



NATIONAL TRANSMISSION & DESPATCH COMPANY (PVT) LIMITED

General Manager (Technical), NTDC

No. GMT/NTDC/125/1833-38

For information & signature of Mr. I.A.K. Dated: 06-11-2020



Mr. Iftikhar Ali Khan
Director, Registrar office NEPRA
NEPRA Tower, Attaturk Avenue (East)
G-5/1, Islamabad.

- ANG (lic)
- MF
- SA (tech)
- DR-I
- BLA (lic)

Signature
19/11/20
cc: Chairman
-rcimc
-mca1-m (AKK)
-mkg

Sub: APPLICATION FOR TRANSMISSION LICENCE FOR PROVINCIAL GRID COMPANY - KHYBER PAKHTUNKHWA TRANSMISSION & GRID SYSTEM COMPANY (PVT) LIMITED

Ref: NEPRA's letter No. NEPRA/R/LAT-07(PGC)/37749-56 dated 22-10-2020.

Reference is made to NEPRA's letter referred above whereby NTDC, amongst other stakeholders, has been invited to express and tender its reservations/comments/objections on the Application of Khyber Pakhtunkhwa Transmission & Grid System Company (Pvt) Limited for grant of transmission license for provincial grid company for province of Khyber Pakhtunkhwa pursuant to Section 18(A) of NEPRA Amendment Act 2018. Please find the preliminary comments/objections on subject application as follows:

1. Under Article 154(1) of the Constitution, the Council of Common Interests ("CCI") shall formulate and regulate policies in relation to matters in Part II of the Federal Legislative List of the Constitution. In light thereof, if a matter falls within the powers of CCI under Article 154, it must be placed before it. The subject of 'Electricity' is listed as Entry No. 4 in Part II of the Federal Legislative List of the Constitution and therefore, the policy decisions in respect of the Electricity must be placed before the CCI. This constitutional dictate has been recognized and envisaged by the legislature in the NEPRA Act, Section 14A whereof provides *inter alia* as follows:

"14A- (1) The Federal Government shall, from time to time, with the approval of the Council of Common Interests, prepare and prescribe a national electricity policy for development of the power markets:

...
(2) The policies referred to in sub-section (1) shall provide for, inter alia-

...
(c) integration of national and provincial transmission systems;

..."

In light of the foregoing, it is submitted that the grant of license to a Provincial Grid Company (PGC) under Section 18A of the NEPRA Act would inevitably lead to interconnection at provincial and federal levels and has to be centrally and carefully

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Dy. No. 16558
Dated: 09/11/20

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planned. The actions taken by one grid company should not overlap with the actions of any other operator, thus requiring planning and policy formulation. Similarly, either one or both operators may attribute the responsibility of partial or full grid system collapses to each other. In light thereof, the preparation and prescription of policy framework in respect of *inter alia*, the integration of national and provincial transmission systems under Section 14A of the NEPRA Act is a sine qua non for the operations of, and/or grant of license to any provincial grid company. Unless such policy framework becomes effective, no license could have been granted to any provincial grid company under Section 18A of the NEPRA Act. The same is also evident from a perusal of Section 18A of the NEPRA Act which provides *inter alia* that the licensee to act as a provincial grid company may be granted '*subject to the provisions of this Act*'. Consequently, the Determination is contrary to the provisions of the NEPRA Act, the Constitution, and also hampers the smooth functioning of the transmission sector.

2. Section 18A of the NEPRA Act provides for *inter alia* the grant of license to a provincial grid company. Section 18A (2) of the NEPRA Act deals with the mode and mechanism of such grant and provides as follows:

"(2) The eligibility criteria for grant of license as a provincial grid company shall be prescribed and shall include, without limitation,--

(a) minimum solvency requirements; and

(b) minimum technical and human resource requirements."

From a perusal of Section 18A(2) of the NEPRA Act, it is evident that the same provides that the eligibility criteria for grant of license as a provincial grid company shall be prescribed, including the minimum solvency and minimum technical and human resource requirements. Further, the term 'prescribed' has been defined by Section 2(xxii) of the NEPRA Act and requires such criteria to be prescribed by rules, to be made by the Federal Government. The term 'shall be prescribed' indicates that the prescribing of rules in terms of Section 18(A) of the NEPRA Act is mandatory and a sine qua non for entertaining and adjudicating upon any application for grant of license as a provincial grid company. The significance of a uniform, well thought-out criteria and yardstick for assessing the application and exercising discretion in this regard is also highlighted from the proviso to Section 18A(1) of the NEPRA Act, which provides that only one such license shall be granted for each Province at any one time.

3. Khyber Pakhtunkhwa Transmission & Grid System Company (KPT&GSC) doesn't have the requisite experience pertaining to planning, construction and operation of the EHV grid & transmission. The CVs of only two personal CVs are attached in the documents from page no.186 to 198 who have no relevant experience of EHV transmission system and for operation & control in a grid company as mentioned in the NEPRA Act 1997 Chapter III, clauses 18A (2)(b) & 18B "Minimum Technical & Human Resources & Responsibilities of provincial grid company respectively and therefore is not entitled to act as a provincial grid company.



and 2015 Policy endorse this fact. For instance, according to the 2015 Policy, for any project that is connected to the national grid "Consent from the Power Purchaser (NTDC/CPPA or DISCO) shall be obtained by Provincial Authority or Project Sponsor." It could be concluded that the function of power procurement by the federal entities is regulated by, inter alia, standards, prescriptions and requirements of the applicable legal and regulatory framework. Power procurement by the federal entities therefore, may additionally only be undertaken upon satisfaction of such other applicable requirements.

9. Without prejudice to the foregoing, it may not be out of place to mention here that NTDC has already been awarded the service territory of whole Pakistan except Karachi (K-Electric area) pursuant to the exclusive Transmission License granted by NEPRA to NTDC, issued on 31 December 2002 for a period of 30 years and therefore the same is valid upto 30 December 2032. Further, 500/220 kV network in whole Pakistan along with Generation & Transmission System (except Karachi) is a mandate of NTDC as per NEPRA Act 1997, therefore sharing of this mandate with KPT&GSC, may result in a major conflict among NTDC & KPT&GSC regarding their role & responsibilities.
10. The KPT&GSC plans to install power plants and evacuate their power of the order of 7300 MW in the above said regions in the next 5 – 10 years. Keeping in view that the company is yet to be issued the license (if applicable) and is yet to start its commercial operation with no previous hands on experience or expertise and the terrain in the Khyber Pakhtunkhwa province, the said timeline seems very unrealistic. The National Grid Planning is within the competency of NTDC and as a central planner, NTDC in coordination with DISCOs is responsible for carrying out in short, medium and long terms planning including transmission expansion planning. NTDC has already planned its system for the said future timeline and is also carrying out projects for the power evacuation from a number of power plants located all over the country to fulfill the national power demand for the upcoming years. The Company has identified Six Corridors for their planned generating units i.e. Chitral, Dir, Manshera, Kohistan, DI Khan and Swat regions. All of the said regions are located in Mountainous areas where very limited corridors might be available for erection of extra high voltage transmission lines. If the said scarce corridors are availed by some new company having no prior planning, operation or maintenance experience(s) then it is very much possible that the transmission line erected by the company might not ensure the most efficient use of available resources and transmission line corridors. Further, this might also limit the options of power evacuation in the said regions.
11. Page 231 (Section IV, Point 1): The license document has not mentioned transmission projects which are currently in the implementation stage as well as also already planned that would serve as feeding sources for the KPK, i.e., 220 kV grid stations of Swabi, Haripur, Kohat & Jamrud and 500/220 kV grid station at Nowshera (Aza Khel) etc.
Page 231 (Section IV, Point 1.5, 2nd Paragraph): It has been mentioned that NTDC has contributed to 1019MW load shedding in PESCO due to its network constraints. This is not true; in fact, the load shedding is because of existing transmission network constraints



submitted that no similar rules have been framed for the transmission segment, which acts as a backbone of the power sector.

7. The Application under reply is liable to be rejected solely on the ground that the same fails to meet the basic eligibility criteria that is required under the law. Regulation 3 (h) of National Electric Power Regulatory Authority Licensing (Application and Modification Procedure) Regulations, 1999 ("the Regulations") provides as under:

"(h) in case of a license for a new facility or system, a feasibility report in respect of the project, specifying in detail:

- (i) The type, technology, model, technical details and design of the facilities proposed to be constructed, developed or installed;*
- (ii) The expected life of the facility or the system;*
- (iii) The location of the facility or the system, or the territory with outer boundaries within which the facilities or the system is proposed to be installed and operated by the licensee, along with maps and plans and*
- (iv) The type and details of the services proposed to be provided."*

The Application under consideration does not provide the mandatory feasibility report specifying the details as required under the above mentioned Regulation.

Also, the Application of KPT&GSC fails to comply with the criteria provided under Regulation 3(g) (b) of the Regulations which requires the transmission license applicant to provide the type, technology, model, technical details and design of the facilities proposed to be acquired, constructed, developed or installed, a territorial map of the service area proposed to be covered and particulars in respect of the availability, sources, rates and evidence of commitments from the sources of electric power. No such information and specifications have been provided by the Applicant.

8. It is apprised that by virtue of Article 142(a) of the Constitution and in context of the Eighteenth Amendment, the Parliament and Federal Government are exclusively empowered to (respectively) legislate and exercise executive authority over matters relating to 'Electricity'. Whereas, Article 157 of the Constitution makes specific provision with respect to 'Electricity'. According to the Article 157 of the Constitution which makes specific provision with respect to the authority and discretion of a Provincial Government that "a Government of a Province may construct power houses and grid stations and lay transmission lines for use within the Province ". This infers that the construction of power infrastructure and facilities lies within the discretion of the Province until it is not connected to the national grid.

It seems obvious that the electricity through the Provincial Grid Company would be injected in to the national grid. This calls for an interaction of the Provincial Government with the federal entities. According to the Federal Legislative List, Electricity is listed as Entry No. 4 in Part II of the Federal Legislative List and falls within the constitutional domain of the CCI. Subject to the Constitution and the law, decisions of the CCI may inform the interaction between the Federal and Provincial Governments with respect to matters relating to Electricity. CCI's decisions of 2011 and 2016, ECC Decision of 2015



in the absence of a backdrop, it is submitted that till date, no rules have been framed to prescribe the eligibility criteria, the minimum solvency requirements and the minimum technical human resource requirements. It is humbly submitted that in absence thereof, the discretion of NEPRA to grant such licenses remains unstructured, which is contrary to the law. Moreover, it is pointed out that Section 18A of the NEPRA Act is not a self-executory provision as it requires further legislation/steps to become effective and operative. Unless the rules are framed, the rights, duties or powers given under Section 18A of the NEPRA Act could not be exercised. Consequently, NEPRA could not adjudicate upon or assess any application under Section 18A of the NEPRA Act, until the requirements of Section 18A(2) are followed and rules, as required, were prescribed as it is a settled principle of law that if something is required to be done in a manner, it shall be done in that manner alone or not at all.

5. Without prejudice to the foregoing, it is further submitted that transmission license to a provincial grid company cannot be granted due to the following reasons:
 - (i) National Electric Power Regulatory Authority (Application, & Modification Procedure) Regulations, 1999 (“**Licensing Regulations**”) deal with *inter alia* the procedure for application for licenses. Regulation 3(3) of the Licensing Regulations provides that the registrar shall not receive the application unless it is accompanied with the correct amount of application fee. Regulation 3(2) deals with the correct amount of the application fee for various categories of licenses and provides that such fee is prescribed under Schedule II of the Licensing Regulations. It is pointed out that till date, no fee has been fixed or provided for an application for a provincial grid company. In absence thereof, the entertaining of application by the Authority is in non-compliance with Regulation 3(3) of the Licensing Regulations.
 - (ii) Similarly, Regulation 3(6) of the Licensing Regulations read with Schedule III provide for a non-exhaustive list of the documents which shall be provided in support of an application. Till date, Schedule III has not been amended to provide for any list of documents for license of the provincial grid company.
 - (iii) In the generation and distribution segment, National Electric Power Regulatory Authority Licensing (Generation) Rules, 2000 and National Electric Power Regulatory Authority Licensing (Distribution) Rules, 1999 have been framed respectively to provide for *inter alia* the terms and conditions of a license and rights and obligations of such licensees. It is submitted that no similar rules have been framed for the transmission segment, which acts as a backbone of the power sector. In light thereof, the application for license for a provincial grid company could not have been entertained unless the requisite legislative framework is put into place by the appropriate bodies/authorities.
6. In the generation and distribution segment, National Electric Power Regulatory Authority Licensing (Generation) Rules, 2000 and National Electric Power Regulatory Authority Licensing (Distribution) Rules, 1999 have been framed respectively to provide for *inter alia* the terms and conditions of a license and rights and obligations of such licensees. It is



of PESCO and non-completion of already planned investment. It has also been observed that allocated power quantum quota by NPCC to PESCO network is not being fully utilized owing to higher losses on the 11 kV feeders resulting in High Voltages on Transmission System which may possibly hamper the operations during such High Voltage Conditions. Therefore, bringing in proposed KPK Grid Company would have negative impact on their financials as well.

Page 234 (Section 5, Point 3): KPT&GSC has mentioned some transmission milestones, i.e., 500 kV transmission line from Chitral to Chakdara. In this regard, it is intimated that the technical feasibility of that particular line for evacuation of HPPs in Chitral and Dir regions up to Chakdara along has not been carried out yet. The voltage levels and number of transmission lines shall be decided after completion of the feasibility study. In fact, PEDO has launched the feasibility project to be conducted through private consulting company for the last one year and bids are under evaluation at present.

12. The Applicant is targeting the power generation in the North in the regions of Chitral, Dir, Mansehra, Kohistan and Swat. As per Grid Code (Planning Code PC4), NTDC is mandated to prepare Indicative Generation Capacity Expansion Plan (IGCEP) considering the demand and supply position of the country. Therefore, the decision regarding induction of hydro power project in future, its quantum and timings should be strictly in line with the IGCEP.

Page 230 (Section III, Point 2): The IGCEP (2020-47) doesn't neglect the power generation in KP in which the future generation plants are selected by software (PLEXOS) on the basis of least cost principles after evaluating all the available candidate generation options.

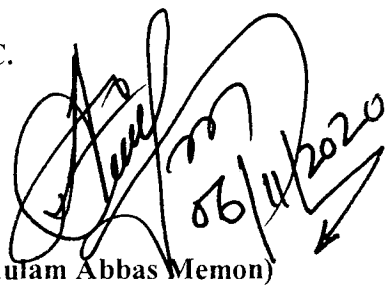
13. It is further highlighted that, as the Generators constructed pursuant to IGCEP are subjected to central dispatch by NPCC as per the Section 14B of the Act and the Grid Code, the operation of the line and the dispatch of the generators would be carried out by the System Operator. Therefore, the provincial grid company would have no control over the dispatch of such generators within its territory. Moreover, it is pointed out that as per amendment 18A of the NEPRA Act, KPT&GSC can operate only as Transmission Company where as the dispatch function which includes stable and economic transfer of power from generator to consumer in view of reliability and economy which is a specific function of dispatch center has not been mentioned in the amendment. Hence KPT&GSC cannot be granted to operate as transmission and dispatch company.
14. Page# 7 (Section B): The document mentions that KPT&GSC intends to propose transmission projects for the provision of electricity to the Special Economic Zones (SEZs). In this regard, it is intimated that NTDC is already implementing transmission projects for the provision of electricity for Rashakai and Hattar SEZs.
15. Currently, all the power plants to be connected to National Grid either at 132 kV voltage level or at EHV 220 kV & 500 kV voltage levels, are required to submit their protection system studies and proposed relay settings to NTDC for review and approval as an essential technical requirement. Hence, NTDC has devised a centralized system from where the protection system coordination and the necessary relay settings are issued, which ensure



in coordination with the concerned Discos and avoids travelling of faults of one voltage level to the higher voltages levels endangering system stability and reliability. Inclusion of the Company, will cause inefficiencies in this work and may cause improper coordination of protection system which will not only be a source of damage to the expensive power system equipment and cause loss of supply to the end consumers but will also cause major blackouts and brownouts not only in the Company's network but also in National Grid throughout Pakistan resulting in revenue loss. Furthermore, it is evident from the fact the NTDC (P&C) department is currently involved in Relay Settings and selection of relays for 11 kV feeders after fatal accidents in some Discos upon direction from the Ministry of Energy.

The Respondent (NTDC) intends to urge and submit further grounds at or before the hearing of this Application and reserves its right to such extent. The Respondent also seeks an opportunity of hearing in the subject matter which may graciously be granted by the Authority in the interest of justice. In view of the above preliminary submissions, the Respondent (NTDC) does not support the application of KPT&GSC for issuance/grant of provincial transmission license. Therefore, it is humbly prayed that the Application under reply may kindly be rejected.

This is issued with the approval of Managing Director NTDC.



(Engr. Ghulam Abbas Memon)
General Manager (Technical) NTDC

CC:

1. Managing Director (NTDC), WAPDA House Lahore.
2. DMD (P&E)/(AD&M) NTDC, WAPDA House Lahore.
3. Mr. Syed Mateen Ahmed, Section Officer (Tariff), MoE (PD) GoP, in compliance to letter No. F-NO. NTDC/2015 dated 04-11-2020.
4. Master File

Central Power Purchasing Agency Guarantee Limited

A Company of Government of Pakistan



For information & use of
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CPPA-G/2020/ CEO/SMD/683-688

November 05, 2020

The Registrar NEPRA,
NEPRA Tower,
Ataturk Avenue, G-5/1,
Islamabad

copy to
- ALA Secy
- RRT

cc: chagron
- VC MÜ/m (LC)
- MCAI - m (MRE)

Subject: Comments on Application of Khyber Pakhtunkhwa Transmission and Grid Company (Private) Limited for Grant of Transmission License for Provincial Grid Company (PGC) for Khyber Pakhtunkhwa Province

Reference: NEPRA Letter No. NEPRA/R/LAT-07(PGC)/37749-56, dated Oct 22nd, 2020

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This is with reference to NEPRA's letter referred above, the comments of CPPA-G are hereby submitted in summarized as well as in detailed form for the due consideration of the Authority.

Summary of the Comments:

At the outset, CPPA-G comments on subject application include inter-alia: (a) Section 23G of NEPRA Act allows only one System Operator in the country at one time (b) Generation facilities connected directly or indirectly to the National Grid Company (NGC) or PGC are subject to the economic dispatch under discretion of the System Operator (c) NEPRA Act mandates System Operator for performing the function of System Planning including both transmission and generation capacity plans and (d) Grant of the license in absence of prescribed Eligibility Criteria for PGC may result in legal complications

Detailed Comments:

The detailed comments on the application are mentioned hereunder for the consideration of the Authority.

- 1. Function of System Operator:** The Applicant / Petitioner in its application has defined its principle business which includes system operations and scheduling and dispatch of the generation plants. This is in contradiction to the provisions of the NEPRA Act. The NEPRA Act Amended 2018 introduces the System Operator as an entity to perform the function of System Operations and obtaining a separate System Operator License is mandatory for this purpose. In addition to this, Section 23G of NEPRA Act categorically states that "only one such licence shall be granted at any one time". However, till the grant of such license, National Grid Company shall perform the function of System Operator as given in Section 18: Responsibilities of National Grid Company, subsection 1, Clause (e).
- 2. Operation of the Line and Dispatch of Generators:** In additional to the Point (1) above, it is further highlighted that generation facility connected directly or indirectly to the NGC or PGC shall be subject to the economic dispatch as directed by the System Operator. Therefore, the provincial grid company will have no control over the dispatch of such generators within its territory. The reference of the provisions of the NEPRA Act has been given hereunder:

Section 14D Duties of Generating Companies:

"(2) In the case of a generation facility connecting directly or indirectly to the transmission facilities of the national grid company or a provincial grid company, the generation company shall make the generation facility available for the safe, reliable, non-discriminatory, economic dispatch and operation of the national transmission grid and connected facilities,

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subject to the compensation fixed by the Authority for voltage support and uneconomic dispatch directed by the system operator."

3. **Alignment with Indicative Generation Capacity Expansion Plan:** The application by the Applicant / Petitioner has proposed power evacuation of approximately 7,320 MW to be available in the next 5-10 years by various hydro power projects. As per Grid Code (Planning Code PC4), NTDC is mandated to prepare (IGCEP) considering the demand and supply situation of the country. Hence, prior to any commitment with the new projects, endorsement of site, size and technology and timing should be aligned with IGCEP prepared by NTDC and Renewable Energy Policy under discussion with Ministry of Energy (Power Division).

The IGCEP has been submitted to NEPRA by NTDC. Therefore, any decision regarding induction of hydro power projects in the system, its quantum and timing should be strictly in line with the IGCEP. It is further suggested that subsequent studies should be done to evaluate which zones are most feasible to bring the hydro power at the minimum levelized cost and maximum firm capacity contribution to the grid.

4. **Alignment with Transmission System Plan:** The National Grid Company have the exclusive right of providing transmission services in the whole country as mentioned in the NEPRA Act. The reference of the provision of the NEPRA Act has been given hereunder:

Section 17 National Grid Company, sub-section 2 says:

"(2) The licensee referred to in sub-section (1) shall have the exclusive right to provide transmission service in the service territory specified in such license"

The function of centralized planning for the transmission network in the country is under the competency of NTDC as mentioned in the Grid Code PC4 (Transmission System Expansion Plan). Therefore, the transmission business of PGC is limited to the development, construction and maintenance of transmission facilities approved under TSEP, located in its territory. However, during the preparation of TSEP, NTDC shall consult the PGC for its inputs and suggestions but NTDC is responsible for preparing IGCEP and TSEP. DISCOs shall prepare their Sub-Transmission Development Plans (STDP) and PGC shall be bound to adhere to these plans.

Therefore, the transmission business for PGC should not include transmission planning. There should be only one entity on country level for central planning of the Primary Transmission Network which in our case is NTDC as of today. At the same time, DISCOs are responsible for the planning of their Secondary Transmission Network. Role of PGC and like entities should only be limited to the implementation of the approved plans.

Additionally, in the future, function of System Planning for long term capacity has been given to the System Operator Licensee as per the provisions of Section 23G of the NEPRA Act. Moreover, till the grant of such license, NGC is the deemed System Operator.

5. **Eligibility Criteria for Provincial Grid Company Not Prescribed:** The legal implications of granting a license in the absence of the prescribed eligibility criteria rules should be considered. Under section 18A of the Act, the Federal Government will provide eligibility criteria for granting license to provincial grid company. Such Criteria has yet to be prescribed, in the absence of which, granting such license may have legal implications. Therefore, it is recommended that such license may not be granted



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to any Applicant / Petitioner until the prescribed Eligibility Criteria rules are in place.

6. **Application Err the Relevant Clause of Eligibility Criteria:** The Applicant / Petitioner has erroneously stated eligibility criteria for setting up of provincial Gird company to be under Section 18B of NEPRA Act. However, the eligibility criteria for the PGC is given in Section 18A of the NEPRA Act.

Omer Haroon Malik
Head of SMD, CPPA

C.C.

- MD NTDC, WAPDA House Lahore
- Joint Secretary Power / Finance, MoE (Power Division), Islamabad
- Chief Engineer PSP, NTDC, WAPDA House Lahore
- CEO CPPA, Islamabad
- SO Technical, CPPA, Islamabad
- Master File



Date: 10/11/2020

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

Attn: Director (Registrar Office, NEPRA)

Subject: COMMENTS ON APPLICATION REGARDING TRANSMISSION LICENSE FOR PROVINCIAL GRID COMPANY - KHYBER PAKHTUNKHWA TRANSMISSION & GRID SYSTEM COMPANY (PRIVATE LIMITED) (KPT&GSC)

Reference is made to your letter No. NEPRA/RLAT-07(FGC)/37741-48 dated 22.10.2020 forwarded by Section Officer (T&P), Energy Department, Punjab vide letter No. SO(POWER) ED/21-46/2020-1109 dated 29.10.2020.

The application of KPT&GSC is principally supported for issuance of Provincial Grid Company License in accordance with section 18-A of amended NEPRA Act 2018 with the provisions that;

- (i) The minimum technical and human resource capital will be employed as and when required.
- (ii) KPT&GSC will provide open access as per NEPRA Act.
- (iii) It shall participate in the Wholesale Electricity Market (WEM).

It is submitted for kind consideration of the Authority.

Regards,

Managing Director
 Punjab Power Development Board

CC:

1. PS to Secretary, Government of the Punjab, Energy Department, Lahore
2. SO (T&P), Government of the Punjab, Energy Department, with reference to the above mentioned letter.

For info (S.M.A., P.E. 13/11/2020) cc: Chairman
 : VC/MCT
 : M(Lic)
 : MCR&E.
 - A.D.C. (Lic)
 Copy to: DRO-I / DRC-I.

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Dy. No: 1176
 Dated: 13-11-2020