National Electric Power Regulatory Authority
Islamic Republic of Pakistan

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No. NEPRA/SA(M&E)/LAD-05/19699 November 17, 2025

Chief Executive Officer,
Lahore Electric Supply Company (LESCO),
22-A, Queen's Road Lahore

SUBJECT: **ORDER OF THE AUTHORITY IN THE MATTER OF SHOW CAUSE NOTICE ISSUED TO LESCO UNDER SECTION 27B OF THE NEPRA ACT READ WITH OTHER RELEVANT RULES & REGULATIONS OF THE NEPRA ACT REGARDING FATAL ACCIDENTS OCCURRED IN LESCO DURING THE FISCAL YEAR 2023-2024**

Please find enclosed herewith, the Order of the Authority (total 19 pages) in the subject matter for information and compliance.

Enclosure: **As above**

Wasim Anwar

(Wasim Anwar Bhinder)

NATIONAL ELECTRIC POWER REGULATORY AUTHORITY

ORDER

IN THE MATTER OF SHOW CAUSE NOTICE ISSUED TO LESCO UNDER SECTION 27B OF THE NEPRA ACT READ WITH OTHER RELEVANT RULES & REGULATIONS OF THE NEPRA ACT REGARDING FATAL ACCIDENTS OCCURRED IN LESCO DURING THE FISCAL YEAR 2023-2024.

1. Lahore Electric Supply Company (the "Licensee") is a distribution company that has been granted distribution licensee No. DL/03/2023 by the National Electric Power Regulatory Authority (the "Authority") under sections 20 and 21 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 ("NEPRA Act"), for providing of the distribution services of electric power in its service territory.

2. **Background:**

2.1. As per Sections 7.45.3 and 7.45.4 of the Power Safety Code 2021, the Licensee is required to report any incident involving an employee, contractor, or member of the general public to NEPRA within 24 hours through the NEPRA Incident Reporting Portal. Accordingly, the Licensee has submitted details of twelve (12) accidents that occurred during the fiscal year (FY) 2023–2024 within Licensee's service territory, resulting in the loss of thirteen (13) human lives.

3. **Summary of the Investigation:**

3.1. The Honorable Authority took serous notice of fatalities and constituted an Investigation Committee (the "IC") under Section 27A of the NEPRA Act. The IC was mandated to determine whether any violation or substantive non-compliance of the provision of law and applicable documents have been committed by the Licensee, and to ascertain the associated facts and cause(s) of actions. Accordingly, notice issued to the Licensee vide letter No. NEPRA/DG(M&E)/LAD-05/14762-63 dated Sep 20, 2024.

3.2. The IC conducted investigation and submitted its report before the Honorable Authority.

3.2.1. **Employee Accidents**

Direct Cause: Electrocution

No.	Employee Name	Common Root Causes
1	Mr. Muhammad Naeem Toor, LM-I	• **Lack of Planning.** • **Failure to obtain PTW.** • **Failure to use PPE.** • **Lack of Portable Earthing.** • **Inadequate Supervision.**
2	Mr. Abdul Shakoor, LM-I	
3	Mr. Muhammad Kashif, (Crane Operator)	
4	Mr. Muhammad Ashfaq, Meter Reader	
5	Mr. Umar Draz, ALM	
6	Mr. Masood Maqbool, LM-II	
7	Mr. Rana Muhammad Ali, LM-II	

Direct Cause: Pole Collapse while de-conducting of deteriorated pole.

8	Mr. Muhammad Yousaf, LM-II	• **Lack of Planning.** • **Improper Work Method.** • **Lack of Inspection.** • **Inadequate Supervision.**

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3.2.2. **Contractor Accidents**

Direct Cause: Pole Collapse while de-conducting of deteriorated pole.

9	Mr. Muhammad Afzaal (Contractor Worker)	• Lack of Planning. • Lack of Infrastructure Inspection. • Inadequate Supervision.

3.2.3. **Public Accidents**

Direct Cause: Electrocution

No.	Contractor & Public Name	Root Causes
10	Ms. Fatima and Mr. Shahbaz (Public)	• **Undersized and obsolete "Gopher" conductor installed at 11 kV in place of dog or rabbit conductor.** • **Lack of Preventive Maintenance.**
11	Mr. Ghulam Rasool (Shan) (Public: Private Worker)	• **Unauthorized Work by LESCO Emp.** • **Misidentification of Feeder.** • **Failure to obtain Permits to Work.**
12	Mr. Liaqat Ali (Public: Private Electrician)	• **Unauthorized Personnel Involvement by LESCO Emp.** • **Failure to obtain Permits to Work.** • **Failure to use of Personal Protective Equipment.** • **Inadequate Portable Earthing** • **Inadequate Supervision.**

3.3. After detail deliberations by the Honorable Authority, LESCO is held responsible for all twelve (12) accidents based on the investigation report and directed to initiate legal proceedings against the Licensee under Section 27B of the NEPRA Act.

Sr. No.	Description	Accident	Fatality	Accident Responsibility	
				LESCO	Non LESCO
1.	Employee	8	8	8	0
2.	Contractor	1	1	1	0
3.	Public	3	4	3	0
Total		**12**	**13**	**12**	**0**

4. **Show Cause Notice:**

4.1. A Show Cause Notice bearing No. NEPRA/DG(M&E)/LAD-05/3775 was issued to Licensee on March 12, 2025. The key highlights of the Show Cause Notice are summarized below:

*8. **WHEREAS,** according to the Investigation Report, it revealed that seven (7) accidents of LESCO employees occurred due to electrocution, primarily caused by a lack of planning, failure to obtain a PTW, failure to use Personal Protective Equipment (PPE), lack of portable earthing, and inadequate supervision. These factors resulted in the fatalities of Mr. Muhammad Kashif (Crane Operator), Mr. Rana Muhammad*

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Ali (LM-II), Mr. Muhammad Naeem Toor (LM-I), Mr. Abdul Shakoor (LM-I), Mr. Muhammad Ashfaq (Meter Reader), Mr. Umar Draz (ALM), and Mr. Masood Maqbool (LM-II). The Licensee has failed to adhere to statutory obligations, principles, and parameters established for prudent utility practices. Consequently, the Licensee is in violation of Section 21(2)(f) of the NEPRA Act, Article 19 of the Distribution License, read with Rule 4(g) of the NEPRA Performance Standards (Distribution) Rules, 2005, DDC 4 of the Distribution Code, Clause SR 4 of the Safety Management Criteria, PR 1 of the Protection System Requirements of the Distribution Code, and Clauses 7.12.5, 7.15.1, 7.15.2, 7.15.5, 7.20.1, 7.20.4, 7.22.1, 7.25.1, and 7.28.2 of the Power Safety Code 2021, as well as Chapter 12 of the Consumer Service Manual.

9. ***WHEREAS,*** *according to the Investigation Report, it revealed that an accident of LESCO employee occurred due to pole collapse, primarily caused by a lack of planning, improper work method, lack of inspection, and inadequate supervision, which resulted in the fatality of Mr. Muhammad Yousaf (LM-II). The Licensee has failed to adhere to statutory obligations, principles, and parameters established for prudent utility practices. Consequently, the Licensee is in violation of Section 21(2)(f) of the NEPRA Act, Article 19 of the Distribution License read with Rule 4(g) of the NEPRA Performance Standards (Distribution) Rules, 2005, DDC 4 of the Distribution Code, Clause SR 4 of Safety Management Criteria and PR 1 of Protection System Requirements of Distribution Code, Clauses 7.12.5, 7.15.1, 7.15.2, 7.15.5, 7.20.1, 7.20.4, 7.22.1, 7.25.1, 7.28.2, and 7.28.3 of Power Safety Code 2021 and Chapter 12 of the Consumer Service Manual.*

10. ***WHEREAS,*** *according to the Investigation Report, it revealed that three (3) public accidents occurred due to electrocution, primarily caused by a lack of preventive maintenance in the cases of Ms. Fatima and Mr. Shahbaz (public). In the case of Mr. Ghulam Rasool (Shan) (public: private worker), the causes included unauthorized work by a LESCO employee, misidentification of the feeder, and failure to obtain a Permit to Work (PTW). Similarly, in the case of Mr. Liaqat Ali (public: private electrician), the contributing factors were unauthorized private electrician involvement by a LESCO employee, failure to obtain a PTW, failure to use personal protective equipment, inadequate portable earthing, and inadequate supervision. The Licensee has failed to adhere to statutory obligations, principles, and parameters established for prudent utility practices. Consequently, the Licensee is in violation of Section 21(2)(f) of the NEPRA Act, Article 19 of the Distribution License read with Rule 4(g) of the NEPRA Performance Standards (Distribution) Rules, 2005, DDC 4 of the Distribution Code, Clause SR 4 of Safety Management Criteria and PR 1 of Protection System Requirements of Distribution Code, Clauses 7.12.5, 7.15.1, 7.15.2, 7.15.5, 7.20.1, 7.20.4, 7.22.1, 7.25.1, and 7.28.2 of Power Safety Code 2021 and Chapter 12 of the Consumer Service Manual.*

11. ***WHEREAS,*** *according to the Investigation Report, it revealed that an accident of contractor worker occurred due to pole collapse, primarily caused by a lack of planning, lack of inspection, and inadequate supervision, which resulted in the fatality of Mr. Muhammad Afzaal (Contractor Worker). The Licensee*

has failed to adhere to statutory obligations, principles, and parameters established for prudent utility practices. Consequently, the Licensee is in violation of Section 21(2)(f) of the NEPRA Act, Article 19 of the Distribution License read with Rule 4(g) of the NEPRA Performance Standards (Distribution) Rules, 2005, DDC 4 of the Distribution Code, Clause SR 4 of Safety Management Criteria and PR 1 of Protection System Requirements of Distribution Code, Clauses 7.12.5, 7.15.1, 7.15.2, 7.15.5, 7.20.1, 7.20.4, 7.22.1, 7.25.1, 7.28.2, and 7.28.3 of Power Safety Code 2021 and Chapter 12 of the Consumer Service Manual.

5. **Response by Licensee**

5.1. The Licensee, vide letter No. OD/23336-39 dated May 5, 2025, submitted its response to the NEPRA Show Cause Notice. The key highlights of the Licensee's response are summarized below:

- *In examining the unfortunate series of accidents that transpired during the FY 2023-24 within LESCO, it becomes evident that each incident was the* ***result of individual actions and human behavior.*** *In order to bring fatal accidents to zero, first there is a dire need to analyze the root causes of such accidents. We approach this analysis with a commitment to transparency and a genuine desire to ensure the safety of both our valued employees and the public we serve. It is essential to recognize that while we have* ***robust safety protocols, SOPs and rigorous training programs in place, the root causes of these accidents often trace back to the choices and actions of individuals.*** *By delving into each case, we aim to shed light on the critical role of personal responsibility and behavior in preventing such occurrences in the future. LESCO remains steadfast in its dedication to enhancing safety standards and fostering a culture of individual accountability.*

Analysis of Fatalities of Employees:

In the FY 2023-24, a total of 8 fatal accidents of employees were reported at LESCO as mentioned in investigation report. These incidents have highlighted the critical necessity of addressing individual employee behavior. The majority of these accidents were attributed to employee actions such as working without authorization, ***they started working without informing their supervisors on their own discretion.*** *This collective negligence resulted in 5 out of 8 accidents,* ***indicating a pressing need to enforce safety protocols at individual-level.*** *The following table shows the breakdown of accidents and resultant cause:*

- ***Muhammad Kashif (Crane Driver)***

  Root Cause: *Unauthorized work without Permit to Work (PTW); crane boom made contact with live 11 kV jumper.*

  Nature: *Lack of coordination and PTW SOP violation, despite of having rigorous system in place for PTW.*

- ***Muhammad Ali (Line Man-I)***

  Root Cause: *Unauthorized work without PTW or proper earthing; feedback current from live system.*

  Nature: *Individual decision-making without proper authorization, despite of having rigorous system in place for PTW.*

- ***Muhammad Naeem Toor*** *(Line Man-I)*

Root Cause: *Working without PTW or system earthing.*

Nature: PTW SOP violation for working on H-pole.

- ***Muhammad Yousaf (Line Man-II)***

Root Cause: *Working in Unsafe conditions.*

Nature: *Structure failure of pole and lack of pre-check of physical condition of pole.*

- ***Abdul Shakoor (Line Man-I)***

Root Cause: *Unauthorized working for personal benefits and without PTW on his own discretion.*

Nature: *Working without PTW and earthing.*

- ***Muhammad Ashfaq (Meter Reader)***

Root Cause: *He was meter reader and was unauthorized to work without the absence of line staff.*

Nature: *Slipped while climbing to a roof via bamboo ladder, though, the substantial number of fiber ladders were available in PPE inventory of subdivision.*

- ***Umar Draz (Assistant Line Man)***

Root Cause: *Attempted to remove D-fuse with bare hands; no PTW, PPE, or earthing.*

Nature: *Severe violation of fundamental safety protocols and absolute sheer negligence, unauthorized to work on line, lack of supervision.*

- ***Masood Maqbool (Line Man-II)***

Root Cause: *Acted without informing supervisor, without PTW, PPE, or earthing; electrocution on energized LT side.*

Nature: *Independent, unauthorized work without formal process.*

Key Patterns:

- ***6 out of 8*** *accidents involved violations of Permit to Work (PTW) SOP and lack of earthing, despite of having rigorous system/ SOPs of PTW and earthing in place.*
- ***5 out of 8*** *accidents show individuals taking initiative without informing supervisors, on their own discretions.*
- *1 out of 8 accidents shows that the meter reader was unauthorized to climb up the roof in the absence of line staff/ trained personnel and he used wrong PPE despite the availability of tiber ladder.*
- *One case (Mr. M. Yousaf) directly linked to infrastructure failure - indicates the failure of supervisory staff and proper job briefing.*

Table 01 sums up the root-cause analysis (RCA) of all accidents. The details of all accidents have already been conveyed to NEPRA through proper channel. Here just breakdown of each accident is shown in context of the main reason behind each accident.

Sr. No.	Cause of Accident (Employees)	2023-24 (Total No. of Employees Accident = 8)		
		No. of Accident	%age	SOP

1	Working without PTW	6	75%	No work without PTW
2	Working without Proper Authorization/On One's Own Discretion	5	62.5%	Work under proper supervision
3	Working under Unsafe Conditions	1	12.5%	Assessment of all Hazards before work.
4	Failure of Equipment/T&P	1	12.5%	Usage of proper T&P/PPE

The breakdown of root causes for the eight fatal accidents involving LESCO employees during FY 2023-24 reveals a clear pattern where individual actions and mistakes played a pivotal role. This is in no way indicates that there is no SOP or necessary system in place for working. The fact that six accidents occurred due to working without PTW and in haste, five accidents transpired as a result of employees working without proper authorization or exercising their own discretion, and one incident was the direct outcome of gross unsafe acts committed by individuals, such as using wooden/ bamboo ladder despite of availability of the fiber ladder, underscores the critical importance of personal responsibility and behavior.

Furthermore, only one accident was attributed to structure/pole failure, which is unpredictable. This analysis unequivocally highlights that the majority of ***these accidents were preventable and stemmed from the decisions and actions of individuals rather than systemic or operational deficiencies.*** *LESCO remains resolute in its commitment to address these root causes through enhanced training, stricter adherence to safety protocols, and fostering a culture of individual accountability to ensure such tragic incidents are averted in the future.*

Analysis of Fatalities of Public:

The analysis of the four unfortunate incidents involving public individuals during FY 2023-24 in LESCO reveals a common thread - each of these accidents was primarily caused by individual actions and decisions, rather than systemic or operational failures within the LESCO.

- ***Public Accident on 01.07.2023 (Victims:*** *Mr. Shahbaz & Ms. Fatima):*

  A conductor broke and fell onto a passing motorcycle, resulting in fatalities.

  Conductor failure *is indeed a technical issue; however, sudden mechanical failure due to external factors cannot be ruled out without a detailed forensic analysis.*

  Infrastructure degradation *can happen unpredictably despite maintenance routines, especially in congested urban environments.*

  Conclusion: *While LESCO is responsible for infrastructure upkeep, instantaneous mechanical failures without prior visible symptoms are difficult to prevent fully, even with regular inspections.*

- ***Public Accident on 07.12.2023 (Victim:*** *Ghulam Rasool)*

  Incident: *While erecting a PC spun pole using a tri-pod and chain pulley, the equipment touched the energized 11 kV line, causing electrocution.*

  The deceased was hired privately by the owner of a housing society ("Gold Villas") - not by LESCO.

  No authorized LESCO supervision or work permit was issued for this activity.

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Unauthorized private work *near live lines without informing or coordinating with the utility is a violation of mandatory safety regulations.*

Conclusion: *LESCO cannot be held responsible for third-party activities executed without its knowledge, supervision, or permission.*

- ***Public Accident on 16.04.2024 (Victim:*** *Mr. Liaqat Ali)*

  Victim was climbing a pole unauthorized and touched the live 11 kV line, leading to fatal electrocution.

  Unauthorized climbing of electrical infrastructure by public individuals is a clear breach of public safety norms.

  LESCO has no operational mechanism to monitor or prevent unauthorized individual activities on its infrastructure continuously.

  Conclusion: *The fatality resulted from personal negligence and violation of safety norms by the victim, without any formal involvement of LESCO.*

- ***Public Accident on 17.01.2024 (Victim:*** *Mr. Muhammad Afzaal)*

  A private contractor's worker died when a PC pole collapsed during re-conducting work.

  The deceased was working under a ***private contractor*** *— not a direct LESCO employee.*

  Responsibility for worksite safety during such contractual jobs typically rests with the contractor, who must ensure structural assessments and safe practices.

  LESCO would only have liability if it failed to provide a safe working environment or supervise; but without direct control of the laborer, primary responsibility shifts to the contractor.

  Conclusion: This was a contractor's failure to assess structural integrity or to ensure proper scaffolding/ support, not a direct lapse on part of LESCO.

Key Points:

- *Two incidents involve private work without LESCO's authorization or supervision.*
- *One incident involves unauthorized access by a member of the public.*
- *Only one incident partially relates to possible infrastructure issues, and even then, immediate mechanical failure can occur despite preventive measures.*
- *Therefore, LESCO cannot be solely or primarily held responsible for three out of four incidents.*

In conclusion, a generic analysis of these accidents underscores that LESCO's distribution network and operational systems were not the primary causes of these incidents. Instead, ***these tragic accidents were a direct result of individual actions, decisions, and behaviors.*** *It underscores the importance of personal responsibility, safety awareness, and adherence to established safety protocols, which are essential elements in preventing such accidents in the future.*

Reaffirming NEPRA's Acknowledgment of LESCO's HSE Excellence

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It is important to respectfully highlight that LESCO's commitment to health, safety, and environmental standards has not only been self-declared but also formally recognized by NEPRA through its Annual HSE Performance Evaluation for the year 2023, wherein LESCO was awarded ***81 points out of a total of 100*** *— placing us in the* ***"Outstanding" category.***

This exceptional rating, as per NEPRA's own criteria, is a testament to the presence of a comprehensive, well-structured, and effectively implemented HSE Management System at LESCO. The evaluation covered critical areas such as:

- *Implementation of the Power Safety Code;*
- *Incident reporting and investigation procedures;*
- *Hazard identification and risk assessments;*
- *Permit to Work systems and job-specific trainings;*
- *Emergency response drills and PPE protocols;*
- *Corrective and preventive maintenance processes;*
- *Internal audits and top management HSE oversight.*

Such a rating cannot be achieved without demonstrable evidence of not only having the right systems in place but also actively maintaining and continually improving them, as per NEPRA's own evaluation rubrics.

In this context, we wish to respectfully underscore the apparent contradiction between the recognition of LESCO's structured and proactive HSE framework through the "Outstanding" performance rating, and the simultaneous issuance of a show cause notice focusing solely on the unfortunate fatalities, most of which-as evidenced and explained-stemmed from ***individual behavioral lapses****, rather than systemic or procedural failings.*

This is not to diminish the gravity of any life lost-each incident is tragic and a serious concern for LESCO. However, we respectfully seek a balanced perspective that considers:

- *The robust systems and proactive safety culture already in place (as validated by NEPRA itself),*
- *The non-systemic, human-behavior-driven nature of most of the fatal incidents, and*
- *The extensive corrective actions and behavioral training initiatives we have adopted post-incident.*

We believe that regulatory feedback and letters of explanation should be contextualized within the broader performance of the organization. In light of LESCO's proven and independently evaluated HSE strength, we respectfully request that future assessments and inquiries consider both ***outcome-based incidents*** *and* ***process-based excellence*** *together, for a more balanced evaluation of licensee performance.*

Understanding the Inherent Risks in Electrical Power Distribution: A Global Perspective

Globally, the electrical power distribution sector is recognized as one of the most inherently hazardous industries. Whether in developed countries like the United States and Australia, or in emerging economies such as India, the nature of work in this sector-particularly in overhead networks-exposes workers to extreme occupational hazards that are difficult to eliminate completely, despite stringent regulations, training, and systemic safety frameworks.

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Historical Data from the Developed Countries

According to the U.S. Bureau of Labor Statistics (BLS), the fatal injury rate for electrical power-line installers and repairers consistently ranks among the highest of all occupations. In 2022 alone, the occupation recorded a fatal injury rate of over 20 deaths per 100,000 full-time equivalent workers-substantially higher than the national average across all industries, which stands at around 3.7 per 100,000. Most of these fatalities were caused by electrocutions, falls from heights, and contact with energized equipment during maintenance of overhead lines.

Similarly, in Australia, Safe Work Australia reports that electrical distribution workers, particularly those engaged in overhead line work, fall into one of the highest risk categories for serious injury and fatality. Between 2015 and 2020, the electrical supply sector had a worker fatality rate that was up to three times the national average. Overhead line workers were found to be particularly vulnerable due to working at height, exposure to potentially live wires, and environmental unpredictability (e.g. infrastructure degradation).

In India, the Central Electricity Authority (CEA) regularly publishes safety performance reports that reveal a consistently high number of fatal accidents among power distribution personnel. Despite extensive policy frameworks and safety rules, dozens of fatalities are recorded each year, especially in distribution utilities managing vast and aging overhead networks across rural and urban landscapes.

The Overhead Network Challenge

Unlike underground cable systems that are shielded from direct human contact, overhead power distribution inherently exposes both employees and the public to open-air high voltage infrastructure. This makes tasks like line repair, maintenance, and even routine inspections significantly riskier. Factors such as conductor sag, inadequate clearance, environmental interference, and unauthorized public access compound the hazards.

Moreover, workers are often required to operate on poles and elevated structures-sometimes in adverse weather conditions-where slips, equipment failure, or miscommunication can result in fatal outcomes even with safety protocols in place.

While "Zero Harm" or "Zero Accidents" remains the aspirational goal of all modern Health, Safety & Environment (HSE) programs, global evidence suggests that it is an idealistic vision rather than a consistently achievable target— especially in sectors with high inherent risk, like power distribution. As recognized by international safety organizations such as the National Safety Council (U.S.) and IOSH (U.K.), even the most mature safety systems cannot entirely eliminate human error, unpredictable environmental conditions, or equipment failure.

The goal for zero fatalities is vital to keep organizations motivated, but regulatory bodies and utilities worldwide increasingly emphasize a towards zero harm or "as low as reasonably practicable (ALARP)" approach, which recognizes that while accidents can be drastically reduced, they may not be fully eradicated due to the complex, dynamic, and high-risk nature of certain jobs.

In conclusions, LESCO want to highlight few points in its defense that showcase our commitment to strictly adhere all the rules and regulations devised by NEPRA

1. *It is evident that the common cause behind all these accidents is the behavior and actions of individuals involved. These* ***incidents were primarily triggered by decisions made at an individual level****, rather than systemic or operational failures within LESCO. Therefore, in accordance with rule 4(g) of Performance Standards (Distributions)*

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Rules, 2005 and clause SR-4 of Distribution Code, 2005, the distribution facilities under LESCO are constructed, operated, controlled and maintained in a manner consistent with the Distribution Code, Power Safety Code, Consumer Service Manual, Performance Standards (Distribution) and other applicable documents.

2. *In the context of the accidents mentioned, it is crucial to note that there was no involvement of leakage current, step potential or breakdown of conductors in any of these incidents. These accidents primarily resulted from* ***individual behavior and actions****, as previously discussed. The absence of leakage current or equipment breakdown in these cases underscores that the accidents were not linked to LESCO's distribution facilities causing harm beyond acceptable limits, as specified in the relevant IEEE/IEC Standards. Instead, these incidents serve as reminders of the importance of individual responsibility and adherence to safety guidelines. LESCO remains committed to preventing accidents and upholding NEPRA's standards in this regard.*
3. *These accidents underscore the paramount importance of individual responsibility and adherence to safety guidelines. LESCO has implemented suitable rules, regulations, and training programs to ensure our staff and the public understand and follow safety procedures.*
4. *Importantly, these accidents are not indicative of any systemic or operational failures within LESCO's distribution network. Instead, they highlight the need for individuals to act responsibly and follow safety protocols rigorously.*

In view of the above, LESCO respectfully request NEPRA to consider our commitment, progress, and the challenges LESCO face in achieving the goal of zero accidents. LESCO assure you that we are working tirelessly to address these matters promptly and effectively. Therefore, LESCO is request the NEPRA authority that considering our efforts in implementing the establishing principle of HSE in LESCO, exonerate LESCO from all the charges raised in this notice.

6. **Hearing:**

6.1. The Authority considered the response of the Licensee and decided to provide an opportunity for a hearing to the Licensee under Regulation 4(11) of the NEPRA (Fine) Regulations, 2021. Accordingly, hearing notice No. NEPRA/R/DG(M&E)/LAD-05/0980 was issued to Licensee on July 17, 2025 and hearing was held on July 24, 2025. During the hearing, the CEO of Licensee, along with his team made the following submissions:

6.2. Licensee is adhering to all NEPRA Guidelines and investigates all accidents on merit, based on facts. LESCO established SOPs and regularly conduct Safety Seminars. All employee-related accidents occurred outside of duty hours, resulting from their own personal decisions.

6.3. In the case of the public accident, the 11 kV undersized "Gopher" conductor had been in service for a long time. On the day of the incident, LESCO stated that a **windstorm** caused this conductor to break and fall on the victims.

6.4. During the hearing, NEPRA informed LESCO to submit any additional comments within a week, pertaining to the accidents or their root causes, if any. LESCO submitted below comments under bearing No. 23997-24000, dated July 31, 2025:

In continuation of the referenced hearing and in accordance with the directions of the NEPRA Authority, LESCO is utilizing this opportunity granted by the Authority to submit its representation and prayer to NEPRA regarding the fatal accidents reported during FY 2023-24.

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LESCO deeply regrets the unfortunate loss of life and reiterates its full commitment to ensuring safety, accountability and continuous improvement across all levels of operation.

It is respectfully submitted that LESCO has established and implemented a comprehensive Safety Management System, in full alignment with NEPRA's Power Safety Code, Distribution Code, and Performance Standards. However, a detailed internal review and root cause analysis of the incidents reveal that the majority of these unfortunate events were caused by individual-behavioral lapses and unauthorized actions, rather than systemic or operational deficiencies.

- *A total of eight (08) employee fatalities occurred in FY 2023-24. Of these, six (06) of these resulted from violations of the Permit to Work (PTW) protocols, involving individuals working without informing supervisors or obtaining proper authorization-actions in direct violation of internal safety procedures.*
- *One (01) employee fatality was attributed to structural failure, representing an isolated technical issue, while another one (01) was caused by working under unsafe conditions.*
- *Among public-related fatalities, three (03) out of four (04) incidents resulted from unauthorized third-party activity or public interference, without any formal involvement or supervision by LESCO.*

These incidents collectively highlight the pressing challenge of managing human factor risks, which persist even in the presence of robust safety protocols.

In response to the above, LESCO has promptly taken the following measures:

- *Reinforced PTW compliance through re-briefing sessions across all operational staff.*
- *Conducted behavior-based safety training programs to instill a culture of personal responsibility. In this regard, the Customer Services Committee of LESCO's Board of Directors directed the HSE Directorate to engage with professional consultants for improving behavioral safety awareness.*
- *In compliance, LESCO partnered with renowned institutions including MANSOL Hab (an IOSH & NEBOSH-certified institute), to train line staff and supervisors. The first batch of 45 participants underwent training on Behavioral Safety, Electrical Safety, and Work at Height at the Regional Training Center.*

  Furthermore, these trainings are being rolled out at each Circle level, including sessions for Circle CTC instructors.
- *Additionally, five (05) batches (covering 157 participants) of training sessions were conducted for LESCO top management, officers, and field staff in collaboration with the Asian Development Bank (ADB) and OSH expert Ms. Afshan Saeed, between March and June 2025.*
- *Introduced stricter internal controls for the initiation and documentation of field activities.*
- *Issued new directives to prohibit unauthorized third-party work near energized systems and enforce coordination protocols more effectively.*

In view of:

- *The individual behavioral nature of the reported incidents rather than systemic failure,*

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- *The preventive systems and SOPs already in place, **(M&E HSE Comments:** Not implemented nor enforced)*
- *The timely corrective actions taken post-incident, and*
- *LESCO's unwavering commitment to compliance and safety,*

It is humbly requested that NEPRA may consider the above submissions and kindly waive the show cause notice issued under the referred letter. LESCO seeks exoneration from the charges, while reaffirming its full cooperation and dedication to enhancing public and occupational safety across its distribution network.

7. **Findings/Analysis:**

In light of LESCO's response to the Show Cause Notice and submission of comments after hearing, following are the findings:

7.1. In its response to the show-cause notice, during hearing and submitted comments, LESCO attributed each accident to individual actions, reflecting that all LESCO employees appear to be working in an individual capacity without administrative control, teamwork, or supervision from LESCO management. LESCO, attempted to shift all blame towards the victims, holding them responsible for the accidents, despite the fact that all these employees were working under LESCO's operational command.

7.2. LESCO has not contested or challenged any specific root cause of any accident as identified in the NEPRA Investigation Report.

7.3. The overall findings revealed that LESCO significantly failed to effectively promote, implement and enforce a strong safety system in the company. In addition, line management also failed in their duties and responsibilities to enforce basic electrical safety, address poor attitudes and correct unsafe behaviors among staff who engaged in unauthorized off-duty work on dangerous electrical systems without proper PTW and PPE.

7.4. Despite NEPRA's safety initiatives in 2022, including the issuance of the "Line Staff Safety Handbook" and the "Work Permit Form" in Urdu, LESCO's leadership failed to implement or enforce these safety measures, leading to repeated fatalities.

7.5. LESCO's submission in response to the Show Cause Notice (SCN) is entirely devoid of merit, factually incorrect, and represents a clear attempt to **shift accountability onto individual workers under the Licensee's operational command,** rather than acknowledging the systemic and managerial failures that led to these preventable accidents. In LESCO's response, each incident was the result of individual actions, reflecting everyone working individually/independently, with no management, supervision, or teamwork in place. Fatalities caused by recurring unsafe practices establish the Licensee's subsequent failures.

7.6. **Failure of Duty of Care.**

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LESCO's repeated assertion that individual actions alone caused these fatal incidents is a blatant abdication of its legal and managerial responsibilities. The Licensee's primary obligation under Section 21(2)(f) of the NEPRA Act and Article 19 of the Distribution License is to follow the performance standards laid down by the Authority for distribution and transmission of electric power, including safety, health and environmental protection instructions that a robust system of planning, supervision, and enforcement of safety procedures is implemented and maintained, obligations which the investigation clearly established were systematically and chronically violated.

7.7. **LESCO Management Deficiencies**

Evidence shows that eight employee fatalities occurred due to lack of planning, inadequate supervision, absence of work permits, and disregard for basic personal protective equipment requirements, directly implicate line management, and the highest executive offices of LESCO. The repeated nature of these violations across multiple incidents demonstrates gross negligence and willful disregard of NEPRA's Performance Standards and Power Safety Code obligations.

The LESCO's claim that "rigorous SOPs and PTW systems" existed but were individually ignored is not a valid defense in law or safety management. A fundamental element of an effective HSE Management System as required under Clauses 7.15.1, 7.15.2, 7.15.5, 7.20.1, 7.20.4, 7.22.1, 7.25.1, 7.28.2, and 7.28.3 of the Power Safety Code, is that management must enforce SOPs, monitor compliance, and correct unsafe behaviors proactively. LESCO's failure to detect, intervene, and correct repeated SOP violations before they resulted in fatalities is clear evidence of systemic failure.

7.8. **Invalidity of Quoting NEPRA HSE Performance Ratings**

The Licensee's reference to a previous HSE performance rating of "Outstanding" is irrelevant to the determination of liability in these specific fatal incidents. NEPRA's rating in HSE performance was based on submitted documents and does not override the statutory obligation to protect life through consistent, effective field implementation. Moreover, LESCO's HSE performance declined during the last fiscal year 2023-24, further weakening its defense.

7.9. **Misleading Global Comparisons**

LESCO's attempt to dilute accountability by citing fatality rates in developed countries is misleading and factually irrelevant. The Investigation Committee's mandate is to assess compliance with the specific statutory, licensing, and safety code obligations applicable under Pakistani law and NEPRA regulations, not to excuse failures by comparing them to international statistics.

7.10. In the case of the public accident, as LESCO stated that the 11 kV undersized "Gopher" conductor had been in service for a long time. On the day of the incident, LESCO stated that a windstorm caused this conductor to break and fall on the victims. However, only one span of undersized conductor fell; all other 11 kV conductors of appropriate size remained intact. Furthermore, on the date of the accident, July 1, 2023, at 02:57 AM, the recorded wind speed was normal at 12 km/h, whereas abnormal wind speeds are considered to be above 32 km/h. Below is the weather report).

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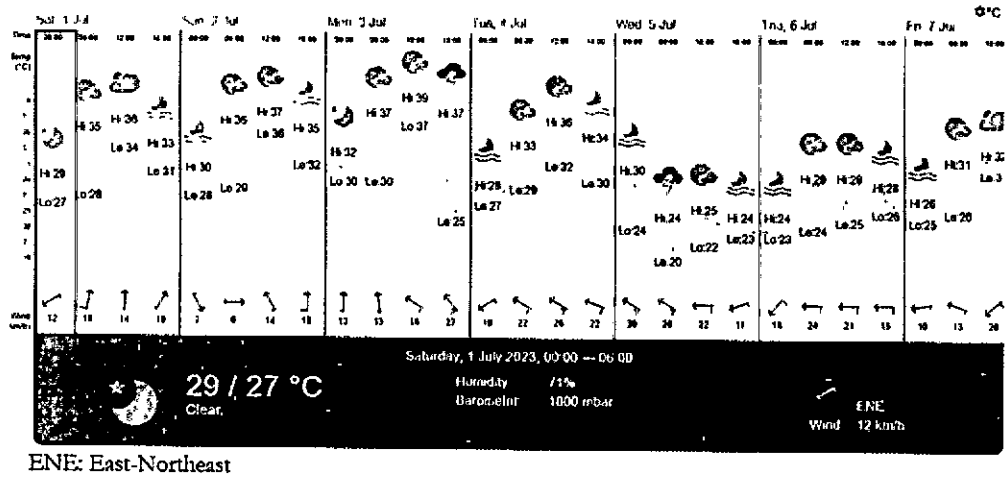
July 2023 Weather In Lahore — Graph



ENE: East-Northeast

8. **Legal Violations/ Non-Compliance Confirmed**

The NEPRA Act and the distribution license issued to the Distribution Company impose a statutory obligation on the company to follow the safety standards laid down by the Authority in the NEPRA Performance Standards (Distribution) Rules, Distribution Code, Power Safety Code 2021, and Consumer Service Manual. The investigation unequivocally confirms the following violations and non-compliances by the Distribution Company:

8.1. **NEPRA Act, Section 21(2)f**

The Licensee shall follow the performance standards laid down by the Authority for distribution and transmission of electric power, including safety, health and environmental protection instructions issued by the Authority or any Governmental agency;

8.2. **Distribution License, Article 19 - Compliance with Health, Safety and Environmental Standards**

The Licensee shall follow the standards laid down by the Authority for distribution and transmission of electric power, including health, safety, and environmental protection in accordance with the Power Safety Code and such other instructions as may be issued by any Federal or Provincial Agency.

8.3. **NEPRA Performance Standards (Distribution) Rules**

Rule 4(g), Overall Standards 7-(Safety (OS7):

(i) All distribution facilities of a distribution company shall be constructed, operated, controlled and remained in a manner consistent with the applicable documents.

(ii) 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.

(iii) A distribution company shall implement suitable, necessary, and appropriate rules, regulations and working practices, as outlined in its Distribution Code or applicable documents, to ensure the safety of its staff and members of the public. This

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shall also include suitable training for familiarity and understanding of the rules, regulations, practices, and training to use any special equipment that may be required for such purposes including without limitation basic first aid training.

(iv) .....

8.4. **Distribution Code**

8.4.1. DDC 2.2 Distribution Design Code

Design Criteria for Distribution Lines These criteria shall apply to all distribution and sub-transmission lines and to be operated and maintained by the Licensee up to and including 132kV for both overhead lines and underground cables. The lines shall be designed and constructed in accordance with relevant provisions of IEC Standard or subsequent approved standards applicable to overhead lines and under-ground cables.

8.4.2. DDC 3 Design Principles

3.1 Specification of Equipment, Overhead Lines and Underground Cables

a. *The principles of design, manufacturing, testing and installation of Distribution Equipment, overhead lines and underground cables, including quality requirements, shall conform to applicable standards such as IEC, IEEE, Pakistan Standards or approved current practices of the Licensee.*

b. *The specifications of Equipment, overhead lines and cables shall be such as to permit the Operation of the Licensee Distribution System in the following manner;*

i. *within the safety limits as included in the approved Safety Code of the Licensee or the relevant provisions of the Performance Standards (Distribution);*

8.4.3. DDC 4, Design Code- Earthing

.....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.

8.4.4. SR 4, Safety Management Criteria

a. *All distribution facilities of a distribution company shall be constructed, operated, controlled and remained in a manner consistent with the applicable documents.*

b. *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.*

c. *A distribution company shall implement suitable, necessary, and appropriate rules, regulations and working practices, as outlined in its Distribution Code or applicable documents, to ensure the safety of its staff and members of the public. This shall also include suitable training for familiarity and understanding of the rules, regulations, practices, and training to use any special equipment that may be required for such purposes including without limitation basic first aid training.*

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8.4.5. SC 1, System Construction Code

Each Licensee shall prepare a comprehensive and exhaustive Operating / Construction manual in accordance with DISCOs/KESC approved standard based on relevant international standards like IEC, IEEE, and ASI, Consumer Service Manual, Grid Code and Distribution Code dealing with all material aspects to the design specifications, safe constructing practices, and sound engineering technical principles for construction of Distribution System and connections to consumer installation/system. In particular due regard shall be had for the following but not limited to: -

a. *Standard clearance of all voltage lines upto 132kV (vertical as well horizontal) from grounds, buildings, from each other, railway crossing, road crossing etc.*

b. *Maximum and minimum length of span of the lines of all the voltages upto 132kV at different locations and different areas.*

8.4.6. PR 1 Protection System Practices and System Co-ordination

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:

a. *Protection co-ordination of distribution system, sub-transmission system and system upto the metering point of the User (wherever applicable).*

b. *Intentions to protect the Licensees lines, sub-station facility and equipment against the effects of faults.*

.....

h. *Provide protective earthing devices.*

8.5. **Power Safety Code 2021**

7.12.5. The licensee shall provide adequate training and supervision to ensure all employees and contractors understand the required steps as defined in the SOP/ work instructions and perform their work accordingly.

7.15.1. All critical high risk activities including ....., transformer, overhead lines, ... dead apparatus/lines, working at height, ... shall be performed safely in compliance to Licensee Operation/ Maintenance Procedure, SOP, or Manufacturer's manual.

7.15.2. Licensee shall implement all necessary precautions to avoid any leakage of electrical current or hazardous energy from its system/ infrastructure to harm human life.

7.15.5. Licensee shall ensure effective coverage of critical high-risk activities under close and direct supervision to reduce incidents/ near misses.

7.20.1. Personal Protective Equipment (PPE)/ Tools & Plants (T&P) shall be in accordance to Hazard/ Risk Category and/or PPE/T&P Assessment study to provide protection from hazardous conditions.

7.20.4. Identify task specific PPE/ T&P in Task Risk Assessment/ JSA/ Permit to Work.

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7.22.1. Only electrically experienced, trained and authorized employees/ contractors shall perform electrical work against approved "Permit to Work" under the continuous direction and supervision of the job in-charge.

7.25.1. Licensee shall apply Permit to Work System and the work shall be carried out only when there is a valid permit to work issued for corrective and preventive maintenance activities, etc.

7.28.2. All poles, towers and structure shall be carefully inspected before climbing to assure that they are in a safe condition for the work to be performed and that they are capable of sustaining the additional or unbalanced stresses to which they will be subjected. The types of abnormalities that should be checked are cracks, damages, and deteriorations in poles, towers and structure and its foundation.

7.28.3. If poles, towers and structure are unsafe for climbing, they shall not be climbed until made safe by guying, bracing or use mobile elevated aerial platform, man-baskets, man-lift or bucket mounted vehicle instead of ladder.

8.6. **Consumer Service Manual**

Chapter 12 Safety and Security

12.2 Obligation of DISCO

DISCO shall monitor and implement the safety and security plan for consumers. The safety and security objectives can be achieved by adopting good engineering practice, including measures as described below:

.....

12.2.1 Operation and maintenance of DISCO distribution system /Network shall be carried out only by the DISCO authorized and trained personnel.

12.2.2 DISCO system equipment, including overhead lines, poles/ structures/ towers underground cables, transformers, panels, cutouts, meters, service drops, etc. shall be installed and maintained in accordance with Grid Code, Distribution Code and other relevant documents.

.....

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.

12.2.6 DISCO will issue a notice to the Consumer(s)/ Person(s), in case of illegal construction, extension of building under or near the distribution/ transmission lines for violation of safety standards.

12.4 Some Useful Safety Tips

12.4.6 Safe clearances from electricity conductors and equipment (e.g., hazardous extension of balconies at the upper stories of houses in mohallas which comes within close proximity of electric lines) must be maintained to avoid electrocution.

9. **Authority Decision**

9.1. Based on the investigation report and the foregoing analysis and findings, it is concluded that LESCO has failed to submit a satisfactory response or solid factual evidence to the Show Cause Notice and is, therefore, concludes that LESCO is in violation of the NEPRA Act, Distribution License, Performance

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Standards (Distribution) Rules 2005, Distribution Code, Power Safety Code 2021, and Consumer Service Manual.

9.2. The investigation establishes beyond doubt that:

- There was a consistent failure at every level of line management and a complete absence of effective safety culture enforcement from LESCO's top leadership downwards.
- The fatalities were entirely preventable, if LESCO's line management had properly planned the job, obtained the necessary permits to work, ensured effective supervision, conducted adequate preventive maintenance, and enforced the use of PPE. In this case, there were 100% chances of saving victims' lives.
- The Licensee failed to submit any credible evidence to contradict the investigation's findings or demonstrate reasonable efforts to prevent these deaths.

9.3. In light of the investigation findings, the evidence available on record, and LESCO's failure to provide any solid factual evidence or legal defense in response to the Show Cause Notice, the Authority hereby rejects the Licensee's reply to the Show Cause Notice bearing No. NEPRA/DG(M&E)/LAD-05/3775 dated March 12, 2025. Consequently, the Authority imposes a fine of Rupees Thirty Million (Rs. 30,000,000) on the Licensee under Section 27C(B) of the NEPRA Act, the NEPRA (Fine) Regulations, 2021, for non-compliance with the NEPRA Act, Terms & Conditions of the License, Performance Standards (Distribution) Rules, 2005, Distribution Code, Power Safety Code 2021, Consumer Service Manual, and other applicable regulatory documents.

9.4. The Authority hereby directs the Licensee to give compensation to the following victims' families (next of kin) to reduce the financial constraints on the bereaved family in accordance with the Licensee's Compensation Policy/Safety Manual, based on the identified findings and the negligence of line management who failed to fulfill their duties and responsibilities to protect contractor worker and public. Submit a compliance report to NEPRA within sixty (60) working days.

9.4.1. Victim Names: Ms. Fatima and Mr. Shahbaz (Public) Accident Date: July 01, 2023

9.4.2. Victim Names: Mr. Ghulam Rasool (Shan) (Public) Accident Date: Dec 07, 2023

9.4.3. Victim Names: Mr. Muhammad Afzaal (Contractor Worker) Accident Date: Jan 17, 2024

9.4.4. Victim Names: Mr. Liaqat Ali (Public: Private Electrician) Accident Date: Apr 16, 2024

9.5. Furthermore, LESCO shall also be directed, under Section 27C(c) of the NEPRA Act, to implement the technical corrective and preventive measures communicated vide letter No. NEPRA/DG(M&E)/LAD-05/3773 dated March 12, 2025 to rectify the LESCO identified deficiencies, ensuring the safety of the public, employees, contractors, and facilities.

9.6. The Licensee is hereby directed to deposit the fine amount of Rupees Thirty Million (Rs. 30,000,000) in the designated bank account of the NEPRA within fifteen (15) days from the date of issuance of this Order. A copy of the paid instrument shall be submitted to the Registrar's Office for record and verification. Failure to comply with this directive within the stipulated period shall render the Licensee

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liable for recovery of the outstanding amount under Section 41 of the NEPRA Act, as arrears of land revenue, or through any other lawful means deemed appropriate by the Authority. Furthermore, the Authority reserves the right to initiate additional legal or regulatory proceedings against the Licensee for non-compliance with this Order.

Did not attend

Rafique Ahmed Shaikh
Member

Amina Ahmed
Member

Engr. Maqsood Anwar Khan
Member

Waseem Mukhtar
Chairman

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