

Mr. Waseem Anwar Bhinder,
Registrar,
National Electric Power Regulatory Authority (NEPRA),
NEPRA Tower, Attaturk Avenue (East),
Sector G-5/1, Islamabad.

Ref # KE/RA&GR/NEPRA/2025/1215

SUBJECT: MODIFICATION OF KE GENERATION LICENSE [GL/04/2002]

Dear Sir,

K-Electric (KE) has been issued Generation License No. GL/04/2002 on November 18, 2002 ("Generation License") under Section 15 and Section 25 of the NEPRA Act, 1997. In the past, Generation License has been modified by NEPRA from time to time, as per the requests made by KE, with the latest modification ("Modification XI") granted vide NEPRA letter #NEPRA/R/DL/LAG-05/36655-61 dated September 15, 2021.

Keeping in view the fuel availability at SITE Gas Turbine Power Station (SGTPS) and Korangi Town Gas Turbine Power Station (KTGTPS), KE is proposing modification in its Generation License for the approval of the Honorable NEPRA Authority for early retirement / decommissioning of the SGTPS and KTGTPS power plants.

It is respectfully submitted that the proposed modifications will not adversely affect KE's ability to meet demand-supply obligations, nor will it impact consumer tariffs or quality of service.

In light of the above, this application is being submitted under Sub Rule (2) of the Rule 10 of the NEPRA Licensing (Application, Modification, Extension and Cancellation) Procedure Regulations, 2021 for Modifications of the Generation License. In relation, hereto, this is to certify that the following documents enclosed with this modification application are prepared and submitted in conformity with the provisions of the Regulations, and that the Company undertakes to abide by the terms and provisions of the Regulations.

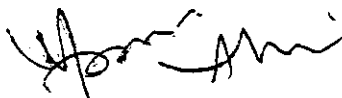
- a. Text of Proposed Modifications
- b. Statement of Reasons and Specifications in support of Modifications
- c. Statement showing the impact on tariff, quality of service and the performance by KE of its obligations under the License
- d. Certified True Copy of Board Resolution
- e. Affidavit

Additionally, please find enclosed cross cheque of Rs. 2,371,795/- (net of withholding tax of Rs. 418,552) having number 0005330 dated September 25, 2025, being the license modification's fee

calculated in accordance with Schedule II to the NEPRA Licensing (Application, Modification, Extension and Cancellation) Procedure Regulations, 2021.

We humbly request the Honorable NEPRA Authority for approval of the requested modification.

Sincerely,



Syed Moonis Abdullah Alvi
Chief Executive Officer

Enclosure:

- Documents as mentioned at serial (a) to (e) above.
- Cheque dated September 25, 2025, for license modification fee

**EARLY RETIREMENT AND DECOMISSIONING OF THE
KORANGI TOWN GAS TURBINE POWER STATION (KTGTPS)
AND
S.I.T.E. GAS TURBINE POWER STATION (SGTPS)**



A. Text of Proposed Modification

K-Electric Limited (KE) humbly seeks the approval of the Honorable NEPRA Authority for early retirement / decommissioning of the Site Gas Turbine Power Station (SGTPS) and Korangi Gas Turbine Power Station (KTGTPS). The proposed early retirement and decommissioning will not adversely affect the quality of service or KE's ability to meet its demand-supply obligations, as elaborated in Part B of this document.

B. Statement of Reasons and Specification in Support of KE's Request

Upon privatization of KE in 2005, under the Implementation Agreement (IA) signed between KE with the Government of Pakistan (GoP) subsequently amended through the Amendment Agreement signed in 2009, SGTPS and KTGTPS plants were added to KE's generation portfolio in 2009 comprising of 32 engines of 3.041 MW each (Gross ISO Capacity). These are gas-based power plants and explicit commitments / allocations were made by the GoP for supply of local gas to these power plants from SSGC. Subsequently, to further enhance efficiency, in 2016, Steam Turbine (ST) of 10 MW each was added at these power plants.

Until 2018, gas supply made to these power plants was sufficient for their optimum utilization, however, owing to depleting reserves of natural gas in the country, supply of local gas to these power plants at adequate pressure started to dwindle. Accordingly, considering the ground reality and for effective utilization of these power plants, as per the directives of the Cabinet Committee on Energy (CCoE) dated April 23, 2018, KE agreed to off-take RLNG supply for its power plants, including SGTPS and KTGTPS, from SSGC. However, even after the shift to RLNG, optimum supply of gas at required pressure has remained a challenge, especially over the last 2 years.

Meanwhile, to manage the growing power demand, KE added a state-of-the-art 900 MW BQPS III power plant along with investments in interconnection capacity enhancement, increasing the interconnection capacity for off-take of supply from National Grid to over 2,000 MW and for which KE has entered into a long-term Power Purchase Agency Agreement (PPAA) with CPPA-G and an Interconnection Agreement (ICA) with the National Grid Company (NGC).

C. Impact on Tariff

It is most respectfully submitted that the proposed modifications will not have any adverse impact on consumer tariffs, infact, consumers will benefit as capacity payments will not be passed onto the consumers.

D. Impact on Quality of Service and the Performance by KE of its Obligations Under the License

As explained in Section B above, the early retirement and decommissioning of SGTPS and KTGTPS plants will neither compromise KE's ability to discharge its obligations under the license, nor affect KE's ability to meet its demand-supply obligation. In this regard, it is humbly reiterated that the Company has already taken concrete steps for adequate supply for its consumers through the addition of 900 MW efficient generation and enhanced interconnection capacity for increased off-take from the National Grid.



Accordingly, KE certifies that service quality and reliability will remain unaffected by this modification, and the Honorable NEPRA Authority may be assured that the request is aligned with KE's commitment to provide reliable and affordable electricity to its consumers.





**CERTIFIED TRUE COPY OF THE BOARD RESOLUTION
PASSED AT 1259TH MEETING OF THE BOARD
HELD ON SEPTEMBER 23, 2025**

**APPROVAL FOR APPLICATION TO NEPRA FOR LICENSEE PROPOSED MODIFICATION (LPM) IN
GENERATION LICENSE FOR EARLY RETIREMENT AND DECOMMISSIONING OF
THE KORANGI TOWN GAS TURBINE POWER STATION (KTGTPS) AND
S.I.T.E. GAS TURBINE POWER STATION (SGTPS)**

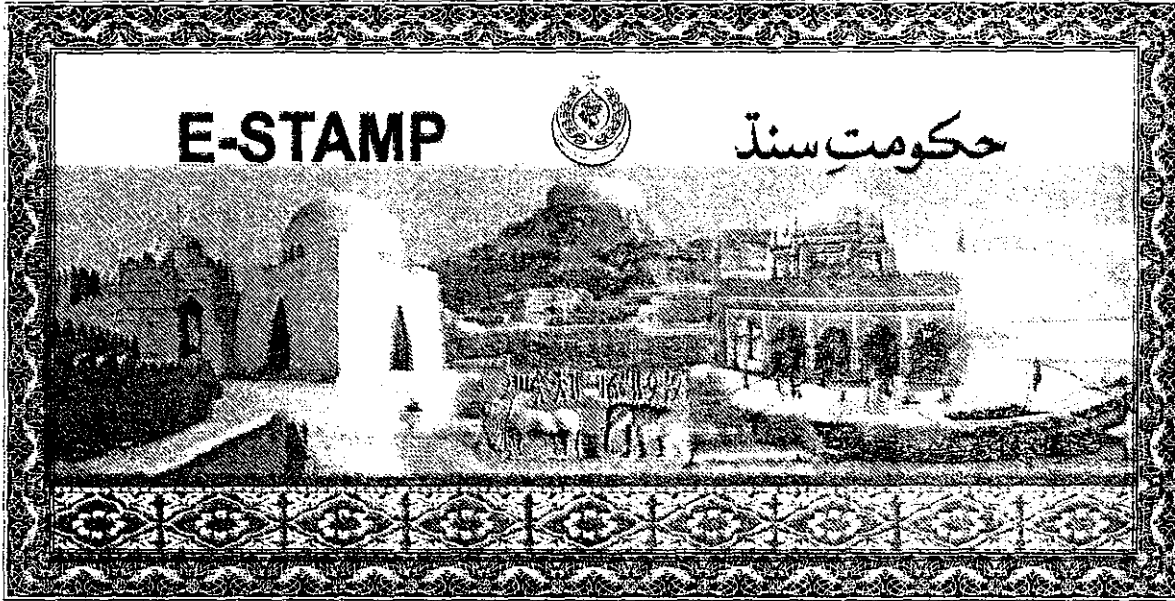
RESOLVED THAT the application for Licensee Proposed Modification in K-Electric (hereinafter referred to as 'the Company') Generation License for early retirement and decommissioning of the Korangi Town Gas Turbine Power Station (KTGTPS) and S.I.T.E Gas Turbine Power Station (SGTPS) be and is hereby approved for submission with the National Electric Power Regulatory Authority (NEPRA), pursuant to Regulation 10 of the NEPRA Licensing (Application, Modification, Extension and Cancellation) Procedure Regulations, 2021.

RESOLVED FURTHER THAT Chief Executive Officer be and is hereby authorized to sign and file the Application for Licensee Proposed Modification in the Company's Generation License with NEPRA and such other deeds, documents, instruments etc., and take all necessary actions incidental and related to the aforesaid Application and appear before NEPRA and admit execution thereof for and on behalf of the Company.

RESOLVED FURTHER THAT Chief Executive Officer be and is hereby authorized to delegate all or any of the powers, vested in him through this resolution, to any officer of the Company and revoke the same at his discretion, as he may deem expedient.

Certified by

Rizwan Pesnani
Chief Risk Officer & Company Secretary



NBP-1862-2505220007519318

GoS-KHI-3BC080AE5D2AF9E7

Non-Judicial

Rs 500/-

Description	: Bond - 10(A)
Indemnifier/Mortgagor	: Raheel Ahmed Adv [42000- 2191425-2]
Indemnified/Mortgagee	: Raheel Ahmed Adv [42000- 2191425-2]
Applicant	: Raheel Ahmed Adv [42000- 2191425-2]
Stamp Duty Paid by	: Raheel Ahmed Adv [42000- 2191425-2]
Issue Date	: 22-May-2025, 02:49:38 PM
Paid Through Challan	: 2025785F0D7AD433
Amount in Words	: Five Hundred Rupees Only

Please Write Below This Line

You can verify your e-Stamp paper by scanning the QR code or online at www.estamps.gos.pk using the 'Verification Through Web' option.

BEFORE THE NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (NEPRA)

AFFIDAVIT of Mr. Syed Moonis Abdullah Alvi s/o Syed Riazuddin Alvi having CNIC No. 42201-6886191-3 Chief Executive Officer, K-Electric Limited (the "Company"), a company incorporated under the laws of the Islamic Republic of Pakistan, having its registered office at KE House, 39-B, Sunset Boulevard, Phase II, Defence Housing Authority, Karachi.

I, the above named deponent, being the duly authorized representative of the Company solemnly affirm and declare that the contents of the Licensee Proposed Modification of the Generation License filed by K-Electric Limited vide Letter Ref No. KE/RA&GR/NEPRA/2025/1215 dated September 26, 2025, including all supporting documents are true to the best of my knowledge and belief and that nothing has been concealed.

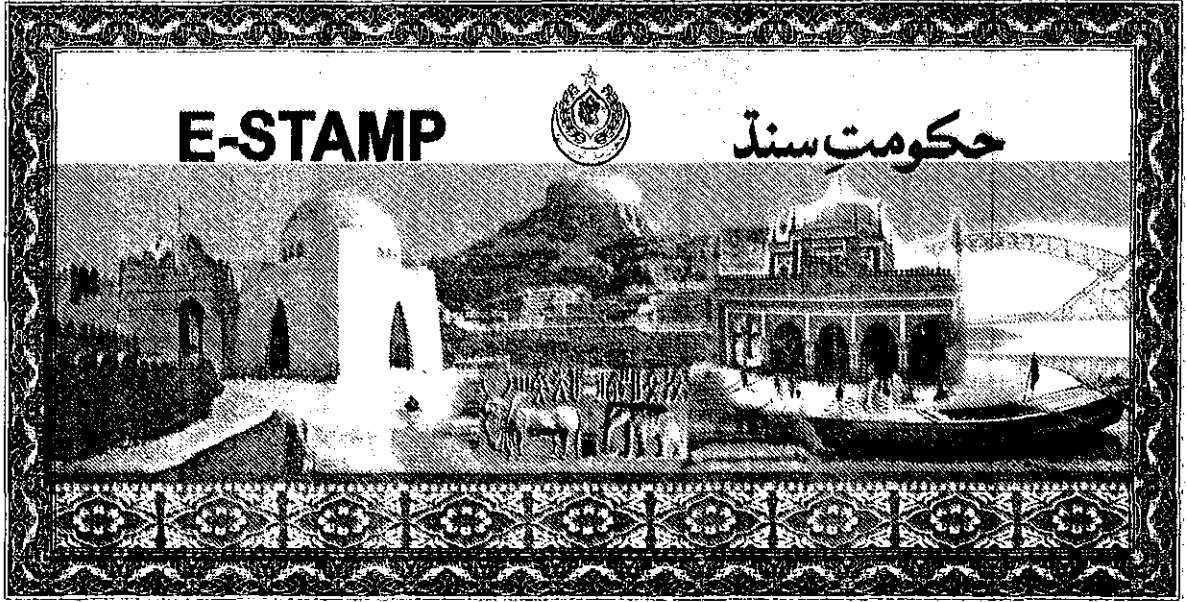
[Signature]
 SYED MOONIS ABDU



Karachi dated Sept 26, 2025

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NBP-1862-2505220007519318

GoS-KHI-3BC080AE5D2AF9E7

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Rs 500/-

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SYED MOONIS ABDU



Karachi dated Sept 26, 2025