



National Electric Power Regulatory Authority

NEPRA Tower

Attaturk Avenue (East) Sector G-5/1, Islamabad.

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**Consumer Affairs
Department**

TCD. 02/ 27/6 -2025
July 07, 2025

Managing Director,
National Transmission & Dispatch Company (NTDC),
Room No.414, WAPDA House,
Lahore.

Chief Executive Officer,
Islamabad Electric Supply Company (IESCO),
Street No 40, G-7/4,
Islamabad.

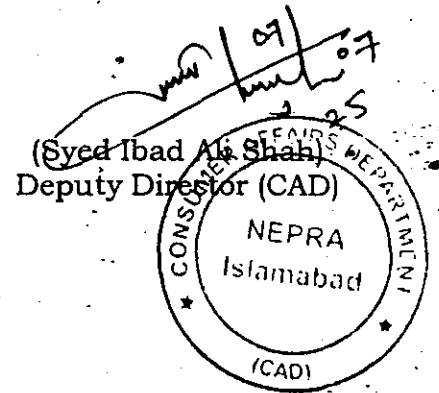
SUBJECT: DECISION IN THE MATTER OF COMPLAINT FILED BY ENGINEER MUHAMMAD SALEEM DEPUTY CHIEF EXECUTIVE BTPL UNDER SECTION 39 OF THE REGULATION OF GENERATION, TRANSMISSION AND DISTRIBUTION OF ELECTRIC POWER ACT, 1997 AGAINST IESCO/NTDCL REGARDING LOCATION OF METERING POINT & ENERGIZATION OF POWER TRANSFORMER
Complaint # IESCO-127/11/2021

Please find enclosed herewith the decision of NEPRA Complaints Resolution Committee dated July 07, 2025 regarding the subject matter for necessary action.

Encl: As above

Copy to:

1. C.E/Customer Services Director,
Islamabad Electric Supply Company (IESCO),
Street No 40, G-7/4, Islamabad.
2. Mr. Naeem Jan, CE(P&E),
Islamabad Electric Supply Company (IESCO),
Street No 40, G-7/4, Islamabad.
3. Pir Tariq Said, CE,
National Transmission & Dispatch Company (NTDC),
Room No.414, WAPDA House, Lahore.
4. Engr. Muhammad Saleem,
Deputy Chief Executive, Bahria Town Services,
Safari Valley Office, Safari Homes, Sector-E,
Phase-VIII, Bahria Town, Rawalpindi.





**BEFORE THE
NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (NEPRA)
Complaint No. IESCO-127/11/2021**

Engineer Muhammad Saleem
Deputy Chief Executive, Bahria Town Services
Safari Valley Office, Safari Homes, Sector E
Phase VIII, Bahria Town Rawalpindi.

..... **Complainant**

VERSUS

National Transmission & Dispatch Company Limited (NTDCL)
Room No. 414, WAPDA House, Lahore.
&
Islamabad Electric Supply Company (IESCO)
Street No. 40, G 7/4, Islamabad.

Respondent No.1

Respondent No.2

Date of Hearings:

November 29, 2021, February 01, 2023, February 13, 2023
May 31, 2023, January 15, 2024 & May 29, 2025

**On behalf of
Complainant:**

- 1) Engineer Muhammad Saleem Deputy CEO, BTPL
- 2) Mr. Azhar Mehmood GM (Grids), BTPL
- 3) Mr. Pervaiz Chaudhary CEO, ME Consult
- 4) Mr. Salahuddin MD, ME Consult

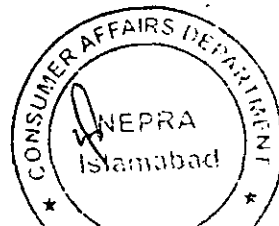
Respondents:

- | | |
|---|---|
| 1) Mr. Munawar Hussain Bhatti GM, NTDCL | 9) Mr. Sarmad Ahsan DM (B&R), NTDCL |
| 2) Dr. Khawaja Riffat Hussain GM, NTDCL | 10) Mr. Naveed Ayaz DM, NTDCL |
| 3) Pir Tariq Said CE, NTDCL | 11) Mr. Sharjeel Bhath DM, NTDCL |
| 4) Mr. Muhammad Shamas CE, NTDCL | 12) Mr. Rehan Sadiq DM (MSP), NTDCL |
| 5) Mst. Naila Manager, NTDCL | 13) Mr. Umer Ehsan DM (MSP), NTDCL |
| 6) Mr. Sohaib Babar Manager, NTDCL | 14) Mr. Naeem Jan CE (P&E), IESCO |
| 7) Mr. Hussnain Arshad Manager (CLO), NTDCL | 15) Mr. Saleem Abdullah Director, IESCO |
| 8) Mr. Imran Maqbool Manager (SSD), NTDCL | 16) Mr. Ghulam Qasim XEN, IESCO |
| | 17) Mr. Muhammad Waqas AD, IESCO |

Subject: DECISION IN THE MATTER OF COMPLAINT FILED BY ENGINEER MUHAMMAD SALEEM DEPUTY CHIEF EXECUTIVE BTPL UNDER SECTION 39 OF THE REGULATION OF GENERATION, TRANSMISSION AND DISTRIBUTION OF ELECTRIC POWER ACT, 1997 AGAINST IESCO/NTDCL REGARDING LOCATION OF METERING POINT & ENERGIZATION OF POWER TRANSFORMER

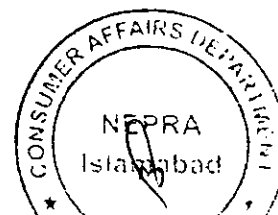
DECISION

This decision shall dispose of the complaint filed by Engineer Muhammad Saleem, Deputy Chief Executive Bahria Town Pvt. Ltd. (hereinafter referred to as the "Complainant" or "BTPL") against National Transmission & Dispatch Company Limited (hereinafter referred to as the "Respondent No. 01" or "NTDCL") & Islamabad Electric Supply Company (hereinafter referred to as the "Respondent No. 02" or "IESCO") under Section 39 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (hereinafter referred to as the "NEPRA Act").



2. NEPRA received a complaint from BTPL, wherein the Complainant raised the issue of energization of 2nd 63 MVA auto transformer and location of metering point between NTDC & BTPL at 220 kV Bahria Town Rawalpindi grid station. The Complainant further submitted as under:-

- i. Bahria Town Pvt. Ltd. (BTPL) had initially constructed 132 kV Grid Station for power supply connection after obtaining approval from NTDC.
- ii. Accordingly BTPL requested IESCO for construction of 132 kV Double Circuit Transmission Line feed for the aforesaid 132 kV grid station on cost deposit basis. However, during site survey, serious Right of Way (RoW) problems were noticed. The only possible option for supply of power to 132 kV BTPL grid station was through the NTDC 220 kV Rawat-ISPR TL passing nearby the aforesaid grid station.
- iii. BTPL was thus constrained to construct 220 kV grid station through its own resources after approval of NTDC.
- iv. All the electrical equipment and associated technical documents/drawings of 220/132 kV grid station having 1xAuto Transformer Bay were approved by CE Design NTDC during the year 2009. Construction of the grid station and its testing/energization was carried out during year 2011, under the supervision/witnessing by all the respective NTDC formations. Energy meters have been installed as per approved metering arrangements.
- v. For better reliability/security of power supply at 220 kV grid station and facilitate in the subsequent O&M of the equipment another 63 MVA auto transformer was installed and the same design philosophy/NTDC specifications have been followed for the 2nd Auto Transformer Bay and allied equipment which was approved by the NTDC Design Department. Site testing has also been carried out which has been duly witnessed by the NTDC's respective formations and aforesaid Auto Transformer Bay is ready for energization.
- vi. Upon completion of pre-commissioning tests for the 2nd Auto Transformer, BTPL had requested NTDC to allow its energization. However, NTDC has not allowed energization of the aforesaid Auto Transformer until the metering setups for the Auto Transformers are not shifted to 220 kV/HV side of the Auto Transformer.
- vii. BTPL metering setup for both the Auto Transformers have been installed on 132 kV/LV side of Auto Transformers in accordance with NEPRA Grid Code (PMC Clause 2.1b) after obtaining necessary approval of the 132 kV metering equipment and associated Design Drawings. Present Metering equipment/setup is also in line with all the existing 132 kV CDPs between NTDC and DISCOs.
- viii. All tariffs have built in mechanism to address issues like transformer losses, etc. In fact, in all the NTDC 220/132 kV grid stations, the metering arrangements are on 132 kV/LV side and all the DISCOs are being billed accordingly. Application of transformer loss compensation is an excessive/undue requirement, in contradiction to the prevailing billing practice between NTDC and DISCOs.
- ix. DISCOs/IESCO purchases power from CPPA on basket price whereas BTPL is being billed under C tariff. Further charging



BTPL in lieu of transformation losses compensation factor, will be unjustified and it will be a great injustice to BTPL and its residents.

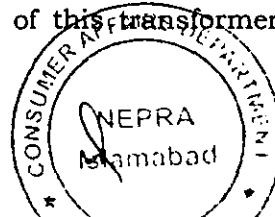
- x. In view the mentioned submission, BTPL requested an addition/amendment in the Grid Code regarding location of Metering Points and Transformation losses for its uniform application to all the DISCOs as well as Bulk Power Consumers.
- xi. Necessary instructions to NTDC may be issued for reconsidering its present stance and keep the metering setup on 132 kV/LV side of Auto Transformers, in line with metering setups between NTDC and all DISCOs as per NEPRA Grid Code.
- xii. Early energization of the 2nd Auto Transformer may be made in the best interest of network for provision of reliable/secure power supply to more than 115000 residents, since there is no other/alternate source of power supply, even to meet with the minimum required N-1 contingency criteria in case of fault/emergency tripping of the single transformer.

3. The subject matter was taken up with NTDCL and IESCO and a hearing was held on November 29, 2021 at NEPRA Head Office, Islamabad which was attended by all the parties wherein the matter was discussed in detail. NTDCL in its verbal/written arguments submitted that:

- i. BTPL's version regarding location of metering point at 132 kV LV side of the auto transformers was evaluated with due diligence in terms of all the available documentary evidence on the record and the issues raised by BTPL were discussed in detail during the standing committee meeting comprised of CPPAG & NTDCL officials held on September 21, 2021.
- ii. Location of metering point on transformer must be such that the cost of transformation losses shall always rest with the entity that owns the transformer as per the Grid Code and the same practice is done regarding declaration of CDPs between NTDC and DISCOs whereby the cost of transformation losses is being borne by NTDC. Energization of second 63 MVA auto transformer is subject to shifting of metering equipment on HV side of both the transformer along with payment of transformation losses compensation incurred to NTDC since the energization of the first transformer.
- iii. Approval regarding drawings were granted to BTPL subject to a condition that meter installed on LV side of 220/132 kV transformer should be with provision of transformation loss compensation of first 63 MVA transformer and the same has not been reimbursed by BTPL since establishment of 220/132 kV grid station i.e. December, 2008.

4. The matter was analyzed in detail and in the best interest of general public/residents of BTPL, though an interim decision dated December 10, 2021, NTDCL and IESCO were directed to energize second 63 MVA auto transformer of BTPL and obtain an undertaking from BTPL to the effect that BTPL will abide by the decision of NEPRA regarding dispute over the location of metering installation. In response, NTDCL vide letter dated April 20, 2022 submitted that NTDCL has no objection regarding temporarily energization of second 63 MVA auto transformer which will not relieve BTPL from obligation to pay transformation losses incurred to NTDCL since energization of first transformer. However, the matter remained disputed and second auto transformer of BTPL was not energized by NTDCL.

5. Multiple hearings were held during which NTDCL insisted on HV-side metering and compensation for losses. NTDC & IESCO were again directed vide decision dated November 21, 2024 and November 29, 2024 to energize the second 63 MVA Auto Transformer from LV side for the time being and the No Load losses of this transformer (which will be





automatically measured/billed in the existing billing meter of BTPL) will be borne by the Complainant till the case is decided by NEPRA.


6. In response, NTDCL in its letter dated May 09, 2025 has submitted that NGC/NTDC has concerns regarding NEPRA's interim decision to energize the subject transformer from the LV side. This action may encourage Bahria Town Pvt. Ltd. (BTPL) to operate the transformer under load without resolving the outstanding metering issues on the HV side of transformers T1 and T2. Moreover, continuous energization from the LV side risks overvoltage, potential equipment damage, and system disturbance. Energization from the LV side alone will not benefit Bahria Town's consumers unless the HV side is also energized. In view thereof, energization of the second 63 MVA auto transformer remained pending.

7. Foregoing in view, it has been concluded that BTPL constructed the 220kV Grid station due to non-availability of 132kV system in the vicinity. During proceedings of the case, BTPL offered to hand over the 220kV grid station along with the assets/property/land to NTDC free of cost. However, NTDC was reluctant to take over the grid station. Although Terms of References (TORs) were exchanged, NTDCL declined the takeover, citing technical incompatibilities. DISCOs have LV side metering, their transformers are owned and operated by NTDCL. Imposing additional transformation losses to BTPL under the C-3 tariff, which already includes losses, may lead to double charging. BTPL is a consumer of IESCO and currently the user of the 220kV grid station is IESCO. IESCO has provided connections to BTPL on the 132kV side. As such, the issue of losses is between NTDC and IESCO and must be resolved by these two entities. In case of any disagreement, the parties may approach NEPRA.

8. In view of the above, NTDC is directed to energize the 2nd 63 MVA auto transformer from any side i.e. HV or LV as deemed appropriate in order to avoid any untoward situation in case of any N-1 contingency.


(Lashkar Khan Qambrani)
Member, Complaints Resolution Committee/
Director (CAD)


(Muhammad Irfan-ul-Haq)
Member, Complaints Resolution Committee /
Assistant Legal Advisor (CAD)


(Naveed Illahi Shaikh)
Convener, Complaints Resolution Committee /
Director General (CAD)

Islamabad, July 07, 2025

