



National Electric Power Regulatory Authority
ISLAMIC REPUBLIC OF PAKISTAN
NEPRA Head Office
Attaturk Avenue (East) Sector G-5/1, Islamabad.
Ph:051-2013200, Fax: 051-2600021

**Consumer Affairs
Department**

TCD 09/ 4103 -2025
September 29, 2025

Chief Executive Officer,
K-Electric Limited, KE House No 39-B,
Sunset Boulevard Phase-II, Defence Housing Authority,
Karachi.

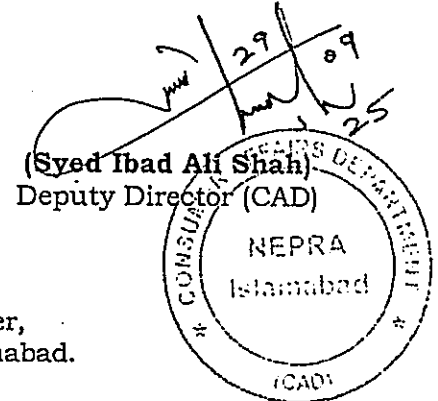
Subject: DECISION IN THE MATTER OF COMPLAINT FILED BY MR. NASIR IQBAL,
GENERAL SECRETARY, GARDEN CITY COMMUNITY WELFARE
ASSOCIATION UNDER SECTION 39 OF THE REGULATION OF
GENERATION, TRANSMISSION AND DISTRIBUTION OF ELECTRIC
POWER ACT, 1997 AGAINST K-ELECTRIC LIMITED REGARDING LOAD
SHEDDING.
KElectric-KHI-19248-01-23

Please find enclosed herewith the decision of NEPRA Complaints Resolution Committee (CRC) dated September 29, 2025, regarding the subject matter for necessary action.

Encl: As above

Copy to:-

1. Mr. M. Imran Hussain Qureshi
Chief Regulatory Affairs Officer & Govt. Relations Officer,
K-Electric Ltd. Office, 56 A, Street No. 88, G-6/3, Islamabad.
2. Mr. Abid Hussain, Advisor,
Provincial Office Consumer Affairs,
Office # 101, 1st Floor, Balad Trade Centre,
Aalamgir Road, B.M.C.H.S., Bahadurabad, Karachi
3. Mr. Nasir Iqbal, General Secretary,
Garden City Community Welfare Association,
A-74, Block B, Garden City, Scheme 45, Karachi.





BEFORE THE
NATIONAL ELECTRIC POWER REGULATORY AUTHORITY
Complaint No. KHI-19248-01-23

Mr. Nasir Iqbal, General Secretary
Garden City Community Welfare Association
A-74, Block B, Garden City, Scheme 45, Karachi.

..... Complainant

VERSUS

K-Electric Limited (KE)
KE House No. 39-B,
Sunset Boulevard Phase-II, Defense Housing Authority
Karachi.

..... Respondent

Subject: DECISION IN THE MATTER OF COMPLAINT FILED BY MR. NASIR IQBAL, GENERAL SECRETARY, GARDEN CITY COMMUNITY WELFARE ASSOCIATION UNDER SECTION 39 OF THE REGULATION OF GENERATION, TRANSMISSION AND DISTRIBUTION OF ELECTRIC POWER ACT, 1997 AGAINST K-ELECTRIC LIMITED REGARDING LOAD SHEDDING.

DECISION

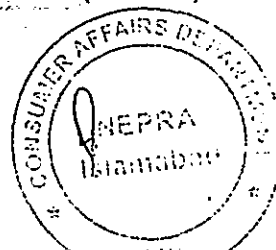
Reference is made to the subject complaint.

2. Brief facts of the case are that NEPRA received a complaint from Mr. Nasir Iqbal, General Secretary, Garden City Community Welfare Association, Karachi (Hereinafter referred to as "Complainant") against K-Electric (Hereinafter referred to as "KE" or "Respondent") regarding Load shedding.

3. The matter was taken-up with KE for submission of comments/report. In response KE submitted that the electricity to the Complainant's area is supplied from "GARDEN CITY" Feeder which falls in "Very High Loss" category based on its Aggregate Technical and Commercial Losses. Hearings in the matter were held at NEPRA Regional Office, Karachi. Accordingly, NEPRA vide its decision dated August 11, 2023 directed K-Electric to re-evaluate the losses of Block A after disconnection/removal of PMT(s) of Block B & C from the existing feeder and connect them with other nearby feeders.

4. Being aggrieved with the decision of Consumer Complaints Tribunal, K-Electric filed a motion for leave for review under NEPRA (Review Procedure) Regulations, 2009. After detailed deliberation, the motion for review was dismissed and the decision dated August 11, 2023 was up held.

5. Being aggrieved with the decision of NEPRA Consumer Complaints Tribunal, K-Electric challenged the decision before the Appellate Tribunal (NEPRA). The Appellate Tribunal

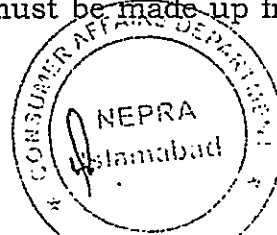


(NEPRA) vide its decision dated February 27, 2024 referred the appeal back to NEPRA with the observations that load shedding is a nationwide problem, NEPRA cannot be engaged into electricity operations (micro-management) and KE should have suggested acceptable alternate solution for the residents of Garden City. Further, Appellate Tribunal (NEPRA) directed both parties to appear before NEPRA on March 14, 2024, however both parties failed to put their appearance on March 14, 2024.

6. Accordingly, another hearing opportunity was given to the parties on April 18, 2024 wherein both parties participated and submitted their respective arguments. Accordingly, the case was re-examined in detail in light of the directions of Appellate Tribunal (NEPRA), record made so available by both the parties, arguments advanced during the hearing and applicable law, KE vide decision dated May 20, 2025 was directed to disconnect the impugned PMT from HT side and only legal connections of Block-A of the Garden City be shifted from that PMT to other PMTs of the Block-A of the Garden City and take all necessary actions to discourage illegal hook connections. In response, KE submitted report and informed that the impugned PMT has been disconnected from HT side. The report was forwarded to the Complainant. However, the Complainant has again approached this office and submitted that KE has again provided illegal hook connections to Block B & Block C on the Maryland feeder and KE is carrying out illegal load shedding against NEPRA Act and other applicable documents.

7. The case has been examined in detail in light of the record made so available by the parties, arguments advanced during the hearing and applicable law. The following has been observed:

- i. The instant matter pertains to load shedding by K-Electric in the area of Garden City, Block-A, Karachi.
- ii. The load shedding being carried out by KE is neither due to generation constraints nor transmission/ distribution constraints rather KE is carrying out load shedding on AT&C basis. K-Electric is of the view that the area of Complainant is supplied from "GARDEN CITY" Feeder which falls in "Very High Loss" category based on its Aggregate Technical and Commercial Losses. According to KE, load shedding is being carried out as per National Power Policy. However, there is no force in the argument of KE as the National Power Policy directs for progressive elimination of load shedding in all areas, including rural areas, for consumers who pay their electricity bills, in accordance with the legal framework of the country. KE has failed to reduce load shedding in that area.
- iii. The Complainant is of the view that KE has been conducting load shedding in violation of NEPRA rules & regulations.
- iv. Pursuant to Section 21(2)(b) of the NEPRA Act, the Licensee is responsible to provide distribution service and make sales of electric power within its territory on a non-discriminatory basis to all the consumers who meet the eligibility criteria laid down by the Authority.
- v. Pursuant to Section 21(2)(f) of the NEPRA Act; the Licensee is required to follow the performance standards laid down by the Authority for distribution and transmission of electric power, including safety. Furthermore, Rule 4(f) of NEPRA Performance Standards (Distribution) Rules, 2005, states that:
 - a. A distribution company shall have plans and schedules available to shed up to 30% of its connected load at any time upon instruction from NTDC/System Operator. This 30% load must be made up from separate

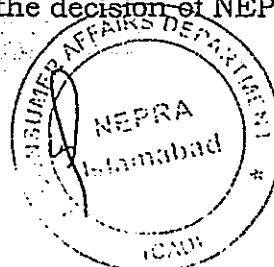


blocks of switchable load, which can be disconnected in turn at the instruction from NTDC/System Operator, A distribution company shall provide copies of these plans to NTDC/System Operator.

- b. Wherever possible NTDC/System Operator shall give distribution companies advance warning of impending need for load shedding to maintain system voltage and/or frequency in accordance with the Grid Code.
- c. As per the provisions of the Grid Code, NTDC/System Operator shall maintain an overview and as required instruct each distribution company the quantum of load to be disconnected and the time of such disconnection. This instruction shall be given in clear, unambiguous terms and related to prepared plans.
- d. When instructed by NTDC/System Operator, the distribution companies shall shed the load in the following order, namely:
 - (i) Supply to consumers in rural areas; and residential consumers in urban areas where separate feeders exist.
 - (ii) Supply to consumers, other than industrial, in urban areas.
 - (iii) Supply to agriculture consumers where there is a dedicated power supply.
 - (iv) Supply to industrial consumers.
 - (v) Supply to schools and hospitals.
 - (vi) Supply to defense and strategic installations.
- vi. Section 23F(2)(b) of the NEPRA Act, 1997 (to be read with successive amendments) stipulates that all licensees shall be responsible to make sales of electric power within its territory on a non-discriminatory basis to all the consumers who meet the eligibility criteria laid down by the Authority. Additionally, NEPRA Licensing (Electric Power Supplier) Regulations, 2022 imposes an obligation on electric power supplier/ licensee to provide safe, secure, reliable and efficient electric power supply on a non-discriminatory basis to all persons who meet the consumer eligibility criteria.
- vii. A distribution company shall prepare schedules of load disconnection, which demonstrate this priority order and which rotate load disconnections within the above groups in a non-discriminatory manner. The principle of proportionality shall be kept in mind so as not to excessively burden a particular consumer class.

8. It is obligatory on the K-Electric to supply un-interrupted electric power to its consumers. Furthermore, the consumer/complainant cannot be held liable and punished on account of non-paying consumers of K-Electric. Being located in the same locality where other community members enjoy load shedding free electricity, it would be rather unconstitutional and discriminatory on part of K-Electric to punish the Complainant on behalf of others in the shape of long hours of power-cut. The electricity is a fundamental right as guaranteed by the Constitution of Islamic Republic of Pakistan, 1973 which is also held by the Honorable Supreme Court of Pakistan in its reported Judgment of Alleged Corruption in Rental Power Plants etc., Human Rights Case (2012 SCMR 773).

9. The Authority has imposed a penalty of Rs. 50 Million upon KE for carrying out load shedding in violation of provisions of the NEPRA Act and other enabling Rules & Regulations. However, KE has challenged the same before Appellate Tribunal (NEPRA) whereby the Tribunal has issued restraining orders against the decision of NEPRA.

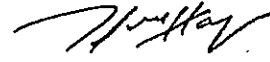


10. Foregoing in view, KE is directed to upgrade the distribution system in the area of the Complainant if required, including but not limited to installation of ABC cables, AMR meters, removal of kundas/lodging of FIRs etc. to curtail theft of electricity to ensure uninterrupted electric power supply to the residents of Garden city within a period of three (03) months.



(Lashkar Khan Qambrani)

Member, Complaints Resolution Committee/
Director (CAD)



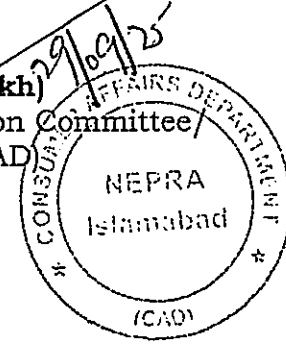
(Muhammad Irfan-ul-Haq)

Member, Complaints Resolution Committee/
Assistant Legal Advisor



(Naweed Illahi Shaikh)

Convener, Complaints Resolution Committee/
Director General (CAD)



Islamabad, September 29, 2025