are many link canals in Punjab Province where the power can be generated but why has this site been selected, which creates inter provincial dispute amongst the provinces and damages provincial harmony.
- ▷ NEPRA had already rejected the previous application of CJ Hydro (Private) Limited on the ground that the parties failed to resolve the dispute over the water flow within the stipulated time vide letter dated 5.4.2016.
- ▷ NEPRA had decided in that case in its meeting held on 28.10.2015 that dispute over water supply does not fall within the mandate of NEPRA and parties must resolve this issue at the appropriate forum as provided in the constitution. This dispute is still continued between the provinces as such NEPRA is requested to reject the application for grant of generation license of the project.



Date: 16 / 03 /2018

The Registrar  
National Electric Power Regulatory Authority (NEPRA)  
NEPRA Tower Ataturk Avenue (East), Sector G-5/1  
Islamabad.

Subject: APPLICATION OF CJ HYDRO (PVT.) LIMITED (CJHPL) FOR GRANT OF GENERATION LICENSE FOR DEVELOPMENT OF 44 MW HYDROPOWER PROJECT AT CHASHIMA JHELUM (CJ) LINK CANAL AT RD. 316+622

This is with reference to letter No.NEPPRA/R/LAG-419/3379-84 dated 05<sup>th</sup> March 2018, inviting comment of relevant stake holders for admission of subject generation license by M/s CJ Hydro.

2. In this regard, it is intimated that different meetings were held for grant of generation license with the capacity of 44.3MW. Consequently NEPRA has directed to revise the FSR with regard to hydrology capacity and financial viability of the project, in light of effect of Mangla raising and subsequently resultant change in flows of CJ Link Canal.

3. The Sponsor of the Project has revised the feasibility with regard to its hydrology, change in capacity from 44.3 to 25 MW and considers it a financially viable project and has applied for issuance of generation license to the Authority.

4. Punjab Power Development Board fully supports the issuance of GL, in view of its issued LOI for clean hydropower energy.

Regards,

Managing Director

CC:

1. PS to Chairman PPDB Board / Additional Chief Secretary, Government of the Punjab, Energy Department, Lahore
2. PS to Secretary, Government of the Punjab, Energy Department, Lahore
3. M/s CJ Hydro (Pvt.) Limited, 15-Peshawar Block, Fortress Stadium, Lahore Cantt.

*[Handwritten signature]*

FOR INFORMATION & USE  
- ADG(Lic)  
- MF  
copy to  
- SAC Tech  
- DR-I  
19/3  
Chairman  
- RL/M (M&E)  
- M&E I - M&E II

NEPRA  
Licensing Department  
Diary No. 325  
Date: 16/03/18

DD-I	
DD-II	
DD-III	
DD-IV	
DD-V	
DD-VI	
DD-VII	
DD-VIII	
DD-IX	
DD-X	
DD-XI	
DD-XII	
TA	

Register  
Dy No. 2973  
Dated: 19-03-18

THROUGH O.C.S:  
MOST IMPORTANT:

No.SOPP:-6/34-2016-NEPRA/P-VII / 836  
GOVERNMENT OF SINDH  
ENERGY DEPARTMENT



Karachi dated 19<sup>th</sup> March, 2018

"SAY NO TO CORRUPTION"

To,

The Director,  
Registrar Office (NEPRA),  
NEPRA Tower, Attaturk Avenue (East), G-5/1,  
Islamabad.

Subject: APPLICATION OF CJ HYDRO (PRIVATE) LIMITED FOR GRANT OF GENERATION LICENCE IN RESPECT OF 25 MW AT C-J LINK CANAL DISTRICT KHUSHAB, PUNJAB.

I am directed to refer National Electric Power Regulatory Authority's letter No.NEPRA/R/LAG-419/3359-69, dated 05-03-2018 on the subject noted above and to state that the application of CJ Hydro (Pvt) Limited (CJHPL) has been examined / reviewed and comments are submitted as under:

"As the Chashma Jhelum Link Canal is not a perennial canal, the plant capacity factor will not be constant, hence instant petition is not supported".

For information & n/a pl.  
— ADG (LIC) / 22/3/18  
C.H. to: — SA (Tech) — SA I  
— LA (LIC) — Gen. Secy (LTP) = Chairman  
C.C to: — DRO / D/S-1] Reg-9 VC/M (MSE)  
— MIF MGT) — M (LIC) — M (CA)

(FAISAL HUSSAIN) 19/3/18  
SECTION OFFICER (POWER)

1. The Director, Power Development Sindh, Energy Deptt: GoS, Karachi w/r to his letter No.DIR/PDS/(Estt:)/2017-18/108, dated 14-03-2018.
2. PS to Secretary, Energy Deptt: GoS, Karachi,

NEPRA  
Licensing Department  
Form No. 1425  
Date: 27.3.18  
G.L.S

DD-1	
AD-1	
AD-2	
AD-3	
AD-4	
AD-5	
TA	

(FAISAL HUSSAIN)  
SECTION OFFICER (POWER)

Registrar  
Dy No. 2949  
Dated 22-03-18



# Pakistan Water & Power Development Authority

Tel: (042) 99202797  
Fax: (042) 99202798  
Email: [cehydroplanning@gmail.com](mailto:cehydroplanning@gmail.com)

Chief Engineer – II (Hydro) Planning  
WAPDA, Sunny View Estate,  
Lahore

No CE-II(H)/P/walks/1025/413

Dated 16-03-2018

→ Iftikhar Ali Khan,  
Director registrar Office,  
NEPRA Tower, Attaturk Avenue (East)  
G-5/1, Islamabad.

Subject: APPLICATION OF CJ HYDRO (PRIVATE) LIMITED FOR GRANT OF GENERATION LICENCE IN RESPECT OF 25 MW AT C-J LINK CANAL, DISTRICT KHUSHAB, PUNJAB

Reference: NEPRA/R/L/LAG-419/3370-98 dated March 05, 2018

Please refer to your letter cited above regarding the issuance of license for the subject hydro power project. WAPDA appreciate the implementation of such projects through private sector and has no objection in granting license to CJHPL to develop 25 MW hydro project at C-J-Link canal Khushab, Punjab.

*For information &*

— ADG (LIC)

*Copy to:*

— SFI-I

*27 03 18*

— Engr. (H) (HD)

*Chairman*

— RA (LIC)

*VC/M (MSE)*

— D. R. / O. J. I. Reg. T.

*MCT*

— M/R

*MCC, - MCC*

*Muhammad Abid Sheikh*  
Chief Engineer – II (Hydro) Planning  
(Muhammad Abid Sheikh)

General Manager (Hydro) Planning, WAPDA, Sunny View Estate, Lahore.

NEPRA

Licensing Department

Diary No. *145*

Date: *27/03/18*

*OK*

*h*

DD-I
DD-II
SD-AD
AD-I
AD-II
A-I
TA

Registrar  
Dy No. *3050*  
Dated: *27-03-18*







No. SO(EVL)IRRI/1-13/2009  
**GOVERNMENT OF THE PUNJAB**  
**IRRIGATION DEPARTMENT**

Dated Lahore the, 04<sup>th</sup> April, 2018

To

✓ **The Director,**  
Registrar Office,  
National Electric Power Regulatory Authority,  
NEPRA Tower, Attaturk Avenue (East) G-5/1,  
Islamabad

For information & mfa H.  
— ADG (Lic) Sub:  
— SAC (L) 10.04.18  
— SA I  
— DG (M&E) cc. Chairman  
— Confid (LHP) VC/M&E  
— PRO/DG-E/MI M(C)

Subject: **APPLICATION OF CJ HYDRO (PRIVATE) LIMITED FOR GRANT OF GENERATION LICENCE IN RESPECT OF 25 MW AT C-J LINK CANAL, DISTRICT KHUSHAB, PUNJAB** m(C)  
m(C)

I am directed to refer to your letter No.NEPA/R/LAG-419/3370-78 dated 05.03.2018 on the subject noted above and to state that as the above project is a canal fall / run of the River Hydro Power Plant hence there is no objection to the construction of this Hydro Power Plant at the tail of CJ Link Canal (**copy enclosed**).

This is for your kind information and further necessary action.

**D.A. As Above**

Asim 7.04.18

**SECTION OFFICER (EVALUATION)**

C.C.

1. Mr. M.H.Siddiqi, Consultant Irrigation Department, Lahore with reference to his U.O.No.IWT&R/18/304/21-CJ dated 12.03.2018.
2. P.A to Additional Secretary (Tech.), Irrigation Department, Lahore.

NEPRA

Licensing Department

Diary No. 6550  
Date: 10/04/18

DD-I
DD-II
SE/AD
AD-I
AD/II
AD/III
TA

2

7 20/4/18

Registrar  
Dy No. 3655  
Dated 10-04-18



GOVERNMENT OF THE PUNJAB  
IRRIGATION DEPARTMENT

196

**SUBJECT: APPLICATION OF CJ HYDRO (PRIVATE) LIMITED FOR GRANT OF GENERATION LICENCE IN RESPECT OF 25 MW AT CJ LINK CANAL DISTRICT KHUSHAB, PUNJAB.**

CP-194/c

Will the Additional Secretary Technical please refer to NEPRA letter No.NEPRA/R/LAG-419/3370-98, Dated.05.03.2018 on the above cited subject.

2. As the above project is a canal fall/run of the river Hydro Power Plant hence there is no objection to the construction of this Hydro Power Plant at the tail of CJ Link canal.

AS (Tech)
AS (Dev)
Dy. No. 1436
Dt. 12/3/18

*M.H. Siddiqi*  
(M.H. SIDDIQI)  
Consultant

pl. put up  
k.  
12/3

**Additional Secretary (Tech),  
Irrigation Department,**

SO (Eval)  
R. put up A 16-3-18

U.O.No.IWT&R/18/ 304 121-CJ Dated 12/3/2018.

Dy. No. 1436
Date 12/3/18
DD (S&E)
SD (Exec)
DD (G)
SO (Eval) ✓
DD (S)

18/4  
16-3-18



Date: 29 / 10 / 2019

✓ **The Registrar**  
National Electric Power Regulatory Authority (NEPRA)  
NEPRA Tower Ataturk Avenue (East), Sector G-5/1  
Islamabad.

**Subject: APPLICATION OF CJ HYDRO (PVT.) LIMITED (CJHPL) FOR GRANT OF GENERATION LICENSE FOR DEVELOPMENT OF 25 MW HYDROPOWER PROJECT AT CHASHMA JHELMUM (CJ) LINK CANAL AT RD. 316+622**

NEPRA during hearing in the matter of review petition filed by CJ Hydropower (Private) Limited (Sponsor), held on November 29, 2016, advised to revise the feasibility study i.e., "Hydrology and Power & Energy Estimation" based on new flow data duly incorporating the change in flow due to Mangla Dam Raising projects. As per direction of NEPRA, the sponsor updated the feasibility study and submitted the revised feasibility study report to NEPRA on August 09, 2017.

2. Authority in its Order in the matter of review petition filed by Sponsor vide letter No. NEPRA/DL/LAG-143/9042-49 dated November 21, 2017 due to significant changes in the main parameters of the project due to submitted revised feasibility report rejected the review petition and advised Sponsor to submit new application for grant of Generation License.

3. The Sponsor submitted a new application for the grant of Generation License to NEPRA on Feb 2, 2018. NEPRA admitted the petition and vide letter No. NEPRA/DL/LAG-419/3379-84 dated March 05, 2018 invite comments from stakeholder. Further, NEPRA forwarded the case to IRSA for issuance of NOC to CJ Hydropower Project (Project).

4. IRSA vide letter No. CE(O)/IRSA/232/6747-50 dated 18<sup>th</sup> October 2019 has issued NOC to the Project Sponsor (**copy enclosed**). The Sponsor vide letter No. CJHP/NEPRA/GL/2019/10-063 dated 21<sup>st</sup> October 2019 to NEPRA has also intimated about fulfillment of the requirements of issuance of NOC for onward development of the Project and has requested for further processing of application for grant of Generation License.

5. As the NEPRA's requirements have been met with, Punjab Power Development Board (PPDB), GoPb fully supports the grant of Generation License in favor of the Sponsor to proceed further with the development of the Project.

Regards,

*Saniya Awais*  
**SANIYA AWAIS**  
Managing Director

For information & file

ADG (Lic)

Caprb:

SA (Tech) - SAT II

TDG (m&E) - LA (G)

DRP / DP - I / HF

30 x 19

E: chowma

VC

m(T)

m(M) - m(G)

RESIPAR

Dy. No: 10887

Dated: 30-10-19

CC:

1. Chairman PPDB Board / Additional Chief Secretary, Government of the Punjab, Energy Department, Lahore
2. Secretary, Government of the Punjab, Energy Department, Lahore
3. M/s CJ Hydro (Pvt.) Limited, 15-Peshawar Block, Fortress Stadium, Lahore Cantt.

7272  
21-10-19



File No: 81  
18/10/19

## INDUS RIVER SYSTEM AUTHORITY

Government of Pakistan

35-Mauve Area, G-10/4  
Islamabad

Tel: 051-9108008  
Fax: 051-9108007

No: CE(O)/IRSA/232/6747-50  
Dated: October 18, 2019

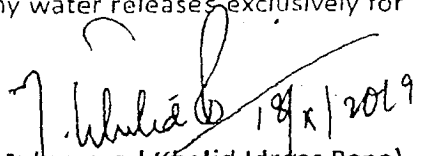
Chief Executive Officer / Director  
CJ Hydro (Private) Limited  
15 Peshawar Block, Fortress Stadium  
Lahore 54810, Pakistan.  
Tel: +92 42 36675595 Fax: +92 42 36664349

Subject: NO OBJECTION CERTIFICATE – CJ HYDRO (PRIVATE) LIMITED

Reference: Your letter No: CJHPL/NEPRA/GL/2019/10-021 dated October 03, 2019

Indus River System Authority (IRSA), after considering all the correspondence regarding the subject matter in its meeting held on 17<sup>th</sup> October 2019, is pleased to issue No Objection Certificate (NOC) to M/S CJ Hydro (Private) Limited for developing a 25 MW Hydropower Project located on Chashma-Jhelum (CJ) Link Canal at TD 316+622 District Khushab by 4:1 majority vote. Member IRSA Sindh dissented on the basis that the CJ Link Canal is an Inter-Provincial Canal and as such it does not come under purview of IRSA.

2. However, IRSA does not commit or guarantee any water releases exclusively for Power Generation in CJ Link Canal.

  
(Muhammad Khalid Idrees Rana)  
Director (Ops) IRSA

Copy for information & further necessary action to:-

- (1) All IRSA Members, Islamabad.
- (2) Registrar, National Electric Power Regulatory Authority (NEPRA), NEPRA Tower Attaturk Avenue (East), G-5/1, Islamabad.
- (3) Managing Director, Punjab Power Development Board, Energy Department, Govt. of the Punjab, 1<sup>st</sup> Floor Central Design Building, Irrigation Secretariat, Old Anarkali, Lahore.

NO:DR/10-5/2018 / 254  
 GOVERNMENT OF SINDH  
 IRRIGATION DEPARTMENT  
 Karachi dated 25<sup>th</sup> October, 2019

To,

**The Registrar**  
 National Electric Power Regulatory  
 Authority (NEPRA)  
Islamabad

*For information & n/a to*  
 ADG (LH)  
 Gmb:  
 — SA (Pch) — SAT-II  
 — DG (m&E) — LA (LH)  
 — DHOI/DG-I/mf  
 OS 1119  
 e-chain  
 VC  
 m(G)  
 m(CA)  
 m(LH)

**Subject: NO OBJECTION CERTIFICATE - CJ HYDRO (PRIVATE) LIMITED.**

**Reference: Letter No: CE(O)/IRSA/232/6747-50, Dated: 18-10-2019 by IRSA.**

I am directed to refer letter cited above addressed to Chief Executive Officer / Director CJ Hydro (Private) Limited and copy endorsed to NEPRA. In this context it is to state that Chashma-Jhelum (C - J) Link Canal is not a perennial canal and nor a flood canal. In fact C-J Canal is an instrument to supplement Jhelum-Chenab system, if it is in shortage provided that Indus system has adequate discharge over and above indent placed by Sindh, and ample storage in Tarbela and Chashma reservoirs. It has no allocation under Water Accord 1991 and it has no assured supplies throughout the year. After raising, the Mangla is now the largest reservoir of the country, whereas due to siltation the storage of Tarbela has reduced drastically. Hence, there is very little likelihood for transfer of water from Indus to Jhelum-Chenab System through CJ Link Canal. Normally, C-J operates only 2 months of flood during July and August.

As C-J Link has no share in Water Accord and Member Sindh has rightly pointed in the meeting that operation of Link Canal does not come in the purview of IRSA without consensus of Government of Sindh. On our protest for operation of Link Canals, IRSA informed the province that it is the prerogative of respective province. It is beyond perception of this department that why IRSA has granted No Objection

RECEIVED  
 25/10/19  
 6-11-19

*Pl. read & [Signature]*

DD			
DV	II	III	
AD	II	III	
TA	L/S	C/A-I	

REGISTRAR  
 Dy. No: 1125  
 Dated: 05-11-19

certificate unilaterally for a canal with condition of no assurance for provision of water which renders the document as void .

The action of IRSA is contradictory to Para 14 (c) of the Water Apportionment Accord 1991 reproduced as under: -

“The existing reservoirs would be operated with priority for the irrigation uses of the provinces”.

Provincial Assembly of Sindh in its session held on Monday the 21<sup>st</sup> October 2019, unanimously passed a resolution in context with the NOC awarded by the Indus River System Authority (IRSA) for the controversial Hydropower Plan on the Chashma Jhelam Link Canal. Copy of the same is enclosed for information. The honorable Chief Minister Sindh has taken serious note of the NOC as well.

It is requested that reservations of the Province and concerns of Sindh Assembly may be considered, while proceeding with the case. Further the representative of Sindh Irrigation Department may be invited to present the case in the hearing of award of license to the above subject project.



DIRECTOR REGULATION  
KARACHI

Copy forwarded for information to: -

1. Secretary Energy Department, Government of Punjab, Lahore.
2. PS to Secretary, Irrigation Department, Government of Sindh, Karachi.