

**Issues of Public Hearing in the matter of
NEPRA (Electric Power Procurement) Regulations, 2022**

1. Whether there is a need to address the credit worthiness and liquidity issues of Ex-WAPDA DISCOs/ Suppliers of Last Resort (SOLR) and making them financially and technically viable entities before obligating them to enter into bilateral contracts for procurement of electric power?
2. Whether each SOLR should be allowed to prepare and submit its own power acquisition programme (PAP) separately or would it be more prudent if PAP is jointly prepared by all involved SOLR and IAA based on the capacity obligation calculated by Market Operator and capacity mix approved in IGCEP for subsequent submission to the Authority for approval?
3. Whether it should be mandatory for all SOLRs (public as well as private) to avail the auction administration services of IAA or the role of IAA be limited only to public sector SOLRs? Besides, will it be prudent to allow IAA to provide voluntary services to competitive suppliers on mutually agreed terms and conditions?
4. Whether it would be prudent to allow the representation of the concerned SOLRs in the auction and evaluation committee constituted by the IAA for procurement of electric power?
5. Whether competitive auction for SOLRs be exclusively allowed to be organized and carried out by IAA, or will it be prudent to allow also respective SOLR to carry out their auctions at own?
6. Whether KE should also be required to get competitive auctions conducted for their procurement of electric power through IAA or KE may be allowed to carry out competitive auctions on its own or any other entity?
7. Whether the procurement of electric power by SOLR from import of power should be subject to the optimisation of IGCEP except that fall under the criteria of strategic projects or otherwise?
8. Whether the procurement of electric power from generation licensee/companies (IPPs, GENCOs, SPPs, NPPs etc.) after expiry of their term of the PPAs should be subject to the optimisation of IGCEP and the procurement process provided in these regulations for sale of electric power to SOLRs?
9. Whether the procurement of electric power from generation licensee/companies (IPPs, GENCOs, SPPs, NPPs etc.) after expiry of their term of the PPAs should be allowed for sale of electric power as merchant plants (*"take and pay"*) under CTBCM at marginal price?
10. Whether Public Procurement Regulatory Authority (PPRA) Rules shall be applicable on procurement of electric power by public sector SOLRs ?
11. Whether templates of power acquisition programmes and procurement plan should be made part of these regulations or otherwise?
12. Whether a one step process may be introduced under which the IAA may submit the auction plan and bidding documents including the RFP together under a single application for

the approval of the Authority or the existing process as provided within the draft regulations may be followed?

13. Whether the period of fourteen (14) days-time is sufficient for evaluation of bids and submission of evaluation report by the IAA to the Authority?

14. Whether these regulations should specify the auction stages and procedure to be followed or the same should be left open to be proposed by the IAA in each case for approval of the Authority?

15. Whether these regulations should be applicable on procurement of electric power from embedded generation companies i.e. generation facilities connected directly (at 11 KV) with the distribution system of the relevant DISCO or otherwise?

16. Whether the negotiation should be allowed after receipt of bids?

17. Any other issue as may be raised with permission of the Authority.
