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National Electric Power Regulatory Authority

Islamic Republic of Pakistan

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No. NEPRA/DG(M&E)/LAD-08/ **3457**

March 20, 2024

Chief Executive Officer

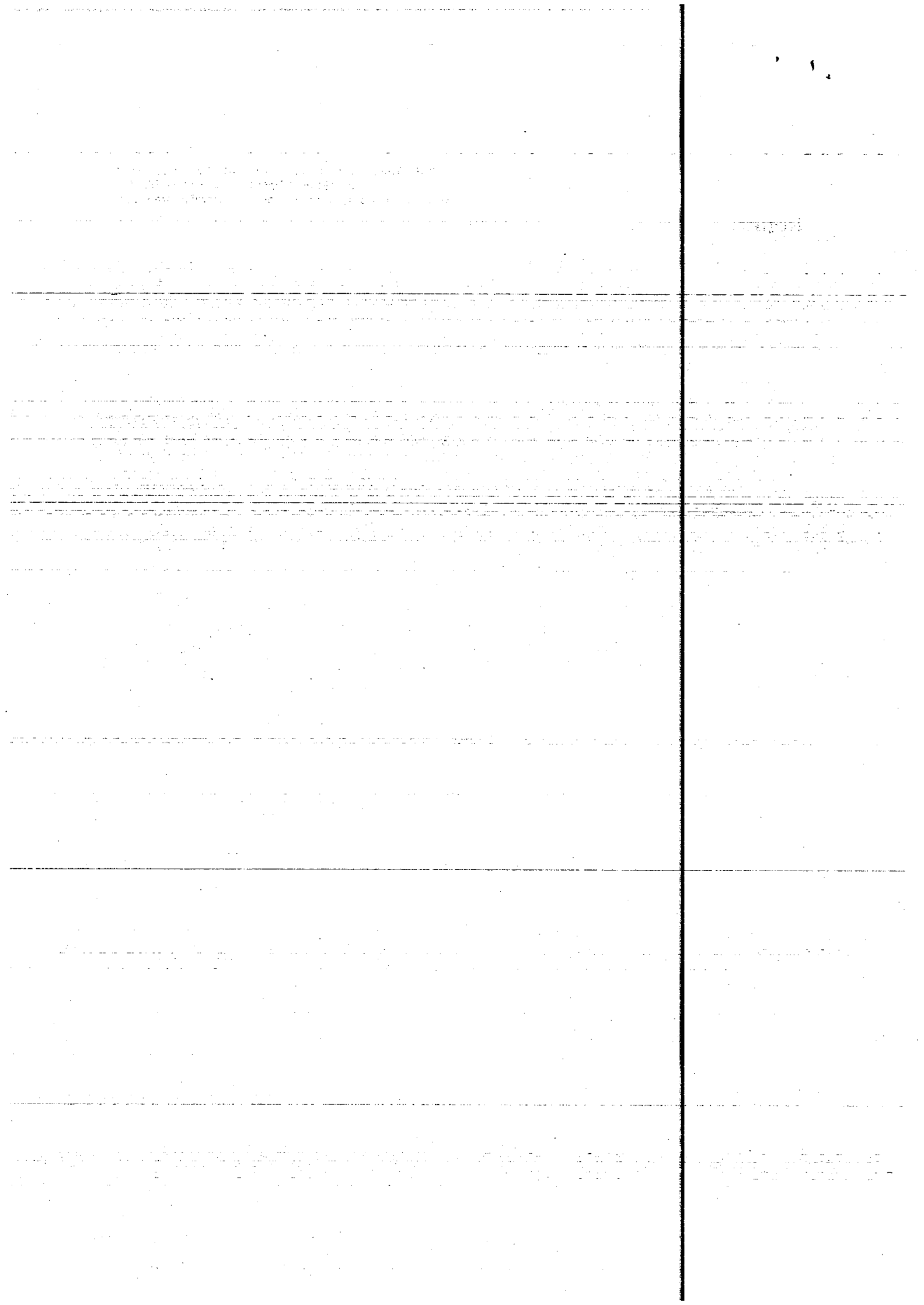
Hyderabad Electric Supply Company Limited (HESCO),
WAPDA House, Hussainabad,
Hyderabad

Subject: **ORDER OF THE AUTHORITY IN THE MATTER OF EXPLANATION ISSUED TO HESCO UNDER REGULATIONS 4(1) & 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, the Order of the Authority (total 10 pages) in the subject matter for information and compliance.

Enclosure: Order of the Authority (total 10 Pages)

(Engr. Mazhar Iqbal Ranjha)





National Electric Power Regulatory Authority

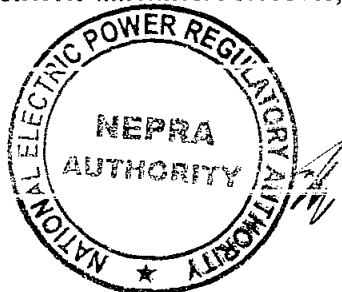
ORDER

IN THE MATTER OF EXPLANATION ISSUED TO HESCO 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. Hyderabad Electric Supply Company Limited (HESCO) (the "Licensee") was granted a Distribution License (No. DL/05/2023 dated 09.05.2023) by the National Electric Power Regulatory Authority (the "Authority") 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 reminders dated July 06, 2022, and August 02, 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 August 16, 2022.
3. The Authority after carefully examining 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

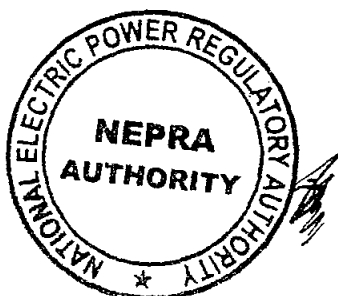


that the Licensee should provide a mechanism on how they will efficiently perform the execution task within the minimum possible time. A letter dated October 28, 2022, containing all above directions, followed by Reminder letter dated December 02, 2022, and various telephonic calls was also issued to the Licensee.

5. In addition to above, NEPRA Regional Office, Hyderabad, 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 is being 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 09, 2022, inter alia, submitted that the earthing of Poles/Structures will be replaced/completed by the end of the financial year 2023, after procurement of rods. In this regard, it was observed that the Licensee just submitted a generic statement pertaining to earthing/grounding of poles rather giving any concrete plan, which indicated its non-seriousness towards execution of the earthing on a war footing basis. 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		
470,380	281,506	104,251	177,255	188,874	74,259	114,614	178,511	291,869

7. Moreover, vide NEPRA's letter dated January 17, 2023, the Licensee was again directed to submit its specific plan in the light of observations highlighted by NEPRA. In response, the Licensee vide its letter dated February 06, 2023, submitted that their BoD has approved the procurement of 100,000 rods for earthing/grounding in the first phase which will be installed within the shortest possible time subject to the availability of material. Furthermore, the Licensee submitted the revised surveyed numbers of poles/structures that are required to be earthed i.e. 381,713, which are more than its earlier submitted numbers.
8. In this regard, it was noted with the concern that the procurement of only 100,000 rods as compared to 381,713 poles/structures again shows the Licensee's intentions towards rectification of such severe safety hazard. The Licensee should have realized that operation of poles/structures without earthing/grounding in field is highly dangerous and could lead to the occurrence of fatal accidents at any time. Further, submission of the revised number of poles/structures by the Licensee shows that it has now completed the survey after a lapse of five months. Whereas, the Licensee claimed in its earlier letter that it will execute earthing by the end of FY 2023 which now seems impractical. All these statements clearly indicate that the Licensee does not have any plan to execute this important task. The Licensee is trying to mislead the Authority by hiding its inefficiencies.



9. It is a matter of record that despite repeated and continuous correspondence, the Licensee failed to produce any concrete plan indicating specific timelines for executing the earthing/grounding of HT/LT poles/structures on a war footing basis. Therefore, the Authority decided to initiate legal proceedings against the Licensee under NEPRA Fine Regulations, 2021.

Explanation:

10. 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:

3. **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

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

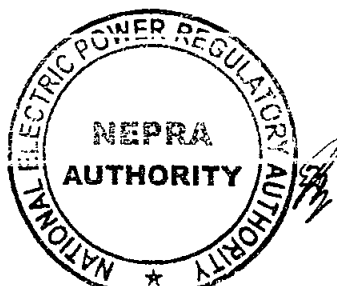
"A distribution company shall ensure that its distribution facilities do not cause any leakage of electrical current or step potential beyond a level that can cause harm to human life, as laid down in the relevant IEEE/IEC Standards; prevent accessibility of live conductors or equipment; and prevent 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."

5. **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."

6. **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 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."

7. **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."

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

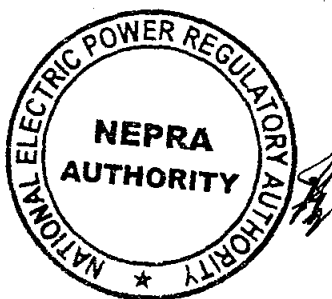
"12.2.4. The earthing systems installed shall be dimensioned and regularly tested to ensure protection from shock hazards.

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."

9. **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 Email dated August 16, 2022, and the detail is as under:

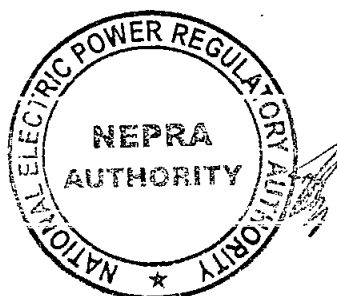
Total Number of HT/LT Poles/ Structures	Details of HT Poles/Structures			Details of LT Poles/Structures			Total Number of HT/LT Poles/ Structures have Earthing	Total Number of HT/LT Poles/ Structures to be Earthed
	Total Number of HT Poles/ Structures	HT Poles/ Structures have Earthing	HT Poles/ Structures to be Earthed	Total Number of LT Poles/ Structures	LT Poles/ Structures have Earthing	LT Poles/ Structures to be Earthed		
470,380	281,506	104,251	177,255	188,874	74,259	114,614	178,511	291,869

10. **WHEREAS**, a hearing/meeting on the matter was also held on October 04, 2022, wherein the representatives from all DISCOs including CEO HESCO 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 submit the same; and

11. **WHEREAS**, vide NEPRA's letter dated October 28, 2022, followed by a Reminder dated December 02, 2022, and through various telephonic reminders, the Licensee was repeatedly directed to submit the said information. In response, the Licensee vide its letter dated December 09, 2022, submitted its reply, wherein, the Licensee inter alia, stated that the earthing of Poles/Structures will be replaced/completed by the end of the financial year 2023, after procurement of rods. In this regard, it was observed that the Licensee just submitted a generic statement pertaining to earthing/grounding of poles rather giving any concrete plan. Providing generic statements by the Licensee indicates its non-seriousness towards execution of the earthing on a war footing basis; and
12. **WHEREAS**, vide NEPRA's letter dated January 17, 2023, the Licensee was again directed to submit its specific plan in the light of observations highlighted by NEPRA. In response, the Licensee vide its letter dated February 06, 2023, submitted that their BoD has approved the procurement of 100,000 materials for earthing/grounding in the first phase which will be installed within the shortest possible time subject to the availability of material. Moreover, the Licensee submitted the revised surveyed numbers of poles/structures that are required to be earthed i.e. 381,713, which are more than its earlier submitted numbers; and
13. **WHEREAS**, the procurement of only 100,000 rods as compared to 381,713 poles/structures again shows the Licensee's intentions towards inculcating a safety culture. The Licensee should have realized that operation of poles/structures without earthing/grounding in field is highly dangerous and could lead to the occurrence of fatal accidents at any time. Further, submission of the revised number of poles/structures by the Licensee shows that it has now completed the survey after a lapse of five months. Whereas, the Licensee claimed in its earlier letter that it will execute earthing by the end of FY 2023 which now seems impractical. All these statements clearly indicate that the Licensee does not have any plan to execute this important task. The Licensee is trying to mislead the Authority by hiding its inefficiencies; and
14. **WHEREAS**, it is a matter of record that despite repeated and continuous correspondence, the Licensee has failed to produce any specific number of HT/LT poles/structures along with its concrete plan indicating specific timelines. The Licensee also failed to submit the so-far progress for executing the earthing/grounding of HT/LT poles/structures as per its original phase wise plan. 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"



11. The Licensee submitted its response vide its letter dated May 11, 2023, against the served Explanation. The summarized points of the Licensee's response are narrated below:

"Preliminary Objections and Submissions:

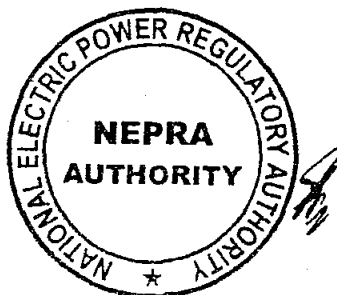
1. That it is respectfully submitted at the outset that HESCO, being a distribution licensee of NEPRA is fully aware of its responsibilities to provide safe and reliable electric power services to its consumers and has always endeavored to fulfill its obligations in accordance with the applicable laws.
2. That neither any specific contravention of law has been alleged against HESCO in the "explanation" for which penal action is proposed to be taken and nor there available any 'Rules' providing for the "procedures" in case of any such contravention as per requirement of section 46(2)(d) of the NEPRA Act, 1997.
3. That it is mentioned in the "Explanation" that some investigation was conducted by NEPRA with respect to the fatal accidents in DISCOs, which would mean that it is generic in nature for which no "Explanation" could be issued.
4. That the explanation has been issued under NEPRA (Fines) Regulations, 2021 which are framed under section 47 of the NEPRA Act, 1997 (the Act). It is submitted with respect that section 47 of the Act does not authorize the Authority to frame "Regulations" for the purposes of imposition of fines owing to any contravention of the provisions of NEPRA laws. Instead, section 46(2)(d) requires inter-alia that for the procedure in case of any contravention of any provision of the Act, Rules are to be framed. Such Rules are not in field, therefore, prima facie the subject "explanation" is against the provisions of the NEPRA Act, 1997.

Parawise reply of the Explanation:

Paras 1 to 9 of the "explanation" are factual in nature; therefore, no response is required as such.

Paras 10-14 In reply, to these paras, it is submitted that HESCO being a responsible Company, is already giving weightage to the directions/instructions of the Honorable Authority and it can never even think of making any violation thereof. It is submitted that within the service territory of HESCO, there are about 403,057 H.T & L.T structures and about 38,209 distribution Transformers. In order to comply with the directions of the Authority and for making arrangements for "earthing" of those structures and distribution Transformers, HESCO has decided to outsource the complete activity and for the purposes of Complete Earthing of Distribution Transformer Mounted Sub-Stations and earthing to each and every H.T/LT structure, expressions of Interest have already been sought from the interested firms for which advertisements were published

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in the national English as well as Urdu Newspapers on 7.4.2023. In response, 5 Firms obtained the detailed Requests for Proposals and a Pre-Bid Conference also held on 27.4.2023. Now the last date for submission of the proposal is 22nd of May, 2023 and thereafter, the process of outsourcing of the work regarding earthing of all the Distribution Transformer Mounted Sub-Stations and all HT/LT structures shall be completed as early as possible.

Para 15 In reply to this para, it is submitted that HESCO has not violated any of the applicable documents as mentioned in this para.

Para 16 The above given explanation may kindly be considered by the Authority with a request to close the proceedings in the interest of justice."

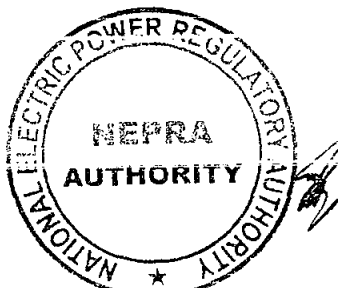
Hearing:

12. 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 hearing was held on October 10, 2023, wherein, CEO of the Licensee alongwith his team made following submissions:
 - i. There are approximately 259,000 HT and 143,000 LT poles/structures in the service territory of HESCO.
 - ii. Out of the total poles/structures approximately 127,000 poles/structures are already earthed and the remaining 275,000 are required to be earthed.
 - iii. In order to outsource the earthing of remaining poles/structures, the case was presented before BoD HESCO for approval.
 - iv. After getting approval from the BoD, the advertisement was published in newspaper to invite potential bidders, however, no bid was received. Therefore, HESCO could not fulfill its commitment, despite the efforts being made.
 - v. Almost 140,000 earth rods are available in HESCO's store.
 - vi. HESCO could not execute the work through own manpower due to shortage of staff. However, we are trying our level best to execute the work on priority.

Analysis/Findings:

13. The Licensee has submitted that at the outset HESCO, being a distribution licensee of NEPRA is fully aware of its responsibilities to provide safe and reliable electric power services to its consumers and has always endeavored to fulfill its obligations in accordance with the applicable laws.

In this regard, the Authority has considered the submissions of the Licensee and is of the view that, on the contrary being fully aware of its obligations, the Licensee has miserably failed in the performing and discharging of its duties and obligations which



it was obligated to follow all the directions of the Authority in accordance with applicable documents.

14. The Licensee has further submitted that neither any specific contravention of law has been alleged against HESCO in the "explanation" for which penal action is proposed to be taken and nor there available any 'Rules' providing for the "procedures" in case of any such contravention as per requirement of section 46(2)(d) of the NEPRA Act, 1997.

In this regard, the Authority has considered the submissions of the Licensee and vehemently denied them. Moreover, the Authority further observes that specific breaches by the Licensee are set out in the served Explanation with reasonable detail and the assertion that no contravention of law has been alleged is baseless and deliberately misleading.

15. The Licensee has also submitted that it is mentioned in the "Explanation" that some investigation was conducted by NEPRA with respect to the fatal accidents in DISCOs, which would mean that it is generic in nature for which no "Explanation" could be issued.

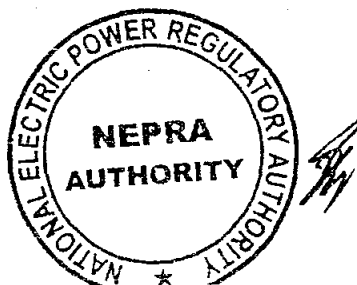
In this regard, the Authority after considering the submissions of the Licensee is of the view that it is preposterous to assume that the investigation carried by NEPRA is genuine in nature. The assertion is frivolous and not supported with facts and circumstances which have been amply laid in explanation. Due process of law been complied with.

16. The Licensee has submitted that the explanation has been issued under NEPRA (Fines) Regulations, 2021 which are framed under section 47 of the NEPRA Act, 1997 (the Act). It is submitted with respect that section 47 of the Act does not authorize the Authority to frame "Regulations" for the purposes of imposition of fines owing to any contravention of the provisions of NEPRA laws. Instead, section 46(2)(d) requires inter-alia that for the procedure in case of any contravention of any provision of the Act, Rules are to be framed. Such Rules are not in field, therefore, prima facie the subject "explanation" is against the provisions of the NEPRA Act, 1997.

In this regard, the Authority has considered the submissions of the Licensee, and after carefully examining the same, observes that the position of the Licensee is based on a misreading of the law, or a deliberate attempt to cause confusion. It is further submitted that neither Section 46 nor Section 47 expressly make reference to 'fines' and with the argument being towed by the Licensee, the Authority and/or the Federal Government should not have the mandate to prescribe either Rules or Regulations for the regulation of fines to be imposed by the Authority for a contravention under the NEPRA Act. It is submitted that the Authority does not subscribe to the unsubstantiated and preposterous argument advanced by the Licensee. It is submitted that the Authority is due exercise of its powers under the NEPRA Act has framed the NEPRA (Fines) Regulations, 2021.

17. The Licensee has inter-alia, submitted that it being a responsible Company, is already giving weightage to the directions/instructions of the Honorable Authority and it can never even think of making any violation thereof.

The Authority has considered the submissions of the Licensee and observes that the Licensee's submissions are far away from ground realities as there is no significant



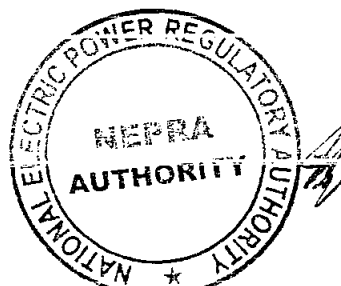
progress regarding execution of earthing of HT/LT poles/structures despite a lapse of more than one year. Moreover, if the submissions of the Licensee are assumed to be true, then there should have been zero fatalities in its territory. However, thirty-two fatalities (2 Employees and 30 Public) occurred in FY 2020-21 and thirty-five fatalities (3 Employees and 32 Public) occurred in FY 2021-22. This reveals that the Licensee is unable to develop safety culture and also failed to provide electric services in its territory in a safe and reliable manner. In addition, the Licensee has failed to rectify serious safety hazards, particularly earthing/grounding of HT/LT poles/structures, which caused the leakage current & harm to human life.

18. The Licensee has further submitted that within its service territory, there are about 403,057 H.T & L.T structures and in order to comply with the directions of the Authority and to make arrangements for "earthing" of those structures, it has decided to outsource the complete activity. For this purpose, expressions of Interest have already been sought from the interested firms for which advertisements were published in the national English as well as Urdu Newspapers on 07.04.2023. In response, five firms obtained the detailed Requests for Proposals, and a Pre-Bid Conference was also held on 27.04.2023. Now the last date for submission of the proposal is 22nd of May, 2023, and thereafter, the process of outsourcing of the work regarding earthing of all HT/LT structures shall be completed as early as possible. However, during the hearing, the Licensee submitted that no bid was received, therefore, it is unable to fulfill the commitment.

The Authority has gone through the submissions of the Licensee and noted with concern that the Licensee has started to carry out the task after almost one year of the direction of NEPRA. However, the Licensee being a distribution licensee should have initiated such efforts a lot earlier which it failed to do. NEPRA has taken up this matter since June 2022 and repeatedly directed the Licensee to submit a concrete plan and subsequently provide monthly progress reports. However, no single progress report has yet been submitted by the Licensee which again shows that the Licensee has not earthed any single pole/structure despite the lapse of more than one year. Hence it appears that the submissions of the Licensee are only on paper but not on the ground. Moreover, still, the Licensee has stated that it will complete the task as early as possible but has not given any concrete timelines because no bid was received in response to the advertisement of EOI.

19. During hearing in the matter of Explanation, the Licensee submitted that almost 140,000 earth rods are available, but the earthing could not be executed through own manpower due to shortage of staff.

The Authority has considered the submissions of Licensee and observes that the Licensee is showing extreme negligence. On one hand, none of the bidders is participating in executing earthing, and on the other hand, the Licensee is not ready to carry out the task through its own staff. The consumers/general public have been left at the mercy of almighty ALLAH. This is a height of sluggishness which is being expressed by the Licensee and it has no any guilt in this regard. The Licensee has to understand that the operation of poles/structures in the field without earthing is highly dangerous which could lead to electrocution, especially during monsoon season. The Licensee has to take measures on a war footing basis in order to save precious lives. However, apparently, the Licensee is taking this matter in very casual manner which has serious repercussions. Therefore, it can be said that the Licensee is in violation of



the NEPRA Act, Performance Standards, Power Safety Code, and other applicable documents.

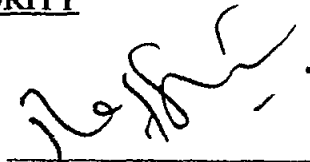
20. The issue of Safety and the responsibility of the Licensee to take all proactive measures so that such accidents do not occur cannot be over-emphasized. The submissions of the Licensee are evasive and fail to recognize this imperative obligation. The Licensee's inefficiencies, mismanagement, lack of performance, and reckless attitude are criminal and deserve no latitude.

21. 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

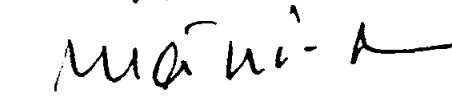
Rafique Ahmed Shaikh
Member (Technical)



Engr. Maqsood Anwar Khan
Member (Licensing)



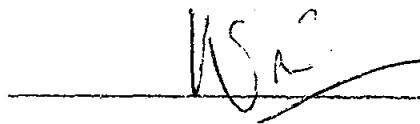
Mathar Niaz Rana (nsc)
Member (Tariff)



Amina Ahmed
Member (Law)



Waseem Mukhtar
Chairman



Dated 20/03/2024

