



**Registrar**

# **National Electric Power Regulatory Authority**

## **Islamic Republic of Pakistan**

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No. NEPRA/SA(M&E)/LAG-11/ 16360

October 09, 2025

Chief Executive Officer  
Tapal Energy Pvt. Ltd. (TEL)  
F-25, Block-5, Kehkashan,  
Clifton, Karachi

Subject: **Order of the Authority in the matter of Explanation issued to M/S Tapal Energy Limited under Regulation 4(1) & 4(2) of the NEPRA (Fine) Regulations, 2021**

Please find enclosed herewith, the Order of the Authority (total 12 pages) in the subject matter for information.

Enclosure: **As above**

  
(Wasim Anwar Bhinder)

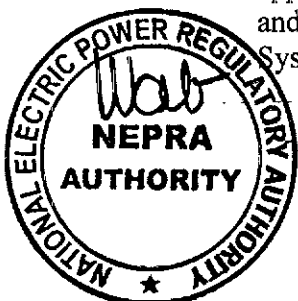


## National Electric Power Regulatory Authority

### In the matter of Explanation issued to M/s Tapal Energy Limited under Regulation 4(1) & 4(2) of the NEPRA (Fine) Regulations, 2021

#### Order

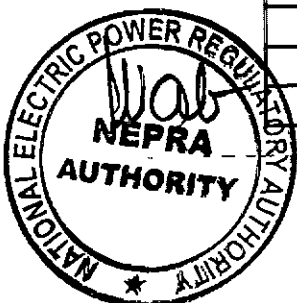
1. The National Electric Power Regulatory Authority (herein after referred to as the "Authority" or the "NEPRA") established under Section 3 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (herein after referred to as the "NEPRA Act") is mandated to regulate the provisions of electric power services.
2. Pursuant to Section 15 of the NEPRA Act (now section 14B after promulgation of Regulation of Generation, Transmission and Distribution of Electric Power Amendment Act 2018), the Authority has granted a Generation License (No. IPGL/010/2003, dated 26/08/2003) to Tapal Energy Pvt. Ltd. (TEL) (hereinafter referred to as the "Licensee") to engage in the generation business as stipulated in its Generation License.
3. Pursuant to Section 14B(4) of the NEPRA Act, in the case of a generation facility connecting directly or indirectly to the transmission facilities of the national grid company, the licensee shall make the generation facility available to the national grid company for the safe, reliable, non-discriminatory, economic dispatch and operation of the national transmission grid and connected facilities.
4. According to Rule 10(6) of the NEPRA Licensing (Generation) Rules, 2000, the licensee shall at all times comply with the provisions of the Grid Code, including, without limitation, in respect of the availability of the net capacity or in respect of the outages, maintenance and operation of its generation facilities, and shall provide the national grid company with all information reasonably required by the later to enable it to dispatch the generation facilities of the licensee.
5. Clause OC 8.1.1 of Operation Code-System Recovery of Grid Code deals with the procedures for the restoration of power supplies following a Total Shutdown or a Partial Shutdown of the System and the re-synchronization of specific parts of the System that have been islanded.
6. Clause OC 8.1.4 of Operation Code-System Recovery of Grid Code states that OC 8 applies to the System Operator, NTDC, distribution companies, Operators of power plants, and Users of the System. Contingency arrangements are required to be established by the System Operator with each externally-connected Party/consumers.



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7. Clause OC 8.2.1 of Grid Code states that a total shutdown of the System is a situation when there is no internal generation online and operation and there is no power supply available from external-connections. The restoration of power supply from such a situation is a Black start recovery. A partial shutdown is when there is no online operating generation or External Connection to a part of the System Operator to instruct Black Start Recovery procedures to restore supplies to that part of the system.
8. Clause OC 8.2.2 of Grid Code states that during restoration of power supplies following a Total Shutdown or Partial Shut Down of the System, it may be necessary to operate the system outside normal frequency and voltage as stated in OC 4. It may also be necessary for the System Operator to issue instructions that are contrary to the balancing mechanism or code, and also to normal contractual obligations in order to ensure restoration of supplies.
9. Clause OC 8.2.3 of Grid Code states that following a total Shutdown of the System designated power plants that have the ability to Start Up without any External Connection to the system shall be instructed to commence Black Start recovery procedures. These procedures, which are to be agreed in advance, may include the restoration of blocks of focal load demand that can be restored in agreement with the local distribution company. Local procedures may include the restoration of power supplies via Embedded Generators. The System Operator has the responsibility for the re-energization of the interconnected transmission system, and the re-synchronization of the stem blocks of islanded blocks of locally restored supplies.
10. The power system breakdown occurred on 23.01.2023 at 07:34:43:800 Hrs which plunged the whole country into darkness and the system was completely restored on 24.01.2023 after 20 hours approximately. NEPRA, being a regulator of power sector, took serious notice of the above incident and constituted an Inquiry Committee (IC) to probe into the matter. The IC visited power houses, grid stations, sites and offices in the process of inquiry. During the course of inquiry, the matter was examined in detail by inquiring the concerned officials and in the process, relevant documents were also obtained to arrive at the right conclusion.
11. The IC noticed that K-Electric Limited (hereinafter referred to as the "KE") started its restoration at 0832 Hrs on 23.01.2023 through the Licensee's Power Plant as the same was equipped with black start facility. However, the Licensee's Power Plant could not sustain and tripped multiple times which severely hampered the restoration process. The details of the tripping are as follows:

S.No.	Synchronization Date & Time	Tripping Date & Time
1.	0832 Hrs on 23.01.2023	1251 Hrs on 23.01.2023
2.	1423 Hrs on 23.01.2023	1622 Hrs on 23.01.2023
3.	1643 Hrs on 23.01.2023	1734 Hrs on 23.01.2023
4.	Back feed via Baldia	1859 Hrs on 23.01.2023
5.	2107 Hrs on 23.01.2023	-



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12. In view of the above, the Authority observed that the Licensee has, prima facie, failed to perform its operations and discharge its responsibilities in accordance with Section 14B (4) of the NEPRA Act, Rule 10(6) of the NEPRA Licensing (Generation) Rules, 2000 and Clauses OC 8.1.1, 8.1.4, 8.2.1 8.2.2 & 8.2.3 of the Grid Code. In view of the foregoing, the Authority decided to initiate legal proceedings against the Licensee under the NEPRA (Fine) Regulations, 2021 (hereinafter referred to as the "Fine Regulations, 2021").

**Explanation to TEL:**

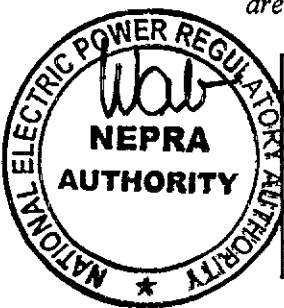
13. Accordingly, an Explanation dated 08.08.2023 was issued to the Licensee under Regulation 4(1) & 4(2) of the Fine Regulations, 2021. The salient features of the Explanation are as follows:

*WHEREAS, the National Electric Power Regulatory Authority (herein after referred to as the "Authority" or the "NEPRA") established under Section 3 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (herein after referred to as the "NEPRA Act") is mandated to regulate the provisions of electric power services; and*

2. *WHEREAS, pursuant to Section 15 of the NEPRA Act (now section 14B after promulgation of Regulation of Generation, Transmission and Distribution of Electric Power Amendment Act 2018), the Authority has granted a Generation License (No. IPGL/010/2003, dated 26/08/2003) to Tapal Energy Pvt. Ltd. (hereinafter referred to as the "Licensee") to engage in the generation business as stipulated in its Generation License; and*

3. *WHEREAS, the power system breakdown occurred on 23.01.2023 at 07:34:43:800 Hrs which plunged the whole country into darkness and the system was completely restored on 24.01.2023 after 20 hours approximately. NEPRA, being a regulator of power sector, took serious notice of the above incident and constituted an Inquiry Committee (IC) to probe into the matter. The IC visited power houses, grid stations, sites and offices in the process of inquiry. During the course of inquiry, the matter was examined in detail by inquiring the concerned officials and in the process, relevant documents were also obtained to arrive at the right conclusion; and*

4. *WHEREAS, the IC noticed that K-Electric Limited (hereinafter referred to as the "KE") started its restoration at 0832 Hrs on 23.01.2023 through the Licensee's Power Plant as the same is equipped with black start facility. However, the Licensee's Power Plant could not sustain and tripped multiple times which severely hampered the restoration process. The details of the tripping are as follows:*



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4.	Back feed via Baldia	1859 Hrs on 23.01.2023
5.	2107 Hrs on 23.01.2023	-

5. *WHEREAS, pursuant to Section 14B (4) of the NEPRA Act, in the case of a generation facility connecting directly or indirectly to the transmission facilities of the national grid company, the licensee shall make the generation facility available to the national grid company for the safe, reliable, non- discriminatory, economic dispatch and operation of the national transmission grid*

and connected facilities, subject to the compensation fixed by the Authority for voltage support and uneconomic dispatch directed by the national grid company; and

6. *WHEREAS, according to Rule 10 (6) of the NEPRA Licensing (Generation) Rules, 2000, the licensee shall at all times comply with the provisions of the grid code, including, without limitation, in respect of the availability of the net capacity or in respect of the outages, maintenance and operation of its generation facilities, and shall provide the national grid company with all information reasonably required by the latter to enable it to dispatch the generation facilities of the licensee; and*

7. *WHEREAS, Clause OC 8.1.1 of Grid Code deals with the procedures for the restoration of power supplies following a Total Shutdown or a Partial Shutdown of the System and the re-synchronization of specific parts of the System that have been Islanded; and*

8. *WHEREAS, Clause OC 8.1.4 of Grid Code states that OC 8 applies to the System Operator, NTDC, distribution companies, Operators of the power plants, and Users of the System. Contingency arrangement are required to be established by the System Operator with each Externally-connected Party/Consumers; and*

9. *WHEREAS, Clause OC 8.2.1 of Grid Code states that a total shutdown of the System is a situation when there is no internal generation online and operation and there is no power supply available from external-connections. The restoration of power supply from such a situation is a Black start recovery. A partial shutdown is when there is no online operating generation or External Connection to a part of the System Operator to instruct Black Start Recovery procedures to restore supplies to that part of the system; and*

10. *WHEREAS, Clause OC 8.2.2 of Grid Code states that during restoration of power supplies following a Total Shutdown or Partial Shut Down of the System, it may be necessary to operate the system outside normal frequency and voltage as stated in OC 4. It may also be necessary for the System Operator to issue instructions that are contrary to the balancing mechanism or code, and also to normal contractual obligations in order to ensure restoration of supplies; and*

11. *WHEREAS, Clause OC 8.2.3 of Grid Code states that following a total Shutdown of the System designated power plants that have the ability to Start Up without any External Connection to the system shall be instructed to commence Black Start recovery procedures. These procedures, which are to be agreed in advance, may include the restoration of blocks of focal load demand that can be restored in agreement with the local distribution company. Local procedures may include the restoration of power supplies via Embedded Generators. The System Operator has the responsibility for the re-energization of the interconnected transmission system, and the re-synchronization of the stem blocks of islanded blocks of locally restored supplies; and*

12. *WHEREAS, in view of the above, the Licensee has, prima facie, failed to comply with Section 14B (4) of the NEPRA Act, Rule 10(6) of the NEPRA Licensing Generation Rules, 2000 and Clauses OC 8.1.1, 8.1.4, 8.2.1 8.2.2 & 8.2.3 of the Grid Code; and*

13. *WHEREAS, the Licensee is required to follow the provisions of NEPRA Act, Rules & Regulations made thereunder, generation license, tariff determinations and other applicable documents and any violation thereof attracts appropriate proceedings against the licensee including but not limited to the imposition of fines under NEPRA (Fine) Regulations, 2021; and*



14. *NOW THEREFORE, in view of the above, Licensee is hereby called upon under Regulation 4(1) and 4(2) of the NEPRA (Fine) Regulations, 2021 to either admit or deny the occurrence of the above-mentioned violations of the Section 14B (4) of the NEPRA Act, Rule 10(6) of the NEPRA Licensing Generation Rules, 2000 and Clauses OC 8.1.1, 8.1.4, 8.2.1, 8.2.2 & 8.2.3 of the Grid Code and in case of your failure to respond within fifteen (15) days of receipt thereof, the Authority shall proceed in accordance with law including but not limited to imposition of fine.*

**Submissions made by TEL:**

14. In response, the Licensee submitted its reply vide letter dated 17.08.2023. The same has been summarized as under:

- i. The Company has in good faith assisted KE in restoration of power by providing black start facility free of any cost and charge to KE.
- ii. The account of relevant events and actions taken by the Company on January 23, 2023 is given below:
  - a. As stated in the NEPRA's Inquiry Report dated March 14, 2023 on the Total Power Blackout on January 23, 2023, KE's total load was 1246 MW at the time of the power system breakdown, out of which 708 MW was imported from NTDC and the remaining 538 MW was taken from BPQS III (498 MW) and SNPC (40 MW).
  - b. The Company was declared available but was not dispatched by KE at that time, in accordance with the Economic Merit Order list of KE as the total demand was being met through cheaper generation available to KE.
  - c. The Company's plant has fully functional Black Start facility to start the engines, to energize and synchronize the Company's plant from a completely shut down position. At the request of KE Black Start facility was made available to KE in good faith without any cost or compensation and on a reasonable effort basis.
  - d. It may be noted that the Company has, in the past also provided its support through Black Start Facility during restoration of power supply, after total or partial shutdowns. This support by the Company has been acknowledged on various occasions by KE and has also been acknowledged by NEPRA in Inquiry Report of Partial System Collapse on October 13, 2022 and Inquiry Report of Total System Collapse on January 09, 2021.
  - e. On January 23, 2023, KE also requested for Black Start Facility from the Company and initiated the restoration process in island mode at 0832 hrs. However the KE system could not sustain the restoration process which resulted in multiple tripping of the Company's plant. The detailed account of each attempt by the Company to support KE in restoration of power is given below:



### **1<sup>st</sup> Attempt:**

- On KE's instructions, the Company's plant started dispatch at 0832 Hrs, through 132 KV Baldia Circuit as a Black Start facility in Island mode
- Diesel Generators (DGs) were started and synchronized gradually under close coordination with KE until dispatch reached 65 MW at 1245 Hrs.
- A surge occurred in 132KV system at 1245 Hrs.
- Resultantly all running DGs tripped simultaneously at 1251 Hrs.

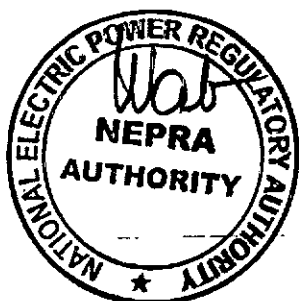
### **2<sup>nd</sup> Attempt:**

- On KE's instructions, the Company's plant started dispatch at 1423 Hrs. through 132 KV Baldia Circuit as a Black Start facility in Island mode.
- DGs were started and synchronized gradually under close coordination with KE until dispatch reached 75 MW at 1619 Hrs.
- A surge occurred in 132KV system at 1619 Hrs.
- Resultantly all running DGs tripped at 1622 Hrs.

### **3<sup>rd</sup> Attempt:**

- On KE's instructions, the Company's plant again initiated Black Start process in Island mode and started dispatch at 1643 Hrs
- DGs were started and synchronized gradually under close coordination with KE until dispatch reached 28 MW at 1730 Hrs.
- KE instructed to normalize the system i.e. from island mode to complex mode.
- KE instructed for maximum load.
- All DGs were started and synchronized to meet KE's instruction for maximum load.
- Again a surge occurred in 132KV system at 1734 Hrs.
- All running DGs tripped again at 1734 Hrs.
- However, this time the Company's plant received Back feed through 132 KV Baldia Circuit at 1744 Hrs.
- Dispatch reached 105 Mw at 1-859 Hrs.
- Surge occurred again on 132KV system of Baldia & Hubchowki at 1859 Hrs.
- Resultantly all running DGs tripped.
- The Company's plant received back feed through 132 KV Baldia circuit at 2012 Hrs.
- Dispatch reached 58 MW at 2040 Hrs.
- Surge occurred again on 132KV system at 2040 Hrs.
- All running DGs tripped again.

### **4<sup>th</sup> Attempt:**



- K-Electric again requested the Company to initiate Black Start process in Island mode through 132 KV Baldia Circuit at 2055 Hrs.
- DGs were started and synchronized gradually under close coordination with KE.
- The Company's plant was restored from 2107 Hrs and continued to dispatch 85 MW as per the instructions of KE.

It is evident from the foregoing that the multiple tripping of the Company's plant was due to Surge in the KE's Grid System.

**Clarification by KE:**

15. In view of the above, clarification was obtained from KE, vide letter dated 19.09.2023. In response, KE, vide letter dated 05.10.2023, submitted its reply, wherein, KE, inter alia, submitted that the Licensee's Power Plant was unable to cope with sudden changes of the network during restoration process and as a result faced multiple tripping. Moreover, KE submitted that the Licensee's Power Plant consists of small engines, each of 10 MW, which have low inertia values and are sensitive to grid disturbance.

**Constitution of the Tribunal by the Authority:**

16. In view of the foregoing, the Authority decided to constitute a Tribunal, comprising the following professionals, under Section 11 of the NEPRA Act, to determine the subject matter after hearing the parties and reviewing the relevant record:
- |      |                       |                    |
|------|-----------------------|--------------------|
| i.   | Mr. Imran Kazi        | SA (M&E)           |
| ii.  | Mr. Khawar Hanif      | Director (M&E)     |
| iii. | Mr. Gul Hassan Bhutto | Consultant (CTBCM) |
| iv.  | Mr. Junaaid Ahmed     | DD (M&E)           |
17. Moreover, the Authority also allowed the Tribunal to co-opt any relevant professional from the then National Power Control Centre (NPCC) for assistance during the course of proceedings in the matter. Accordingly, NPCC was asked to nominate any experienced/relevant professional from their side. In response, NPCC conveyed the nomination of Mr. Imtiaz Ahmed, Dy. Manager as professional expert from their side for the subject task.
18. Accordingly, the Tribunal visited the Licensee's Power Plant and KE Head Office, Karachi and conducted meetings with their relevant senior technical officials on 04.01.2024 and 05.01.2024 respectively. Subsequently, some essential information was sought from TEL and KE.



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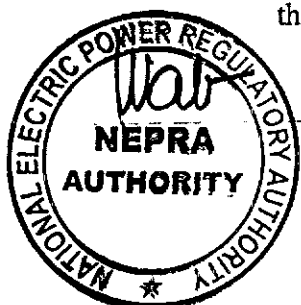


### Report of the Tribunal:

19. Following an exhaustive review, the Tribunal, with one member in dissent, concluded that the Licensee had failed to substantiate its claims regarding the shortcomings of KE's system.

### Hearing:

20. In view of the above, the Authority decided to provide an opportunity of hearing to the Licensee, under Regulation 4(5) of the Fine Regulations, 2021, before proceeding further. Accordingly, hearing in the matter was held on 20.02.2025 at the NEPRA Head Office, Islamabad, wherein, the representatives of the Licensee participated and made their submissions.
21. During the hearing, the Authority directed the Licensee to provide written comments and substantiate their claim along with credible supporting data/evidences. In response, the Licensee, vide letter dated 26.02.2025, has submitted its reply. The same is summarized as follows:
- i. At the outset, the Company would like to bring to the Authority's attention that the Company's plant has been inoperative since June 20, 2024, following the expiry of the NEPRA tariff period. As a result, the majority of our staff members have been released, our office is currently operating with a limited workforce. Despite these challenges, we ensured representation at the Hearing by sending our most senior technical resource, Mr. Shoaib Arshad, who has served as our Plant Manager for many years and was duly authorized to represent the Company. Additionally, our senior team, remained engaged throughout the Hearing via the Zoom link provided by the Authority's office. We regret that we were unable to attend in person and appreciate your understanding in this regard.
  - ii. A copy of the relevant log sheets are attached to this letter, as recorded evidence to demonstrate that the multiple tripping incidents at the Company's Plant were caused by surges in KE's 132kV grid system. The Documentary Evidence clearly indicates that the Company's Plant made multiple attempts and successfully initiated the Black Start procedure four times, following KE's instructions. However, each attempt failed due to surges in KE's System, not due to any fault or deficiency in the Company's Plant. The Company's Black Start facility remained fully functional, and the tripping incidents were a direct result of KE's unstable grid conditions, which were beyond the Company's control. This was also explained in detail to the Authority's team during their visit to our plant on January 4, 2024.
  - iii. Additionally, we would like to emphasize our detailed response submitted to the Authority, i.e. the Company's Response in reply to the Authority's Letter.



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We reaffirm that the Company has consistently complied with its legal, regulatory and contractual obligations.

iv. Furthermore, we find it pertinent to highlight the following relevant statutory provisions:

a. **NEPRA Act:**

It is important to note that the obligations under Section 14B(4) of the NEPRA Act are explicitly "*subject to the compensation fixed by the Authority for voltage support and uneconomic dispatch directed by the national grid company*". However, the Authority has not set any such compensation in any of our tariff determinations to date.

b. **Take and Pay Regime of the Reference Tariff:**

Furthermore, the Company was operating under the Authority's determination dated November 22, 2023 (the "Reference Tariff") which was structured on a take-and-pay basis, specifically tailored considering the active power it dispatches. Although the term of the Reference Tariff ended on June 19, 2024, it remains under review before the NEPRA Appellant Tribunal on account of being an unviable tariff due to its financial unviability for the continued operations of the Complex. Notably, the Reference Tariff did not account for costs associated with start/stop, ramp-up/ramp-down, reactive power, voltage support or black start services. Consequently, the Company has no contractual obligation to commit to any emergency procedures. Nevertheless, the Company maintains its internal black start procedures, which are diligently followed during the restoration of the system from a total or partial shutdown.

c. **Power Purchase Agreement:**

It may be noted that there was no power purchase agreement in force between KE and the Company as the PPA expired on June 19, 2022. However, Clause 5.7 of the PPA between KE and the Company for the operational period of June 20, 2019, to June 19, 2022 stated that:

*"The Company shall co-operate with the Power Purchaser in developing Emergency procedures for the Complex, including recovery from a local or widespread electrical blackout through its Black Start facility and voltage reduction to effect load curtailment, and shall, to the extent consistent with the Technical Limits, comply with such Emergency procedures. For the avoidance of doubt, the provision of Black Start services by the Company shall be on a reasonable effort basis and the inability to provide such services shall bear no liability for Company nor shall any payment for Dispatched and Delivered Net Electric Output be withheld on account of the same."*



In view of the aforementioned provisions and considering the absence of a contractual obligation or agreed compensation for the Company to provide black start services to KE, the activation of the black start facility on January 23, 2023, was extended to KE as a goodwill gesture and on a best-effort basis.

**d. NEPRA Licensing (Generation) Rules, 2000:**

As per Rule 12 of the NEPRA Licensing (Generation) Rules, 2000, it is stated that:

*"Ancillary services. —*

*(1) From and after the date specified in this behalf by the Authority, by notification in the official Gazette, the licensee shall have the right to offer, provide and charge for ancillary services apart from the electrical energy and net capacity made available or provided pursuant to the generation license.*

*(2) Except as provided otherwise in the generation license, prior to the date referred to in sub-rule (1), nothing contained in these rules shall be construed so as to —*

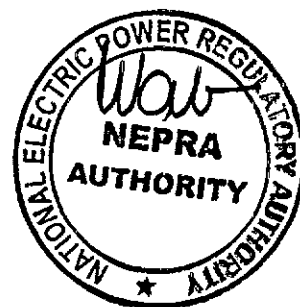
- (a) regard ancillary services independent of or separate from electric power; or*
- (b) confer a right on the licensee to offer, provide or charge for ancillary services as services independent of or separate from the availability of net capacity or generation of electrical energy, and all references to the obligations of the licensee in connection with the availability of net capacity or generation of electrical energy shall mean and include ancillary services.*

*(3) The provision of ancillary services shall be in accordance with the terms of the applicable documents.*"

It is further highlighted that under the Generation Rules, 'Ancillary Services' have been defined as:

*"the services ancillary or incidental to the safe, reliable, stable and efficient availability and utilization of electrical energy and net capacity and include, without limitation, the following, namely: -*

- (a) energy imbalance service;*
- (b) spinning reserve service;*
- (c) supplemental reserve service;*
- (d) reactive supply and voltage control service;*
- (e) regulation and frequency response service;"*



e. **The Grid Code:**

Reliance may also be placed on relevant provisions from the Grid Code 2023 and the Grid Code 2005, relevant extracts of which have been reproduced below:

Extract of Clause OC 5.1.3 of the Grid Code, 2023 states that:

*"System Services mentioned in OC 5.1.1 (a) to (d) above are Ancillary Services and its provision, as per the requirements of the SO, shall be considered mandatory for all Users, except for the Black Start service, within the limits established in this OC and, if applicable, the corresponding Connection Agreement."*

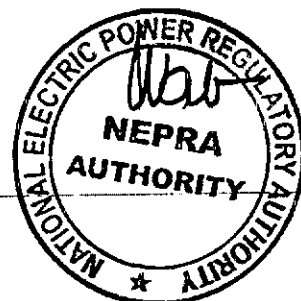
Extract of Clause OC 8.2.3 of the Grid Code, 2005 states that:

*"Following a Total Shutdown of the System, designated power plants that have the ability to Start Up without any External Connection to the system shall be instructed to commence Black Start Recovery procedures. These procedures, which are to be agreed in advance, may include the restoration of blocks of local loads that can be restored in coordination with the local distribution company. Local procedures may include the restoration of power supplies via Embedded Generators. The System Operator shall be responsible for the re-energization of the Transmission System, and the re-synchronization of the system blocks of islanded blocks of locally restored supplies."*

- v. The Company has previously provided support through Black Start facility during the restoration of power supply following total or partial shutdowns. This support has been acknowledged on various occasions by KE and was also recognized by the Authority in its Inquiry Report of Partial System Collapse dated October 13, 2022, and Inquiry Report of Total System Collapse dated January 09, 2021.
- vi. In view of the above, the Company has acted in good faith and in full compliance with its obligations. The Black Start service was provided with full diligence and as a goodwill gesture despite of no contractual requirement or compensation framework in place. We respectfully request the Authority to consider these facts and we remain available for any further clarifications.

**Findings of the Authority:**

- 22. The Authority has gone through the submissions of the Licensee, and observes that the Licensee has provided satisfactory reply to the Explanation issued to it.

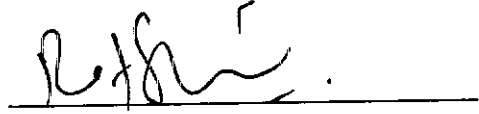


**Decision of the Authority:**

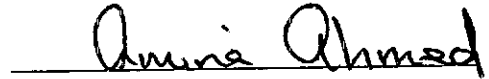
23. In view of the above, the Authority decides to accept the response submitted by the Licensee to the Explanation issued to it and order to close the matter in terms of Regulation 4(12) of the Fine Regulations, 2021.

**Authority**

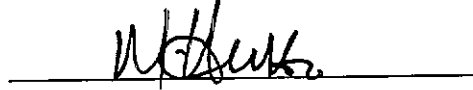
Rafique Ahmed Shaikh  
Member (Technical)



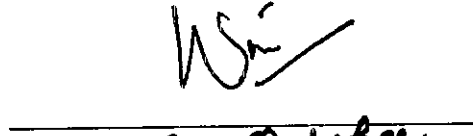
Amina Ahmed  
Member (Law)



Engr. Maqsood Anwar Khan  
Member (Development)



Waseem Mukhtar  
Chairman



Announced on 9th October, 2025 at Islamabad.

