

To,

The Registrar NEPRA,
NEPRA Tower, G-5/1 (East), Islamabad.

**SUB: COMMENTS AGAINST THE GRANT OF DISTRIBUTION LICENSE TO BAHRIA TOWN PVT LTD
LAHORE**

Please refer to advertisement if Daily dawn Dated 24th May 2023, (PID I 7169/22) -Notice for comments in the matter of application of Bahria Town (Private) Limited for Grant of Distribution License.

Being resident of Bahria Town Lahore and as a tax paying citizen / member of general public, I hereby submit the following comments against the grant of license to BTPL:

1. Currently, Bahria town Lahore is providing electrical connections to residents upon payment of excessive fee and billing the consumers by itself. As such, excessive billing is common and no method of bill correction is present. The complainants are not allowed to see decision making officers and only instalments option is provided to them as a relief.
2. Complaint resolution mechanism is ineffective. A clerk level staff is posted for receiving complaints with virtually no power / authority to address the same. Access to decision making officers is limited. Complaint tracking is ineffective and the system only benefits insiders and bahria town staff.
3. The terms and conditions mentioned in the electricity bills are very excessive and one sided. They provide no provisions for protection of consumer. They just focus upon extortionate penalties.
4. Distribution boxes are placed next to gates of some houses instead of their precise location in front of boundary walls between two houses so as to take equal space between the houses fronts.
5. Bribe of bahria town staff and demand for speed money is common practice for getting connection and for relocating distribution boxes. Otherwise 3-4 months' time is given to resolve such issues.
6. Disconnection and re-connection policy is very excessive and against principles of justice.
7. Unjustified / unexplained charges, miscellaneous charges etc are put in bills every month. No complain is heard against them and mistreatment of elderly / ladies in the offices is normal practice in Bahria Town Lahore offices.
8. The electricity tariffs charged are very high as compared to tariffs notified by NEPRA.
9. Un-announced Load shedding and breakdowns occur as in other areas.
10. Electricity fluctuation / fluctuation of voltage is common. Due to this electrical appliances regularly get damaged.

Aforementioned in view, it is submitted that Bahria Town Private Limited does not have the capacity nor the honesty to deliver electricity distribution services to the residents. Hence the distribution system of Bahria Town Lahore should handed over to LESCO, and LESCO should directly bill the consumers as per policy of NEPRA.

Abdul Rahim Niazi

Current address: H.No.17, st:5,
Sector G, Bahria Enclave, Islamabad
0346-3811877

REGISTRAR OFFICE
Diary No. 7034
Date: 24/5/23

Forwarded please:
☒ For rec action ☒ for information

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For kind information please

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|-------------|-------------------|
| 1. Chairman | 2. M (Tech.) |
| 3. M (Lic.) | 4. M (Trf. & Fin) |
| 5. M (Law) | |

PRIME MINISTER'S OFFICE

BOARD OF INVESTMENT

Kohsar Block (6TH Floor), Pak. Secretariat
Islamabad

- Subject : 1) APPLICATION FILED BY M/S. SHAMS POWER LIMITED FOR GRANT OF POWER SUPPLY LICENCE
- 2) APPLICATION OF M/S. NIZAM POWER (PVT.) LIMITED FOR MODIFICATION IN ITS GENERATION LICENCE
- 3) APPLICATION FILED BY BAHRIA TOWN (PVT.) LIMITED FOR GRANT OF DISTRIBUTION LICENCE AT LAHORE

Kindly refer to NEPRA's letters No. NEPRA/R/LAS-19/13145-51 dated May 25, 2023, No. NEPRA/R/LAG-453/12962-69 dated 24th May, 2023 and No. NEPRA/R/LAD-53/12990-96 dated May 24, 2023 on the subjects cited above.

2. Since, the matters pertain to purely technical for examination and issuance of power generation, transmission/supply licenses etc., NEPRA may proceed as per Policy / rules in vogue, please

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| DD-I | AD-I | DD-II | DD-III |
| AD-II | AD-III | AD-IV | AD-V |
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(Qazi Asif Mahboob)
Desk Officer (Policy)

National Electric Power Regulatory Authority (NEPRA) (Mr. Iftikhar Ali Khan, Additional Director General), NEPRA Tower, Ataturk Avenue (East), G-5/1, Islamabad
BOI's U.O. No. 1(2)/NEPRA/2022-PP-II Dated : June 2, 2023

REGISTRAR OFFICE
Diary No: 7308
Date: 05-06-23

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| 7. Dir. (Tech.) | 8. Consultant |
| 9. LA | 10. Dir. (IT) |

For kind information please
1. Chairman
2. M (Lic.)
3. M (Law)
4. M (Tech.)
5. M (Trf. & Fin.)



GUJRANWALA ELECTRIC POWER COMPANY LIMITED

Ph.#055-9200498
Fax:055-9200122
dgmirad@gepco.com.pk

OFFICE OF CHIEF EXECUTIVE OFFICER, GEPCO LTD.
(Market Implementation Regulatory Affairs Department)
WAPDA Rest House Peoples Colony Gujranwala.

No. 1499-1502/DM(CM)

Dated 31/05/2023.

✓ Mr. Iftikhar Ali Khan
Additional Director General,
National Electric Power Regulatory Authority,
NEPRA Tower, Attaturk Avenue (East),
G-5/1, Islamabad.

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| 7. Dir. (Tech.) | 8. Consultant |
| 9. LA | 10. Dir. (IT) |
| Kind information please | |
| 1. Chairman | 2. M (Tech.) |
| 3. M (Lic.) | 4. M (Trf. & Fin) |

Subject: COMMENTS ON THE APPLICATION FILED BY BAHRIA TOWN (PRIVATE) LIMITED FOR GRANT OF DISTRIBUTION LICENCE AT LAHORE.

Reference: Notice for Comments Regarding the Application of Bahria Town (Private) Limited for the Grant of Distribution Licence Notified on the NEPRA Website.

While considering and before deciding on the license application of Bahria Town (Private) Limited (BTPL) under review, we expect that the honorable Authority shall duly consider the following comments of GEPCO submitted with a view to assist the honorable Authority in arriving at a well-informed decision in the matter.

1. BPTL is purchasing electricity at one point under the C-3 tariff from LESCO and then reselling it to its consumers. GEPCO would, however leave it up to the honorable Authority to review the legality of a C-3 consumer reselling electricity to others in various categories (e.g., Residential A-1, Commercial A-2 and Service G) vis-à-vis the clear definition of tariff category 'C'.
2. The applicant has failed to submit the most recent annual return of the company. Instead, they have provided an annual return that includes the statement of financial position as of June 30, 2020. Further no separate data specific to the "Distribution of Electric Power" is available.
3. The BPTL has not provided its understanding of operational boundaries with other system stakeholder, i.e. the nearby DISCOS, SO, TNO, MSP etc.
4. The applicant BPTL has not submitted any plans for aligning with CTBCM. It is worth noting that there are no indications of intention to enroll with MO, either as a Service Provider or as a Market Participant. These circumstances raise following points that necessitate the focused attention of the honorable Authority to arrange appropriate responses by involving all stakeholders.

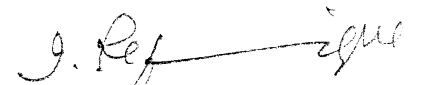
REGISTRAR OFFICE

Diary No: 7402

Date: 06/6/23

- a. That whether such Distribution Licensee shall also be "Supplier of Last Resort" to the extent of relevant Service Territory or NOT?
- b. That whether the XW-DISCO shall yet remain Supplier of Last Resort (or Supplier of Supplier of Last Resort) for the consumers of such Distribution Licensee or NOT?
- c. That whether such Distribution Licensee be responsible for submission of DIIP and/or PAP as applicable, for the relevant service territory (as required under the Act and Regulations) or NOT?
- d. That whether such Distribution Licensee (and Supplier of Last Resort to retail regulated Customers) be required to submit tariff petition for the relevant Service Territory and, therefore, charge the tariff as determined by the Authority and notified by the Government or NOT? and that what shall be the modus operandi to deal with inherent subsidies and cross subsidies thereof?
- e. That whether, in line with essence of the CTBCM, other competitive suppliers be allowed to operate in the relevant Service Territory or NOT?
- f. What shall be the methodology for recovery of Distribution Use of System Charges in case the Supplier (of last resort or the competitive supplier) are different than the Distribution Company. Shall the same be through invoice of Supplier (SOLR / Competitive) or directly by the Distribution Company over and above the invoices of Supplier(s).
- g. What will be the proposed method for billing and recovery?
- h. Furthermore, which entity will assume responsibility for the reconnection and disconnection of consumers?

While GEPCO acknowledges that the CTBCM, as approved by the Honorable Authority, has already embodied the required balance by mandating open and non-discriminatory access rights and establishing independent controlling organizations, such as MO, SO, SPT and MSP, creating the island of Distribution within the Service Territory of a DISCO would give rise to consumer issues in that region due to ambiguity of roles and responsibility.


(IRFAN RAFIQUE)
 Director General (MIRAD)
 GEPCO H/Q Gujranwala

Copy to: -

- 1) PSO to CEO, GEPCO for information, please.
- 2) General Manager (Technical) GEPCO, Gujranwala.
- 3) DG MIRAD LESCO for information, please.
- 4) Master File



BTPL
(LHR)
File

Dis

Engr. Mazhar Iqbal Ranjha,
Registrar,
National Electric Power Regulatory Authority (NEPRA),
NEPRA Tower, Attaturk Avenue,
G-5/1, Islamabad.

Ref No. KE/RA&GR/NEPRA/2023/407
June 23, 2023

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Regd
Secy

SUBJECT: COMMENTS ON APPLICATION FILED BY BAHRIA TOWN (PRIVATE) LIMITED FOR GRANT OF DISTRIBUTION LICENSE FOR MOHLANWAL AND ORCHARD HOUSING SCHEMES

Dear Sir,

This is with reference to notice for comments published on NEPRA website regarding the application filed by Bahria Town (Private) Limited ('Applicant') for grant of Distribution License for its electricity distribution facilities at Mohlanwal and Orchard Housing Schemes ('Application').

In this regard, KE would like to place on record its comments in the subject matter, as similar applications may be filed by other entities within KE's service territory.

a) Separate Licenses for Distribution and Electric Power Supply

As per Section 20 and Section 23E of the NEPRA Act, 1997 (as amended) ('Act'), Distribution and Supply of Electric Power are two separate licensed activities. Accordingly, to maintain compliance with the envisaged open market structure and the regulatory framework, it is humbly requested that separate license applications are filed by the Applicant, which are consistent with the business activities.

b) Supplier-to-Supplier Sale of Electric Power

Emphasis is humbly drawn to regulation 9 (9) of the NEPRA Licensing (Electric Power Supplier) Regulations 2022, which disallows sale transactions between electric power suppliers. Relevant excerpt reproduced below for ease of reference:

An electric power supplier shall not sell electric power to any other electric power supplier except as may be required for settlement of imbalances in accordance with the Commercial Code.

Accordingly, it is humbly requested that all such applications seeking such arrangements, which involve sale/purchase of electric power transactions between different electric power suppliers are holistically evaluated in line with the applicable regulatory provisions to ensure consistency and compliance.

Forwarded please:

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| 7. Dir. (Tech.) | 8. Consultant |
| 9. LA - KLP | 10. Dir. (IT) |

For kind information please

1. Chairman
2. M (Lic.)
3. M (Law)

4. M (Tech.)
5. M (Trf. & Fin.)

REGISTRAR OFFICE

Diary No.

Date

2400
3-7-23
8622
27/6/23



c) BPCs as consumers eligible to opt for supplier of their choice under the existing notified regulatory framework.

As per the NEPRA Act, consumer is defined as '*person or his successor-in-interest who purchases or receives electric power for consumption and not for delivery or re-sale to others, including a person who owns or occupies a premises where electric power is supplied;*'.

Under the existing Notified Regulatory Framework, Bulk Power Consumers (BPC) are eligible to opt for supplier of their choice. In this regard, it is humbly submitted that as per the NEPRA Act a BPC is defined as '*a consumer who purchases or receives electric power, at one premises, in an amount of one megawatt or more or in such other amount and voltage level and with such other characteristics as the Authority may specify and the Authority may specify different amounts and voltage levels and with such other characteristics for different areas.*'

Accordingly, it is humbly requested that a holistic evaluation is made in respect of all applications pertaining to one point supply in alignment with the applicable regulatory framework and the approved CTBCM design.

d) Procurement of Power from Competitive Supplier and Supplier of Last Resort (SoLR) Simultaneously

KE understands that the existing Notified Regulatory Framework does not allow the arrangements where a BPC can procure electric power from SoLR and from a Competitive Supplier at the same time i.e., once an eligible consumer opts for open market, such a consumer remains no longer part of the regulated market and this arrangement is prohibited under Regulation 4(f) and 6 of the NEPRA Consumer Eligibility Criteria (Electric Power Suppliers) Regulations, 2022.

Moreover, as per the current Notified Regulatory Framework, a consumer of a Competitive Supplier shall only be eligible to get supply from SoLR either when the Competitive Supplier has defaulted in its obligation to supply power and a notice of termination of the arrangement between the eligible consumer and Competitive Supplier has been served by such eligible consumer, or the eligible consumer has terminated the arrangement with the Competitive Supplier in accordance with the bilateral supply agreement between the Competitive Supplier and such eligible consumer.

Therefore, it is humbly requested that supply from SoLR cannot be procured if a BPC opts for a Competitive Supplier under the existing Notified Regulatory Framework.

e) Stranded Cost and Cross-Subsidy Surcharge

Under the existing Notified Regulatory Framework, only Bulk Power Consumers (BPCs) i.e., consumers with load 1MW or above are eligible to enter into a bilateral contract with a Competitive Supplier. As per the Indicative Generation Capacity Expansion Plan (IGCEP) approved by NEPRA in February 2023, it is envisaged that the generation capacity surplus based on peak demand, which is around 12,000 MW (as of 2022), will increase to around 25,000 MW by 2031. Accordingly, once an eligible consumer opts to shift from the regulated market to the non-regulated market, this would result in stranded costs. Therefore, allowing eligible consumers / BPCs to procure power through bilateral contracts or directly from the market without any recovery of costs arising due to advent of open access / stranded costs,



would exacerbate the issue of idle capacity and further increase the cost for regulated consumers, as long-term capacity commitments have already been made/planned.

Moreover, it is pertinent to highlight that under the GoP's existing policy for consumer-end tariff, high-end consumers including BPCs cross-subsidize low-end consumers. By allowing BPCs (*currently eligible consumers to enter into bilateral contract with supplier of their choice*) to procure power directly from the market, BPCs will be able to avoid cross-subsidy payments. Here, it is also important to note that the cross subsidy is a social obligation imposed on DISCOs and KE as per GoP policy and has no nexus with the efficiency or performance of DISCOs or KE.

In this regard, attention is drawn to Para 5.6.7 of the National Electricity Policy 2021 and Principle (vi) of the CCoE approved principles for Competitive Markets, which state that the Regulator will provide for recovery of costs arising due to advent of the competition, as decided by the Government. (*Relevant extracts reproduced below for ease of reference*)

National Electricity Policy (5.6.7)

The Regulator will provide for recovery of costs arising on account of distributed generation and open access in the consumer-end tariff, as decided by the Government. Further, the Government may announce, from time to time, various concessional packages to incentivize additional consumption to minimize such costs.

CCoE Approved Principles for establishing Competitive Wholesale Market (vi)

The Regulator should account for stranded fixed costs that arise due to advent of the competition. The Federal Government should decide whether such costs will be paid through Government subsidy or otherwise charged to consumers through regulatory process (Accounting for fixed costs that become stranded)

In view of the above, KE humbly requests the Honorable NEPRA Authority that to avoid any additional cost to regulated consumers, a mechanism is devised and finalized in consultation with all stakeholders to ensure recovery of costs associated with opening up of the market including stranded costs and lost cross subsidy surcharge, which would be critical to send the correct signal to the market as well facilitating a sustainable transition towards open markets.

f) CTBCM Model as a single framework for Open Market / Bilateral Transactions

It is humbly submitted that the CTBCM Model should be the single framework for all bilateral / open market transactions. KE understands that as per the approved CTBCM design, competition is to be introduced at the supply end, and network of existing network licensees shall be utilized to wheel the power. Accordingly, laying of new / additional network by another network operator in jurisdictions where a network already exists will not be prudent.

Therefore, KE humbly requests that while competition / choice of supplier is for supply business, for the purpose of open market / bilateral transactions, network of the existing network licensee for the particular service area should be utilized for wheeling of power in accordance with NEPRA Open Access Regulations, 2022.



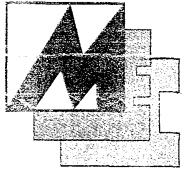
The CTBCM model is a major change to Pakistan's power sector landscape, aimed at bringing efficiency in the power sector and structural changes directed towards development of an efficient liquid power market. KE appreciates market reforms for an efficient competitive power market and is confident that appropriate regulatory and policy decisions for implementation as envisaged under the National Electricity Policy 2021 would help shape a resilient Pakistan power market for the future.

KE humbly requests the Honorable Authority for consideration of the above comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Muhammad Imran Qureshi'.

Muhammad Imran Qureshi
Chief Regulatory Affairs &
Government Relations Officer



M. E. CONSULT (PVT) LTD.

MANAGEMENT AND ENGINEERING CONSULTANTS

Ref. No. MEC/418/2023/084

The Registrar NEPRA
NEPRA Tower, G-5/1 (East)
Islamabad

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| 5. DG (Trf.) | 6. Dir. (Fin.) |
| 7. Dir. (Tech.) | 8. Consultant |
| 9. LA | 10. Dir. (IT) |

For kind information please

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|-------------|-------------------|
| 1. Chairman | 2. M (Tech.) |
| 3. M (Lic.) | 4. M (Trf. & Fin) |
| 5. M (Law) | |

Dated – 31-05-2023

Di (K07)

Subject: **NOTICE FOR COMMENTS IN THE MATTER OF APPLICATION OF
BAHRIA TOWN (PRIVATE) LIMITED LAHORE FOR GRANT OF
DISTRIBUTION LICENCE**

Registration no. LAD-53

Reference: Daily Dawn dated 24-05-2023

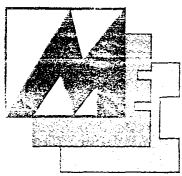
Dear Sir

We M/s. M.E. Consult (Private) Ltd., Lahore (approved consultant on Distribution networks) welcome the commencement of proceeds for grant of Distribution Licence to Bahria Lahore although their request remained delayed / pending for a very long time.

We being associated with Bahria Town Lahore in planning and design of distribution networks for more than 20 years period have precisely been over viewing all the activities related to its construction, maintenance and operations by Bahria, in the designated areas.

Our comments are given as following.

1. The electricity distribution design of the project meets all international standards and its construction is second to none compared with any large housing project elsewhere in Pakistan.
2. Bahria management have been trying timely upgradations in accordance with load growth by augmenting the capacity of 132kV grid stations and installation of new 132 kV grid stations
3. Bahria Town have qualified and experienced technical staff for installation, maintenance and operation of their complete distribution networks with adequate inventories procured through PEPCO/NTDC approved vendors.



M. E. CONSULT (PVT) LTD.

MANAGEMENT AND ENGINEERING CONSULTANTS

4. For construction of all grid stations even in their addition / augmentation, NTDC approved EPC contractors were engaged after obtaining approvals of LESCO for design and equipment to keep it compatible with LESCO NTDC transmission networks.
5. Since the past denial to Bahria in obtaining distribution licence, Bahria Town management always suffered in the hands of LESCO who raised all sorts of objections on pretext of pendency in distribution licence while processing the cases like extension of load applications and subsequently addition of power transformer cases. All the approvals at the end were possible after issuance of directions from NEPRA, thus caused disputes/delays.
6. Since last few years there have been complaints by residents for over charging in their monthly billing since the unilateral abrupt increase in tariff C3 made difficult for management to sell the residents at Nepra tariffs.

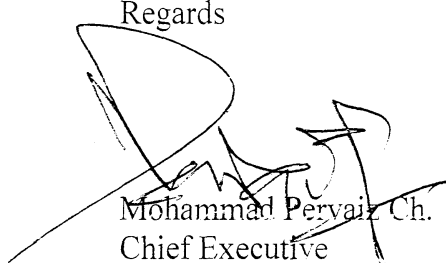
As per our assessment, Bahria Town Lahore is fully capable for grant of distribution licence from Nepra to distribute electricity in the asked areas meeting all criteria set by Nepra.

Early proceeds on the subject and issuance of distribution licence to Bahria with adequate tariff determination shall allow Bahria to serve the residents most satisfactorily. This shall also facilitate them to obtain the timely approvals from LESCO (as LESCO'S obligations under Nepra act), till the time LESCO is supplying power to Bahria Town Lahore.

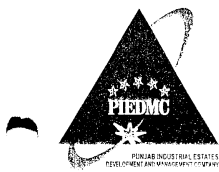
We appreciate the policy and ambition of Nepra to supply and sale of electricity as commodity to develop a healthy competition among DISCOS for better services and a competitive priced electricity to the consumers.

We request Nepra to also make the other provisions like supply of power arrangements, wheeling arrangements etc to be most practical for the benefit of market players, licencees and the general public appearing as undergoing efforts from Nepra.

Regards


Mohammad Pervais Ch.
Chief Executive

Page 2 of 2



PUNJAB INDUSTRIAL ESTATES

DEVELOPMENT AND MANAGEMENT COMPANY

A Company setup under Section 42 of the Companies Ordinance, 1984 (now Companies Act, 2017)



Ref No. PIE/GMT/NEPRA-1400

Dated: June 22, 2023

To,

The Additional Director General,
Office of the Registrar,
National Electric Power Regulatory Authority,
NEPRA Tower, Ataturk Avenue (East)
Sector G-5/1, Islamabad.

SUBJECT: COMMENTS ON APPLICATION OF BAHRIA TOWN (PRIVATE) LIMITED (BTPL) FOR GRANT OF DISTRIBUTION LICENSE AT LAHORE

Reference: NEPRA letter# NEPRA/R/LAD-53/13030-32 Dated: 24-05-2023

Dear Sir,

PIEDMC supports and recommends the grant of distribution license to Bahria Town (Pvt.) Limited Lahore if the applicant fulfills the conditions.


22.6.2023.
General Manager Technical

Copy to:

1. Chief Executive Officer, PIEDMC
2. Chief Engineer Electrical, PIEDMC.
3. M/s ASC Advisory



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| 7. Dir. (Tech.) | 8. Consultant |
| 9. LA | 10. Dir. (IT) |

For kind information please
1. Chairman
2. M (Tech.)
3. M (Lic.)
4. M (Trf. & Fin.)
5. M (Law)



Head Office: Commercial Area (North) Sundar Industrial Estate, Sundar Raiwind Road, Lahore.

Tel: 042-35297203-6, Fax: 042-35297207, UAN: +92-42-111-743-743

Website: www.pie.com.pk E-Mail: info@pie.com.pk

An Approved Non Profit Organisation U/S 2(36) of Income Tax Ordinance 2001





No.PPDB/ 248 /2023
PUNJAB POWER DEVELOPMENT BOARD
ENERGY DEPARTMENT

1st Floor, Irrigation Secretariat,
Old Anarkali, Lahore
(Ph: 99213885 Fax: 99213875)

Date 19/06 /2023

✓ Addl. Director General
Registrar Office

National Electric Power Regulatory Authority (NEPRA)
NEPRA Tower, Attaturk Avenue (East), G-5/1
Islamabad

Subject: - **APPLICATION FILED BY BAHRIA TOWN (PRIVATE) FOR GRANT OF DISTRIBUTION LICENCE AT LAHORE**

This has reference to Energy Department letter No. SO (P) ED /21-46/2020(Part-III)/761 dated June 01, 2023 enclosing copy of letter No. NEPRA/R/LAD-53/12997-03 dated May 24, 2023 for seeking Energy / PPDB views and comments on the application filed by Bahria Town (private) Limited (BTPL) for grant of Distribution Licence at Lahore.

2. The application filed by BTPL is reviewed and it is observed that the BTPL is already permitted for distribution of 40 MW at Mohlanwal & 19.6 MW load (s) at Bahria Orchard through 132 KV / 11 KV Grid Station maintained by them. They have already requested, LESCO, the concerned DISCO to extend the load to 70 MW, the same is under process of approval.

3. The grant of distribution license is made in foreseeing the expansion in existing Bahria Blocks e.g. A, B, C, D, E, F, Safarai and new Bahria Orchard schemes, the additional load requirement is 212 MW and planned distribution transformers load is to be extended to 249.4 MVA on ring main with open loop system.

It is also indicated by BTPL that they take one point supply from LESCO and distribute to 12,126 consumers through competitive tariffs i.e. Residential-A1, Commercial-A2 and services (G). It is apprised that BTPL maintained robust underground power distribution system. Further it is also reported that they have installed generators having capacity 1250 KVA for uninterrupted supply of power and to improve the quality of life of their residential consumers.

4. In consideration of above, PPDB / Energy Department supports further processing of the application under prevailing NEPRA laws, Punjab Environmental Quality Standards (PEQS), Electricity Act, 1910 & Electricity Rules, 1937.

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| 3. DG (M&E) | 4. DG (CAD) |
| 5. DG (Trf.) | 6. Dir. (Fin.) |
| 7. Dir. (Tech.) | 8. Consultant |
| 9. LA | 10. Dir. (IT) |

Best Regd.

Director Technical Coordination

Punjab Power Development Board (PPDB)

CC:

For kind information please
1. Chairman
2. M (Tech.)
3. M (Lic.)
4. M (Trf. & Fin.)
5. M (Law)

1. Section Officer (T&P), Government of the Punjab, Energy Department
2. PS. to Secretary (Energy), 8th Floor, EFU Building, Jail Road, Lahore
3. PS to MD, PPDB, 1st Floor Irrigation Secretariat, Old Anarkali, Lahore
4. PA to AS (Companies), Government of the Punjab, Energy Department

REGISTRAR OFFICE
Diary No. 216/23
Date: 21/6/23



SUI NORTHERN GAS PIPELINES LIMITED

GAS HOUSE, 21 KASHMIR ROAD, P.O. BOX 56, LAHORE (PAKISTAN)

Ref: BDC: (IND-LHR): 129

Dated: May 31, 2023

National Electric Power Regulatory Authority,
NEPRA Tower, Attaturk Avenue (East),
G-5/1, Islamabad.

Attn: Iftikhar Ali Khan
Additional Director General

**APPLICATION FILED BY BAHRIA TOWN (PRIVATE) LIMITED FOR GRANT OF
DISTRIBUTION LICENSE AT LAHORE**

Dear Sir,

Reference your letter No. NEPRA/R/LAD-53/12997-03 dated 24.05.2023, regarding the subject cited above.

In this context, we wish to inform that SNGPL has not provided a Captive Power gas connection (i.e. for power generation) to Bahria Town (Private) Limited (BTPL), located at Lahore. We understand that the application submitted by BTPL is regarding power generation from fuels other than gas / RLNG, therefore, we have no comments to offer in this regard.

We hope that the above meets your requirements.

Regards,

Yours faithfully
SUI NORTHERN GAS PIPELINES LIMITED

(MAJID HUSSAIN)
General Manager (BD-Corporate)
for MANAGING DIRECTOR

Copy to:

- Director General (Gas), Ministry of Energy (Petroleum Division), Islamabad.

REGISTRAR OFFICE
Dlary No: 7330
Date: 06/06/23

Forwarded please ☒ For need action ☐ for information

| | |
|-----------------|------------------|
| 1. DG (Lic.) | 2. DG (Admin/HR) |
| 3. DG (M&E) | 4. DG (CAD) |
| 5. DG (Trd.) | 6. Dir. (Fin.) |
| 7. Dir. (Tech.) | 8. Consultant |
| 9. LA | 10. Dir. (IT) |

For kind information please

| | |
|-------------|-------------------|
| 1. Chairman | 2. M (Tech.) |
| 3. M (Lic.) | 4. M (Trd. & Fin) |
| 5. M (Law) | |

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URS 10001 ISO 14001

Iftikhar Ali Khan
Additional Director General,
Regulatory Office,
NEPRA Tower, Ataturk Avenue (East) G-5/1,
Islamabad.

Subject: - Intervention request in the matter of the application of Bahria Town (Pvt) Limited for the grant of the distribution license.

Reference: - Nepra/R//LAD-52/13682 June 02, 2023.

Dear Sir,

1. This refers to the communications resting with your aforementioned letter informing me that my intervention request of May 4, 2023, will be considered only a written statement. Although there was no mention of whether or not an open hearing of the case would be held, the cheque I had attached with my letter as an intervention fee was also returned to me, indicating that the Authority is going to decide such a critical issue without allowing stakeholders to express their opinions in the open hearing. Since my written statement is 17 pages long and includes more than 40 pages of attachments, I am concerned that it will be rendered meaningless if the grave concerns enumerated therein are not exhaustively examined at the public hearing.
2. I am confident that oral argument in a public hearing provides an excellent opportunity for complainants to interact with the esteemed members of the Authority and to communicate their concerns more persuasively than if they relied solely on written statements. Concurrently, such dialogue helps Authority raise public awareness of its commitment to obtaining a fair and transparent verdict in the best interests of all parties involved.
3. The Authority's attention is also drawn to the fact that hundreds of complaints have been filed with the Customer Affairs Department, along with documentation proving that BTPL is billing them the enormous cost of electricity usage in maintenance service invoices effective February 2023 onwards, which is prohibited by NEPRA's 2011 judgments. So far, the Consumers Affairs Department has forwarded our concerns to BTPL and returned their response without making any effort to address the issue.
4. We would appreciate it if the Authority simply directed the Consumer Affairs Department to revalidate the NEPRA's previous judgment indicated above for the settlement of the complaints that have been waiting for more than four months.

With profound regards

Masood Ur Rehman,

House No. 163 Street-1

Safari Valley Usman D-Block Bahria Town Phase-8

WhatsApp Number; - 0345-5589595

Copies to:

1. Tauseef H. Farooqi, (Chairman, NEPRA).
2. Mathar Niaz Rana, Member (Tariff and Finance).
3. Engr. Maqsood Anwar Khan (Member).
4. Ms. Amina Ahmed, (Member Law).
5. Rafique Ahmad Shaikh (Member Technical).
6. Registrar, NEPRA.

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| 5. DG (TH) | 6. DG (Fin) | |
| 7. DG (Tech) | 8. DG (JPR) | |
| 9. LA | 10. DG (IT) | |

| For kind information please | |
|-----------------------------|--------------------|
| 1. Chairman | 2. M. (Tech.) |
| 3. M. (Lic.) | 4. M. (T.F. & Fin) |
| 5. M. (Law) | |

MDG CRD
DH

10-07-23
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