



National Electric Power Regulatory Authority
Islamic Republic of Pakistan

NEPRA Tower, Attaturk Avenue (East), G-5/1, Islamabad.
Tel: +92-51-9206500, Fax: +92-51-2600026
Web: www.nepra.org.pk, E-mail: registrar@nepra.org.pk

Registrar

No. NEPRA/DG(M&E)/LAD-05/ 38465

December 14, 2023

Chief Executive Officer,
Lahore Electric Supply Company Limited (LESCO),
22-A, Queens Road,
Lahore.

Subject: **ORDER OF THE AUTHORITY IN THE MATTER OF EXPLANATION ISSUED TO LESCO UNDER REGULATIONS 4(1) AND 4(2) OF NEPRA (FINE) REGULATIONS, 2021, ON ACCOUNT OF FAILURE TO EXECUTE EARTHING/GROUNDING OF HT/LT POLES/STRUCTURES IN ITS SERVICE TERRITORY.**

Please find enclosed herewith, Order of the Authority dated 14th December 2023 (total 10 pages) in the subject matter for information and compliance.

Enclosure: Order of the Authority

(Engr. Mazhar Iqbal Ranjha)



National Electric Power Regulatory Authority

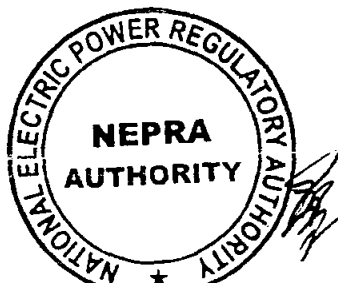
ORDER

**IN THE MATTER OF EXPLANATION ISSUED TO LESCO UNDER REGULATION
4(1) AND 4(2) OF NEPRA (FINE) REGULATIONS, 2021, ON ACCOUNT OF
FAILURE TO EXECUTE EARTHING/GROUNDING OF HT/LT
POLES/STRUCTURES IN ITS SERVICE TERRITORY.**

1. Lahore Electric Supply Company Limited (LESCO) (the "Licensee") was granted a Distribution License (No. 03/DL/2002) by the National Electric Power Regulatory Authority (the "Authority") on 01.04.2002, for providing Distribution Services in its Service Territory as stipulated in its Distribution License, pursuant to section 21 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 ("NEPRA Act").

Background:

2. During the investigation conducted by NEPRA with respect to Fatal Accidents in DISCOs, it was observed that the distribution facilities of DISCOs such as poles/structures lack earthing/grounding which is one of the major causes of the occurrence of fatal accidents. The Authority while taking notice of such serious safety hazards directed the Licensee vide letter dated June 07, 2022, followed by reminder dated July 06, 2022, to submit the data pertaining to the total number of poles/structures, number of poles/structures already earthed/grounded, and number of poles/structures to be earthed/grounded. Accordingly, the Licensee submitted the required information vide its email dated July 21, 2022.
3. The Authority after carefully examined the data submitted by the Licensee called CEO of the Licensee vide letter dated September 26, 2022, for a meeting/hearing via Zoom at NEPRA Head Quarter with the direction to come up with a comprehensive plan along with specific timelines pertaining to execution of earthing/grounding of HT/LT poles/structures in its service territory, in order to avoid fatal accidents in future. The Authority also directed that the Licensee shall submit the response to specific queries/questions including, SOP of the Licensee pertaining to earthing/grounding of the poles/structures, scope of earthing in the contracts at the time of their installation, checking of poles/structures grounding at the time of handing over of the system from construction to operation departments, tackling these hazards in the absence of proper earthing/grounding, and time required to execute the earthing/grounding of 100% of the remaining poles/structures.
4. Accordingly, the said meeting/hearing was held on October 04, 2022, wherein, the Authority directed the Licensee to submit complete details of PCC poles and steel structures with and without earthing/grounding. The Authority further directed the Licensee to submit a comprehensive plan of the execution of earthing/grounding of poles & structures along with concrete timelines. Moreover, the Authority also desired



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that the Licensee should provide a mechanism on how they will efficiently perform the execution task within the minimum possible time. A letter dated October 28, 2022, containing all above directions, followed by Reminder letters were also issued to the Licensee.

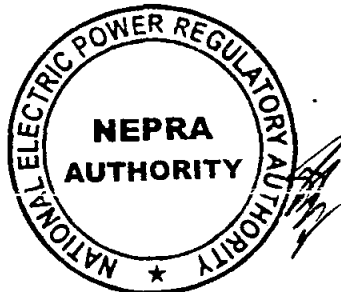
5. In addition to above, NEPRA Regional Office, Lahore, also reported and affirmed that in past contracts, the scope of earthing/grounding was only included in Steel Structures. However, in the latest contracts, the scope of earthing/grounding was included in both the Steel Structures and PCC poles and the same is present in the field too. The Regional Office further highlighted that Steel Structures installed in the past had earthing/grounding, however, the same has become ineffective due to deterioration and change of moisture contents at the sites over the passage of time. The same was also endorsed by the Licensee in its submitted replies.
6. In response to NEPRA's letter dated October 28, 2022, the Licensee vide its letter dated December 02, 2022, submitted its response against the aforementioned directions & queries of the Authority. The Licensee submitted that it is committed to earth its distribution system i.e., HT/LT structures/poles and transformer's substations within five financial years, and the Licensee has earmarked certain amount of funds solely dedicated to this purpose. Moreover, the Licensee also provided a plan to execute earthing grounding of its HT/LT poles/structures, according to which, 84,400 poles/structures will be earthed/grounded per year. The tentative timelines to complete the said work will be five years (FY 2022-2023 to FY 2026-2027). The detail of poles/structures already earthed or to be earthed as submitted by the Licensee is as under:

Total Number of HT/LT Poles/ Structures	Details of HT Poles/Structures			Details of LT Poles/Structures			Total Number of HT/LT Poles/ Structures have Earthing	Total Number of HT/LT Poles/ Structures to be Earthed
	Total Number of HT Poles/ Structures	HT Poles/ Structures have Earthing	HT Poles/ Structures to be Earthed	Total Number of LT Poles/ Structures	LT Poles/ Structures have Earthing	LT Poles/ Structures to be Earthed		
669,753	347,227	130,147	217,080	322,526	117,603	204,923	247,750	422,003

7. The submissions of the Licensee were carefully analyzed and it was noted with concern that approximately 7,000 poles/structures will only be grounded per month, which does not seemed sufficient. Despite facing the same challenges by the Licensee as compared to other DISCOs, the performance of the Licensee appears below par, which shows non-seriousness towards inculcating a safety culture by the Licensee in its service territory.
8. In this regard, NEPRA vide its letter dated January 17, 2023, directed the Licensee to revisit its plan for earthing/grounding of all remaining poles within the minimum possible time. In response, the Licensee vide its letter dated February 13, 2023, submitted that the earthing of the HT/LT poles/structures is being carried out solely by the Licensee staff and manpower. The Licensee further submitted that during the month of Dec-Jan 2023, 6431 HT poles/structures and 8819 LT poles/structures have been earthed grounded. Moreover, the Licensee is trying its best to utilize its existing resource up to its full potential in order to make its system as safe possible.

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9. Keeping in view the aforementioned submissions of the Licensee, it was noted that the Licensee has not revised its plan, and execution of plan on its part was still unsatisfactory. Moreover, the Licensee was giving generic statements that it is trying its best to utilize its existing resource up to its full potential, however, the on ground performance on its part was unsatisfactory. The Licensee should have understood that the operation of poles/structures without earthing/grounding in the field is highly dangerous and can lead to the occurrence of fatal accidents at any time.
10. Therefore, the Authority decided to initiate legal proceedings against the Licensee under NEPRA Fine Regulations, 2021.

Explanation:

11. In view thereof, an Explanation was served to the Licensee under Regulation 4(1) and 4(2) of NEPRA (Fine) Regulation, 2021, vide NEPRA's letter dated April 27, 2023, on account of violation of Performance Standards, Distribution Code, Power Safety Code, and other applicable documents. The salient points of the Explanation are as under:

2. **WHEREAS**, pursuant to section 21(2)(f) of the NEPRA Act, the Licensee is required to follow the performance standards laid down by the Authority for the distribution and transmission of electric power, including safety; and

3. **WHEREAS**, pursuant to Rule 4(g)(ii), Overall Standards 7-Safety of NEPRA Performance Standards (Distribution) Rules:

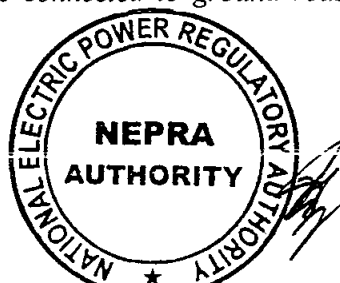
"A distribution company shall ensure that its distribution facilities do not cause any leakage of electrical current or step potential beyond a level that can cause harm to human life, as laid down in the relevant IEEE/IEC Standards; prevent accessibility of live conductors or equipment; and prevent development of a situation due to breakdown of equipment which results in voltage or leakage current that can cause harm to human life, property and general public including without limitation, employees and property of the distribution company."

4. **WHEREAS**, according to clause SR 4 Safety Management Criteria of Distribution Code:

"A distribution company shall ensure that its distribution facilities do not cause any leakage of Electrical Current or Step Potential beyond a level that can cause harm to human life, as laid down in the relevant IEEE/IEC Standards; prevent accessibility of live conductors or equipment; and prevent development of a situation due to breakdown of equipment which results in voltage or leakage current that can cause harm to human life, property and general public including without limitation, employees and property of the distribution company."

5. **WHEREAS**, as per clause DDC 4, Design Code- Earthing of Distribution Code:

"...The earthing of a distribution transformer, the neutral, and body of the transformer should be connected to ground rods as per IEC and PSI



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Standards Design Specifications. Earthing of Consumer Service and its meter shall be as per design standards adopted by the Licensees; and consistent with IEC, and IEEE Standards. The earth resistance of the distribution transformers and HT/LT structures/poles shall not be more than 2.5Ω and 5Ω respectively."

6. **WHEREAS**, pursuant to clause PR 1 Protection System Practices and System Co-ordination of Distribution Code:

"The Licensee shall follow suitable and necessary provisions regarding protection system practices and co-ordination such as the following but not limited to achieve the aims of proper functioning of the distribution system of the Licensee at all times:

h. ...Provide protective earthing devices."

7. **WHEREAS**, as per clauses 12.2.4 and 12.2.5 of Chapter 12 of the Consumer Service Manual:

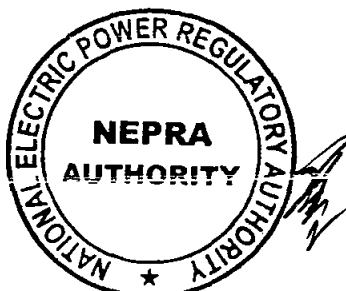
"12.2.4. The earthing systems installed shall be dimensioned and regularly tested to ensure protection from shock hazards.

12.2.5. The steel structure installed on the public places shall be earthed at one point through steel/copper conductor, in accordance with the DISCO laid down procedures."

8. **WHEREAS**, during the investigation conducted by NEPRA with respect to fatal accidents in DISCOs, it was observed that the distribution facilities of DISCOs particularly HT/LT poles/ structures lack earthing/ grounding which is one of the major causes of the occurrence of fatal accidents. The Authority took notice of such serious safety hazards and directed to obtain data from all the DISCOs including the Licensee, with respect to the total number of HT/LT poles/ structures, the number of HT/LT poles/ structures already earthed/ grounded, and the number of HT/LT poles/ structures to be earthed/ grounded. The same was obtained vide Licensee's letter dated July 21, 2022, and the detail is as under:

Total Number of HT/LT Poles/ Structures	Details of HT Poles/Structures			Details of LT Poles/Structures			Total Number of HT/LT Poles/ Structures have Earthing	Total Number of HT/LT Poles/ Structures to be Earthed
	Total Number of HT Poles/ Structures	HT Poles/ Structures have Earthing	HT Poles/ Structures to be Earthed	Total Number of LT Poles/ Structures	LT Poles/ Structures have Earthing	LT Poles/ Structures to be Earthed		
669,753	347,227	130,147	217,080	322,526	117,603	204,923	247,750	422,003

9. **WHEREAS**, a hearing/ meeting on the matter was also held on October 04, 2022, wherein the representatives from all DISCOs including CEO LESCO participated. During hearing/ meeting, the Authority directed all DISCOs along with the Licensee to submit complete details of PCC Poles and steel structures with and without earthing/ grounding. The Authority further directed the Licensee to submit a comprehensive plan of the execution of earthing/ grounding of poles/ structures along with concrete timelines. Moreover, the Authority desired that DISCOs should provide a mechanism on how they will efficiently perform the execution task within the minimum possible time, however, the Licensee has failed to do so; and

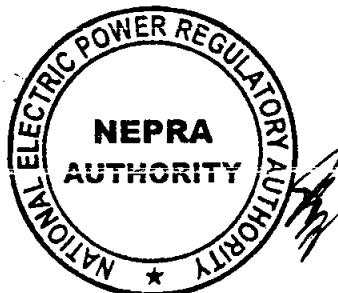


10. **WHEREAS**, vide NEPRA's letter dated October 28, 2022, followed by a Reminder dated December 02, 2022, the Licensee was directed to submit the said information. In response, the Licensee vide its letter received in NEPRA on December 06, 2022, submitted its reply, wherein, the Licensee inter alia, stated that it is committed to earth its distribution system i.e., HT/LT structures/ poles and transformer's substations within five financial years and the Licensee has earmarked a certain amount of funds solely dedicated to this purpose. Moreover, the submitted plan by the Licensee to execute earthing/grounding of its HT/LT poles/ structures, indicates that 84,400 poles/ structures will be earthed/ grounded per year. The tentative timelines to complete the said work will be five years (FY 2022-2023 to FY 2026-2027). In this regard, it is noted with concern that approximately 7,000 poles/ structures will only be grounded per month, which does not seem sufficient to execute the task on a war footing basis. Therefore, the performance of the Licensee appears below par as compared to some other DISCOs, who have committed to ground 40,000 to 50,000 poles/ structures per month. This shows non-seriousness towards inculcating a safety culture by the Licensee in its service territory; and
11. **WHEREAS**, vide NEPRA's letter dated January 17, 2023, the Licensee was again directed to submit its revised plan in the light of observations highlighted by NEPRA. However, the response from the Licensee has not yet been received, despite the lapse of more than two months. Non-submission of response by the Licensee indicates that it does not have any plan to execute this important task. The Licensee is only consuming time and delaying the implementation of the project as till date the on-ground performance of the Licensee is zero. The Licensee should have realized that operation of poles/ structures without earthing/ grounding in the field is highly dangerous and can lead to the occurrence of fatal accidents at any time; and
12. **WHEREAS**, it is a matter of record that despite repeated and continuous correspondence, the Licensee has failed to produce any concrete plan indicating specific timelines for executing the earthing/ grounding of HT/ LT poles/ structures on a war footing basis. Hence, it can be said that the Licensee has, prima facie, violated Section 21(2)(f) of the NEPRA Act, Article 11 of the Distribution License read with Rule 4(g) of the NEPRA Performance Standards (Distribution) Rules, Clause 4 of Safety Requirements, Clause 4 of Design Code & Clause 1 of Protection Requirements of the Distribution Code and Clause 12.2 of Chapter 12 of the Consumer Service Manual; and"
12. The Licensee vide its letter dated June 27, 2023, submitted its response. The summarized points of the same are below:

LESCO acknowledge the receipt of NEPRA letters dated 12.06.2023 & 27.04.2023 regarding the explanation sought under Regulation 4(1) and 4(2) of the NEPRA (FINES) Regulations 2021. LESCO also acknowledge the concerns expressed by the National Electric Power Regulatory Authority (NEPRA) regarding the safety hazards associated with the lack of earthing/ grounding of HT/ LT poles/ structures within Lahore Electric Supply Company Limited's (LESCO) distribution system.

In response to NEPRA's communication, LESCO would like to provide the following explanation and updates regarding the execution of earthing/ grounding of HT/ LT poles/ structures:

Commitment to Safety: LESCO acknowledges the criticality of ensuring the safety of the distribution system and preventing harm to human life, property, and the general public.



LESCO is fully committed to comply with the safety standards and regulations prescribed by NEPRA.

Submission of Data: As per NEPRA's directions, LESCO submitted the data pertaining to the total number of HT/LT poles/structures, the number of poles/structures already earthed/grounded, and the number of poles/structures yet to be earthed/grounded. LESCO trust that the provided information gives NEPRA an accurate understanding of the current situation.

Hearing/Meeting: LESCO participated in the hearing/meeting held on October 04, 2022, where NEPRA directed all distribution companies (DISCOs), including LESCO, to submit complete details of poles and steel structures with and without earthing/grounding. LESCO assures NEPRA that LESCO have taken this direction seriously and have been working diligently to compile the requested information.

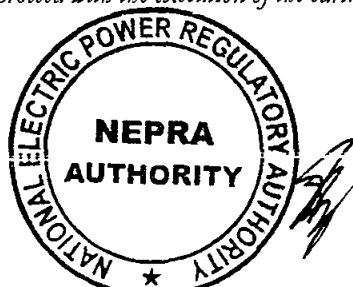
Comprehensive Plan: LESCO recognizes the urgency and importance of executing the earthing/grounding of poles/structures in a timely manner. In response to NEPRA's letter dated December 06, 2022, LESCO presented a comprehensive plan to execute the earthing/grounding work within a period of five financial years. This plan includes earmarked funds dedicated solely to this purpose.

Execution Timeline: While LESCO understand NEPRA's concerns regarding the number of poles/structures to be grounded per month, LESCO assures you that LESCO is continuously reviewing its plan to optimize the execution process. LESCO is committed to working on a war footing basis to expedite the earthing/grounding of HT/LT poles/structures. Efforts are underway to enhance LESCO's execution capacity and increase the number of poles/structures grounded per month.

Revised Plan/Segregated Execution Plan: LESCO acknowledge NEPRA's letter dated January 17, 2023, requesting a revised plan/ segregated execution plan based on the observations highlighted by NEPRA. In compliance of the above-mentioned letter LESCO submitted a revised plan vide LESCO letter No. HSE/17654-57 dated 13.02.2023.

However, LESCO would like to bring to NEPRA's attention that LESCO participated in the hearing/meeting held on October 04, 2022, where NEPRA directed all distribution companies, including LESCO, to provide complete details of poles and steel structures with and without earthing/grounding. During the meeting, the honorable Chairman NEPRA expressed the desire to expedite the work of earthing/grounding of HT/LT poles/structures within a period of two years. After careful consideration of NEPRA's directives and in line with our commitment to ensuring the safety and reliability of the distribution system, LESCO has reviewed its execution plan for the earthing/grounding project. LESCO have revised its plan to complete the work within a two-year timeline, as per the instructions of the worthy Chairman of NEPRA.

It is also pertinent to mention that the initiative for the earthing/grounding of HT/LT poles/structures was taken after the company budget for the fiscal year 2022-23 which had already been planned and finalized. Therefore, no specific funds were allocated for this purpose in the budget. However, LESCO have diligently reviewed its financial plans and is pleased to inform you that sufficient funds are being allocated for earthing/grounding of HT/LT poles/structures in the upcoming budget for the fiscal year 2023-24. With the availability of dedicated funds, LESCO can now proceed with the execution of the earthing/grounding work.



according to the revised two-year plan. These allocated funds will enable to acquire the necessary equipment, and materials required to complete the project effectively and efficiently.

Progress of Earthing/Grounding of HT/LT poles/structures: During the month of Dec-June, 2023, 32248 No. of HT poles/structures and 32882 No. of LT poles/structures have been earthed/grounded. LESCO is trying its best to utilize its existing resources up to its full potential to make the system as safe as possible.

Safety Culture: LESCO is fully committed to promoting a safety culture within its service territory. LESCO is continuously working on enhancing safety measures, implementing best practices, and raising awareness among our employees and stakeholders. Our goal is to minimize risks and ensure a safe environment for our workforce, consumers, and the general public.

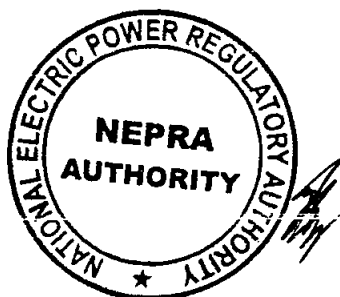
Compliance with NEPRA Act and Regulations: LESCO acknowledges the importance of adhering to the NEPRA Act, Rules, and Regulations. LESCO is dedicated to fulfilling our obligations as a distribution licensee and ensuring compliance with all relevant provisions related to safety, performance standards, and consumer service."

Hearing:

13. Furthermore, in order to satisfy the requirement of law, the Authority decided to provide an opportunity of a hearing to the Licensee in light of Regulation 4 (5) of NEPRA (Fine) Regulations, 2021, before further proceeding in the matter. Accordingly, the said public hearing was held on August 17, 2023, wherein, CEO of the Licensee alongwith his team made following submissions:
- (a) LESCO is trying to ensure its maximum effort in earthing/grounding of its system.
 - (b) LESCO has such an older system, however, due to construction the sizes of poles have been reduced with the dumping soil.
 - (c) LESCO has 6,45,000 number of poles/structures, out of which 415,000 poles/structures were not properly earthed.
 - (d) During FY 2022-23, LESCO executed 65,130 poles HT Poles/Structures and 27,200 LT Poles/Structures.
 - (e) LESCO prepared a plan in December 2022 to complete the earthing/grounding of poles/structures in five years.
 - (f) Upon the directions of NEPRA, the execution plan has been shrunk to two years, and according to that plan, we shall earth 280,000 poles/structures (LT 100,500 and HT 85,500) in 2023-24.
 - (g) LESCO has issued directions to all operational circles to expedite the process on priority. New poles are being installed with the provision of earthing system.

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Analysis/Findings:

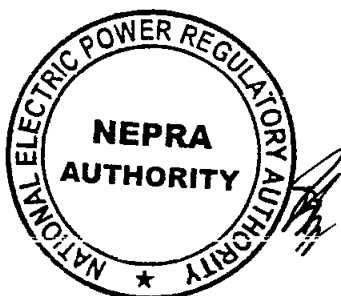
14. The Licensee has submitted that it recognizes the urgency and importance of executing the earthing/grounding of poles/structures in a timely manner. The Licensee has further submitted that, in response to NEPRA's letter dated December 06, 2022, the Licensee presented a comprehensive plan to execute the earthing/grounding work within a period of five financial years. Later, a revised plan vide the Licensee letter dated February 13, 2023, in the light of observations highlighted by NEPRA was also submitted.

In this regard, the Authority has considered the submissions of the Licensee and is of the view that the submissions of the Licensee have been considered and it is observed that earlier the Licensee submitted a five-year execution plan for earthing/grounding of its remaining poles/structures i.e., 422,003. The same seemed unrealistic as the time frame proposed by the Licensee was irrational keeping in view the sensitivity of the issue. Therefore, NEPRA criticized the same and raised some observations. Regarding the Licensee's revised plan, it is worth commenting that despite the revision, the Licensee had still proposed a five-year execution plan, aiming to complete approximately 84,401 poles/structures per year. Moreover, the Licensee provided a general statement that after outsourcing the task, the frequency of earthing/grounding of poles/structures per month will be increased and correspondingly the given timeline will also be reduced. The Licensee did not submit any firm numbers with respect to the reduction of timelines by increasing the number of poles/structures to be executed. This indicates the non-seriousness of the Licensee toward the removal of such serious safety hazards and subsequently compliance with the Authority's directions.

15. The Licensee has further submitted that after serious concerns raised by NEPRA, the Licensee again reviewed its execution plan and has revised the same within a two-year timeline. The Licensee has claimed that it has done this as per the instructions of the worthy Ex-Chairman NEPRA.

In this regard, the submissions of the Licensee has been considered by the Authority and it is commented that the honorable Ex-Chairman NEPRA directed all the DISCOs to execute the task within the minimum possible time but not maximum of upto two years. The Licensee has now submitted a two-year timeframe to execute the remaining number of poles/structures i.e. 356,873. This illustrates that approx. 15,000 poles/structures per month will be executed. It is relevant to mention here that the revised execution plan of the Licensee is still below par as compared to other DISCOs who have committed to earth/ground approx. 40,000 to 50,000 poles/structures per month. If the Licensee follows the same scheme, there would have been a chance to complete the task in less than a year. This shows the Licensee's non-seriousness towards inculcating Safety culture in its territory.

16. The Licensee has submitted that the initiative for the earthing/grounding of HT/LT poles/structures was initiated after the company budget for the fiscal year 2022-23, which had already been planned and finalized. Therefore, no specific funds were allocated for this purpose in the budget. The Licensee has further submitted that it has diligently reviewed its financial plans and is pleased to inform you that sufficient funds are being allocated for earthing/grounding of HT/LT poles/structures in the upcoming budget for the fiscal year 2023-24.

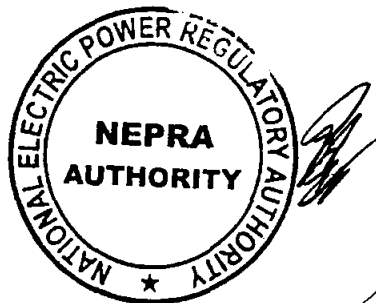


In this regard, the Authority after going through the submissions of the Licensee is of the considered opinion that the Licensee has shown its inability by admitting that earthing/grounding of poles/structures was not part of its earlier budgets. It is important to emphasize that earthing/grounding of poles/structures is an ongoing maintenance requirement and should be part of O&M funds being utilized by it every year. This reveals that there is no concept of preventive maintenance in the Licensee particularly in addressing such critical safety hazards.

17. The Licensee has submitted that it is fully committed to promoting a safety culture within its service territory. The Licensee has further submitted that it is continuously working on enhancing safety measures, implementing best practices, and raising awareness among our employees and stakeholders. The Licensee's goal is to minimize risks and ensure a safe environment for our workforce, consumers, and the general public.

In this regard, the submissions of the Licensee have been considered and examined by the Authority and it is observed that the same are far away from the ground realities. It is a matter of fact that the Licensee has failed to inculcate a Safety culture in its territory and its distribution system became glaringly exposed during the monsoon season in July 2023. It is on record that the rain spells of July 2023 witnessed a total of twelve fatal accidents. Unfortunately, five of these fatalities were particularly due to lack of proper earthing/grounding within the Licensee's distribution system. This has raised significant concerns regarding the Licensee's operational and maintenance plans, practices, governance, and overall commitment to adhere with safety standards. Consequently, it appears that the Licensee's submissions exist predominantly on paper only and lack tangible implementation on the ground. Hence, it is constrained to believe that the Licensee has failed to inculcate safety culture in its service territory.

18. The submission made in response to the explanation is evasive and fails to recognize this imperative obligation.



19. **Decision**

After due deliberations and taking into account the submissions/arguments made by the Licensee during the hearing and in light of the NEPRA Act, NEPRA (Fine) Regulations, 2021, and other applicable documents, the Authority is of the considered opinion that the Licensee has failed to provide any satisfactory reply to the Explanation served to it, therefore, the Authority hereby decides to issue a Show Cause Notice to the Licensee in terms of Regulations 4(8) & (9) of the NEPRA (Fine) Regulations, 2021.

AUTHORITY

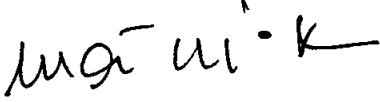
Rafique Ahmed Shaikh
Member (Technical)



Engr. Maqsood Anwar Khan
Member (Licensing)




Mathar Niaz Rana (nsc)
Member (Tariff & Finance)



Amina Ahmed
Member (Law)



Waseem Mukhtar
Chairman



Dated 14/12/2023