



**Registrar**

# **National Electric Power Regulatory Authority**

## **Islamic Republic of Pakistan**

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

Tel: +92-51-9206500, Fax: +92-51-2600026

Web: [www.nepra.org.pk](http://www.nepra.org.pk), E-mail: [registrar@nepra.org.pk](mailto:registrar@nepra.org.pk)

No. NEPRA/R/ADG(Tariff)TRF-100/ 20884-87

December 09, 2025

Subject: **Decision of the Authority in the matter of requests filed by XWDISCOs for Periodic Adjustment in tariff for the 1<sup>st</sup> Quarter of FY 2025-26**

Dear Sir,

Enclosed please find herewith the subject Decision of the Authority alongwith **Annex-A** (total 33 Pages) and Additional Note of Mr. Rafique Ahmad Shaikh, Member(NEPRA) in the subject matter.

2. The Decision is being sent to the Federal Government for intimation under Proviso (ii) of Section 31(7) of NEPRA Act, before its notification by NEPRA pursuant to the said Proviso of Section 31(7) of NEPRA Act, 1997.

Enclosure: **As above**

Secretary,  
Ministry of Energy (Power Division),  
'A' Block, Pak Secretariat,  
Islamabad

  
(Wasim Anwar Bhinder)

**Copy to:**

1. Secretary Ministry of Energy (Power Division), 'A' Block, Pak Secretariat, Islamabad
2. Secretary, Ministry of Finance, 'Q' Block, Pak Secretariat, Islamabad
3. Mr. Shehriyar Abbasi, Deputy Secretary, Cabinet Division, Cabinet Secretariat, Islamabad

**DECISION OF THE AUTHORITY IN THE MATTER OF REQUESTS FILED BY XWDISCOs FOR  
PERIODIC ADJUSTMENT IN TARIFF FOR THE 1<sup>st</sup> QUARTER OF FY 2025-26**

1. The Authority determined Consumer-end Tariff for FY 2025-26, including Power Purchase Price (PPP) reference for XWDISCOs on June 23, 2025, and intimated the same to the Federal Government. The Federal Government, against the aforementioned determinations/decisions, filed Motion, under Section 7 and 31 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (NEPRA Act) read with Rule 17 of the NEPRA (Tariff Standards and Procedure) Rules, 1998 for recommendation of uniform consumer end tariff. The said Motion was decided by the Authority on July 01, 2025 and was subsequently notified by the Federal Government w.e.f. July 01, 2025.
2. XWDISCOs, in line with the NEPRA Act and prescribed quarterly adjustment mechanism as per their tariff determinations, filed adjustment requests on account of variation in PPP, including impact of T&D losses etc., for the 1<sup>st</sup> quarter of the FY 2025-26 i.e. from July to September 2025, as summarized below:

DISCOs Request	UNIT	FESCO	GEPCO	HESCO	SEPCO	IESCO	LESCO	MEPCO	PESCO	TESCO	QESCO	HAZECO	Total
FCA Impact of T&D Losses	Rs. Mln	(277)	(257)	(229)	(187)	(231)	(512)	(545)	(448)	(22)	(112)	(94)	(2,914)
V. O&M	Rs. Mln	(566)	(451)	(187)	(97)	(491)	(929)	(651)	(361)	(39)	(119)	(87)	(3,978)
Capacity Charges	Rs. Mln	2,337	4,226	(3,212)	1,528	1,151	8,453	4,347	(120)	(254)	1,772	1,474	21,702
UOSC/MoF	Rs. Mln	(796)	(551)	(803)	(320)	(889)	(952)	(1,133)	(704)	(168)	(113)	(6)	(6,435)
<b>Total Under / (Over) Recovery</b>	<b>Rs. Mln</b>	<b>698</b>	<b>2,967</b>	<b>(4,431)</b>	<b>924</b>	<b>(460)</b>	<b>6,060</b>	<b>2,018</b>	<b>(1,633)</b>	<b>(483)</b>	<b>1,428</b>	<b>1,287</b>	<b>8,375</b>

3. The proposed quarterly adjustments are formula based and as per the already prescribed mechanism. However, since the impact of any such adjustments has to be made part of the consumer end tariff, the Authority, in order to provide an opportunity of hearing to all the concerned and meet the ends of natural justice, decided to conduct a hearing in the matter.
4. The hearing was scheduled on November 06, 2025, for which advertisement was published in newspapers on October 25, 2025. Separate notices were also sent to the stakeholders for inviting comments from the interested/ affected parties. Salient features of the proposed adjustments along-with adjustment requests/addendums of all XWDISCOs were uploaded on NEPRA's website for information of all concerned.
5. The hearing was held as per the schedule on November 06, 2025, which was attended by XWDISCOs, CPPA-G and other stakeholders including general public and media.
6. During the hearing, the XWDISCOs presented their data before the Authority, including the comparison of actual sales against reference sales and the corresponding variances. Several commentators suggested that the XWDISCOs be directed to present this analysis through a presentation in future hearings to facilitate a clearer understanding of their data. The Authority concurred with the suggestion and directed all XWDISCOs to include such analysis as part of their quarterly adjustment request and present the same in subsequent quarterly hearings in a structured manner.
7. Several commentators raised concerns regarding positive quarterly adjustment despite the Government's renegotiation and termination of contracts with various IPPs aimed at reducing





overall costs. It was clarified that the impact of these renegotiations and contract terminations has already been incorporated into the rebased tariff for FY 2025-26, resulting in a reduction in capacity charge component of the overall tariff.

8. During the hearing, the Authority opined that negative capacity cost claimed by HESCO and PESCO may be due to loadshedding being carried out by these XWDISCOs, which reduces their MDI and consequently reduces their share of allocation of capacity charges. However, this reduction in MDI due to loadshedding results in double jeopardy for the consumers, first in the shape of non-provision of electricity and secondly in the shape of uniform application of quarterly adjustments, considering uniform tariff regime in the country.
9. APTMA submitted their written comments wherein they expressed serious concerns over the alarming increase in capacity payments, a direct result of electricity demand consistently clocking in below the benchmark. It was further submitted that APTMA, on multiple occasions, has highlighted deficiencies in the demand forecasting methodology adopted by the Ministry of Energy (Power Division) (MoE). On one hand, the MoE projects reduction in industrial power tariffs to Rs.23/kWh under the announced (but not yet notified) incremental consumption package; on the other, the ground reality is that industrial tariffs are around Rs. 32/kWh and set to rise by Rs. 3-4/kWh on account of negative fuel cost and quarterly adjustments, being replaced with positive ones. The trend of multinational corporations exiting Pakistan and domestic manufacturers, especially in the textile sector, shutting down entire production lines is symptomatic of this crisis. Naturally, such developments depress electricity demand. The transition of captive users to the grid was promoted as a transformative step that would improve system utilization, yet we have not seen any corresponding improvement in overall demand, while the viability of export-oriented businesses and the gas sector has been severely undermined. APTMA also requested certain data from XWDISCOs.
10. APTMA, further, submitted that the Government has failed to provide electricity where genuine demand exists. For example, in the Lasbela Industrial Estate Development Authority (LIEDA), APTMA members have repeatedly requested an additional 25-30 MW of supply, but load enhancements have not been granted, despite ample stranded capacity and system demand remaining below benchmark levels. The current positive quarterly adjustment will only exacerbate the problem. Higher tariffs will further disincentivize consumption, particularly during winter months when demand is seasonally low and significant capacity remains underutilized.
11. Post hearing, APTMA reiterated its earlier submissions and requested that the XWDISCOs should make detailed tariff-category-wise power consumption statistics transparently accessible for the public.
12. Mr. Tanveer Barry, a commentator, raised concerns regarding the expected decrease in hydrology over the upcoming winter months which may also result in positive FCAs coupled with proposed positive quarterly adjustments. In response, it was explained that while setting up monthly FCA references in the base tariff, low hydrology for winter months is incorporated as part of the assumption set.

*Male - 7*

*2/33*





13. Mr. Rehan Javed, a commentator, raised certain queries regarding increase in circular debt for the quarter July to September 2025 and on the expected industrial support package (ISP). Mr. Javed highlighted that, despite the imposition of DSS, the circular debt had increased by Rs. 79 billion in the first quarter of FY 2025-26. He further submitted that while designing the ISP, the MoE did not undertake consultations with the relevant stakeholders.
14. Mr. Aamir Sheikh submitted written comments wherein it was stated that if Quarterly Tariff Adjustment (QTA) is increased as per petition, the net effect to consumers will be around Rs 2.30/unit. This is in addition to the recent FCA increases. This is deadly for the industry which is already struggling. The tariff which had fallen to Rs.30/unit after great efforts has bounced back to Rs.34/unit and is heading to Rs.36-37/unit. Dollar rate was taken as PKR 290 in tariff determination yet even at USD282, QTA is positive. Despite the fact that KE is now drawing 2000MW from North which increased our FCA but was supposed to reduce QTA. A near 20% increase in tariff with stable USD will completely render our exports uncompetitive.
15. It was further submitted by Mr. Aamir Sheikh that despite mass shifting of captive to grid, the QTA is still positive. He further submitted that Government had committed to use the gas levy on captive to reduce electricity rates. The levy is being charged since February 2025 but its impact is not passed on to electricity consumers.
16. The Authority observed that the issues raised by APTMA and Mr. Rehan Javed primarily pertain to the MoE, however, despite Authority's directions no representative from the MoE was present during the hearing to respond to the stakeholders' queries. In view thereof, the MoE shall ensure that in future a senior level official is present in all such hearings in order to respond to the queries raised by the commentators during the hearing.
17. The Authority, in order to work out the instant quarterly adjustments of XWDISCOs, obtained details of actual Power Purchase cost billed by CPPA-G to DISCOs for the 1<sup>st</sup> quarter of the FY 2025-26 i.e. from July to September 2025. CPPA-G provided the information, and also certified that:
  - a. **2002 Power Policy Plants**
    - i. Invoices of all Capacity Purchase have been processed in accordance with rates, Terms & Conditions as determined by NEPRA. Payments related to periodical adjustments are also made as per decision of NEPRA.
    - ii. The above statement is true, based on facts and from verifiable documentary evidences. In case of any deviation/variation observed if not rectified at later stage, CPPA-G will be responsible for the consequences arising out of any misstatement under NEPRA Act and the Rules & Regulations.
  - b. **1994 Power Policy Plants**
    - i. Invoices of all Capacity Purchase have been made strictly in accordance with the rates, terms & conditions as stipulated in the respective Power Purchase Agreement.
    - ii. All payments to IPPs are being made after observing all formalities provided in the respective Power Purchase Agreement.





- iii. The above statement is true, based on facts and from verifiable documentary evidences. In case of any deviation/variation observed if not rectified at later stage, CPPA-G will be responsible for the consequences arising out of any misstatement under NEPRA Act and its Rules & Regulations.
18. Thus, for the purpose of determination of 1<sup>st</sup> quarter of the FY 2025-26, the information submitted by CPPA-G along-with certification of CPPA-G has been relied upon. In case of any variation, error, omission or misstatement found out at a later stage, CPPA-G shall be responsible and the same would be adjusted in the subsequent quarterly adjustments. The plant wise detail of capacity charges and utilization factors for the quarter from July to September 2025, as submitted by CPPA-G are attached as **Annex-A** with the instant decision. The Authority noted that for WAPDA & PEDO etc., CPPA-G has provided a consolidated figure instead of plant wise break up. CPPA-G is directed to ensure that in future, details of plant wise capacity charges should be provided for each month of the quarter, for all plants connected with the National Grid.
19. In light of the above discussion, information submitted by CPPA-G and adjustment requests filed by XWDISCOs, the Authority has decided to restrict the amount of quarterly adjustment for the 1<sup>st</sup> quarter of the FY 2025-26, as requested by XWDISCOs on account of variation in Capacity charges, Variable O&M, Use of System Charges and Market Operator Fee. However, regarding FCA impact on T&D losses, the same has been worked out as per the Authority's approved monthly FCAs decisions for the relevant months.
20. Here it is pertinent to mention that HESCO in its instant quarterly adjustment request has also claimed an amount of Rs.96.949 million on account of unrecovered pending costs of CPPs/ SPPs. The same is tabulated below:

**HYDERABAD ELECTRIC SUPPLY COMPANY LIMITED**  
STATEMENT SHOWING COST OF SPPs  
FROM JULY-2025 TO SEPTEMBER-2025

Sr.#	Months	As per HESCO Data				
		Units (GWh)	Fuel Cost Component (Rs. In M)	Fixed Cost Component (Rs. In M)	ROE (Rs. In M)	Total Cost (Rs. In M)
1	Jul-25	11.128	-	28.102	4.308	32.410
2	Aug-25	11.121	-	28.085	4.305	32.390
3	Sep-25	11.038	-	27.876	4.273	32.149
		33.287	-	84.064	12.885	96.949

21. Regarding the above claim, the Authority, has decided to provisionally allow capacity cost based on reference tariff as part of instant quarterly adjustment. Any adjustment, if required, shall be made subsequently.
22. Based on the discussion made in the above paragraphs and after considering the aforementioned adjustments, the Authority has determined a positive adjustment of Rs.6,067 million on account of variation in Capacity charges, Variable O&M, Use of System Charges, Market Operator Fee and FCA impact on T&D losses for the 1<sup>st</sup> quarter of FY 2025-26.







23. It is pertinent to mention here that as per earlier practice, and the fact that the adjustment is being made in the already notified uniform tariff, the Authority beside determination of DISCO wise rate of quarterly adjustment, also determines a uniform rate for the quarterly adjustments to be charged from the consumers.
24. The Authority has decided to allow positive quarterly adjustments of Rs.6,067 million pertaining to the 1<sup>st</sup> quarter of the FY 2025-26, in a period of 03 months i.e. December 2025 to February 2026, at a uniform rate of positive Rs.0.3298/kWh, to be applicable to all consumer categories, except lifeline consumers and prepaid consumers.

Description	UNIT	FESCO	GEPSCO	HESCO	SEPCO	IESCO	LESCO	MEPCO	PESCO	TESCO	QESCO	HAZECO	Total
FCA Impact of T&D Losses	Rs. Mln	(322)	(301)	(273)	(222)	(279)	(587)	(606)	(522)	(24)	(119)	(107)	(3,362)
V. O&M	Rs. Mln	(566)	(450)	(203)	(176)	(486)	(924)	(699)	(375)	(39)	(120)	(95)	(4,133)
Capacity Charges	Rs. Mln	2,336	4,123	(3,268)	101	1,151	8,453	4,323	(140)	(260)	1,772	1,429	20,020
UOSC/MoF	Rs. Mln	(796)	(551)	(805)	(320)	(889)	(952)	(1,133)	(708)	(168)	(113)	(22)	(6,459)
<b>Total Under / (Over) Recovery</b>	<b>Rs. Mln</b>	<b>652</b>	<b>2,821</b>	<b>(4,550)</b>	<b>(617)</b>	<b>(503)</b>	<b>5,990</b>	<b>1,885</b>	<b>(1,745)</b>	<b>(491)</b>	<b>1,419</b>	<b>1,205</b>	<b>6,067</b>
<b>Projected Sales for 3 months (excluding Life Line sales)</b>	<b>GWh</b>	<b>2,447</b>	<b>1,888</b>	<b>650</b>	<b>425</b>	<b>2,261</b>	<b>4,153</b>	<b>2,552</b>	<b>1,965</b>	<b>390</b>	<b>1,193</b>	<b>474</b>	<b>18,397</b>
<b>Per Unit Impact</b>	<b>Rs./kWh</b>	<b>0.2666</b>	<b>1.4943</b>	<b>(6.9983)</b>	<b>(1.4517)</b>	<b>(0.2225)</b>	<b>1.4423</b>	<b>0.7387</b>	<b>(0.8878)</b>	<b>(1.2596)</b>	<b>1.1896</b>	<b>2.5446</b>	<b>0.3298</b>

25. It is important to note that Federal Government issued Policy Guidelines to NEPRA, vide letter dated 22.08.2023, for uniform application of quarterly adjustments on XWDISCOs and K-Electric consumers. The policy guidelines state that NEPRA shall determine the same tariff rationalization for K-Electric consumers as determined for XWDISCOs consumers, with same application period. The Policy Guidelines are reproduced hereunder:
- In order to maintain uniform tariff across country, NEPRA shall determine application of quarterly tariff determinations (QTAs) of XWDISCOs on KE consumers by way of tariff rationalization. NEPRA shall determine the same tariff rationalization for K-Electric consumers as determined for XWDISCOs consumers, with same application period, keeping in view financial sustainability of the sector and uniform tariff policy of the Federal Government.*
  - Subsidy or surcharge against the determined tariff for K-Electric consumers shall be assessed on an annual basis instead of monthly or quarterly basis.*
  - Federal Government's motion with respect to recommendation of consumer end tariff for K-Electric Limited dated March 17, 2023 pursuant to the 1<sup>st</sup> Quarterly adjustment of FY 2022-23 determination for XWDISCOs, shall be considered accordingly.*
26. In view of the above discussion, relevant provisions of NEPRA Act, National Electricity Policy and Policy Guidelines issued by the Federal Government, the Authority has decided to allow the application of instant quarterly adjustments on the consumers of K-Electric as well, with the same applicability period. Accordingly, the instant quarterly adjustment of positive Rs.0.3298/kWh shall also be charged from the consumers of K-Electric except life line and prepaid consumers, to be recovered in a period of 03 months i.e. December 2025 to February 2026.

Matti. J

5/33





27. In case any bills for the applicable period of the instant adjustment, are issued before the notification of this decision, the same may be applied in subsequent month.
28. While effecting the Quarterly Adjustments, the concerned XWDISCOs shall keep in view and strictly comply with the orders of the courts notwithstanding this order.
29. Furthermore, the Authority directs all XWDISCOs to submit their quarterly adjustment request immediately after the close of quarter to allow for timely processing of these requests. Additionally, XWDISCOs are also directed to provide category wise detail of increase/decrease in sales of each quarter, over reference sales as well as actual sales of corresponding period of previous year period along-with Quarterly adjustments request. For industrial consumers, such details, for each category i.e. B1, B2, B3 & B4 shall be shown separately.
30. The MoE shall also ensure that senior level professionals are present during hearings to respond the queries raised by stakeholders during hearing.
31. The instant decision along-with attached Annexure, is intimated to the Federal Government, prior to its notification in the Official Gazette as per Section 31 (7) of the NEPRA Act.

**AUTHORITY**

⊗

Rafique Ahmed Shaikh  
Member

Ms. Amina Ahmed  
Member

Engr. Maqsood Anwar Khan  
Member

Waseem Mukhtar  
Chairman

⊗ Additional note alongwith Annexures is enclosed.





Plant Wise Capacity Summary Q-1 (FY 2025-26)			Jul-25		Aug-25		Sep-25	
Sr. No.	Plant Name	Site	CPP (Rs)	Plant Factor	CPP (Rs)	Plant Factor	CPP (Rs)	Plant Factor
1	WAPDA Hydel		18,196,557,069	76%	14,666,252,721	76%	14,811,889,124	69%
2	Azad Jammu & Kashmir Power Development Organization (Jagran-I)		-	82%	-	67%	-	52%
3	Pakhtunkhwa Energy Development Organization (Malakand-III)		135,685,969	70%	1,192,875,308	49%	131,319,719	48%
4	Laraib Energy Limited		451,721,895	8%	585,118,808	7%	421,854,528	14%
5	Star Hydro Power Limited		1,424,083,949	67%	939,999,999	52%	1,870,071,866	36%
6	Neelum Jhelum Hydropower Company (Pvt.) Ltd.		-	0%	-	0%	-	0%
7	Mira Power Limited		2,633,251,664	60%	643,705,392	77%	656,556,860	55%
8	Daral Khwar HPP		-	56%	-	48%	-	27%
9	Karot Power Company (Pvt.) Limited		5,800,705,204	59%	11,380,244,237	56%	6,601,172,970	59%
10	Ranolia Hydro Power Complex		-	0%	-	0%	-	0%
11	S K Hydro (Private) Limited		20,692,922,168	66%	17,576,984,721	44%	8,100,291,742	27%
12	Jamshoro Power Company Limited-(Genco-1)		-	0%	-	0%	-	0%
13	Jamshoro Power Company Limited-CFPP		-	0%	3,505,963,563	2%	2,654,165,922	22%
14	Central Power Generation Company Limited-(Genco-2) Guddu Old Blocks		-	0%	469,000,000	0%	-	0%
15	Central Power Generation Company Limited-(Genco-2) Guddu 747MW CCPP		20,761,599	50%	891,617,319	47%	975,758,482	38%
16	Northern Power Generation Company Limited-(Genco-3) TPS Muzaffargarh		57,530,713	0%	246,152,344	0%	184,586,251	0%
17	Northern Power Generation Company Limited-(Genco-3) Nandipur CCPP		1,175,255,957	45%	797,157,500	37%	604,791,799	19%
18	The Hub Power Company Limited (HUBCO)		-	0%	-	0%	-	0%
19	Kohinoor Energy Ltd.		124,059,860	6%	118,202,890	2%	121,131,375	7%
20	Lalpir Power (Private) Limited		-	0%	-	0%	-	0%
21	Pak Gen Power Limited		-	0%	-	0%	-	0%
22	Fauji Kabirwala Power Company Ltd.		258,755,969	17%	258,755,969	2%	408,852,462	1%
23	Roush Pak Power Ltd.		-	0%	-	0%	-	0%
24	Saba Power Company (Pvt.) Ltd.		-	0%	-	0%	-	0%
25	Uch Power Ltd.		404,880,456	89%	530,922,115	85%	368,768,450	83%
26	Altern Energy Ltd.		-	0%	-	0%	-	0%
27	Liberty Dahrki Power Limited		40,853,752	51%	250,959,814	45%	244,006,707	54%
28	PAEC Chashma Nuclear Power Plant. I	Mianwali C-1	1,411,287,400	31%	1,778,491,665	98%	1,662,341,423	96%
29	PAEC Chashma Nuclear Power Plant. II	Mianwali C-2	1,954,759,544	101%	1,948,809,354	100%	1,891,698,505	101%
30	PAEC Chashma Nuclear Power Plant. III	Mianwali C-3	4,068,399,621	98%	3,966,537,947	89%	3,838,572,286	88%
31	PAEC Chashma Nuclear Power Plant. IV	Mianwali C-4	3,946,417,341	18%	3,946,211,422	0%	3,819,848,233	83%
32	Karachi Nuclear Power Plant-Unit-2		12,483,413,168	12%	12,601,628,076	99%	12,174,901,239	97%
33	Karachi Nuclear Power Plant-Unit-3		13,050,371,662	99%	13,049,974,293	98%	12,647,394,151	96%
34	Tavanir Iran		171,384	24%	117,816,784	11%	129,204,223	16%
35	Attock Gen Limited		106,970,305	10%	100,316,154	10%	90,624,097	4%
36	Atlas Power Limited		-	0%	-	0%	-	0%
37	Nishat Power Limited		218,590,330	7%	225,816,134	8%	372,409,379	7%
38	Foundation Power Company Daharki Ltd.		167,477,922	84%	66,232,492	78%	58,713,211	81%
39	Orient Power Company (Private) Limited		567,535,406	40%	411,526,483	46%	244,112,286	31%
40	Nishat Chunian Power Limited		549,150,571	6%	18,839,506	1%	341,555,161	5%
41	Saif Power Limited		398,061,575	24%	271,973,568	21%	300,000,000	4%
42	Engro Powergen Qadirpur Limited		317,526,983	44%	299,378,326	45%	254,656,686	44%
43	Sapphire Electric Company Limited		257,685,095	26%	100,403,083	25%	196,188,321	6%
44	Narowal Energy Limited		103,019,347	9%	72,516,611	0.5%	300,090,407	3%
45	Liberty Power Tech Limited		394,429,053	17%	364,733,831	17%	221,857,763	3%
46	Halmore Power Generation Company Limited		495,275,657	39%	433,043,448	17%	258,696,758	4%
47	Uch-II Power (Pvt.) Limited		687,314,019	75%	336,279,868	70%	1,008,793,366	63%
48	JDW Sugar Mills Ltd. II	PLANT-II	55,587,342	96%	-	100%	115,662,925	100%
49	JDW Sugar Mills Ltd. III	PLANT-III	58,653,506	98%	-	96%	72,876,781	92%
50	Shahtaj Sugar		-	0%	-	0%	-	1%
51	RYK Mills Limited		-	0%	391,600	0%	2,297,093	0%
52	Chiniot Power Limited		-	0%	-	0%	286,574	0%
53	Hamza Sugar Mills Limited		-	0%	-	0%	-	0%
54	Almoiz Industries Limited		-	0%	-	0%	3,795,336	0%
55	Chanar Energy Limited		-	0%	3,235,048	2%	2,317,015	0%
56	China Power Hub Generation Company (Pvt.) Ltd		10,307,862,047	17%	10,116,483,370	15%	18,200,216,973	0%
57	Engro Powergen Thar (Pvt) Limited		5,070,214,803	83%	4,883,148,947	80%	5,005,449,339	47%
58	Thai Industries Corporation Ltd		-	0%	-	0%	731,885	0%
59	Quaid-e-Azam Thermal Power (Pvt) Limited		2,230,496,057	64%	710,564,630	55%	2,024,528,775	52%
60	National Power Parks Management Company Private Limited HBS	Haveli B/Shah	1,381,323,776	79%	1,412,318,729	75%	62,805,638	58%
61	Huaneng Shandong Ruyi Energy (Pvt) Ltd		8,539,191,943	64%	9,070,479,622	55%	8,321,035,970	53%
62	National Power Parks Management Company Private Limited Baloki	Balokli Power	1,474,786,688	70%	934,017,933	64%	1,477,299,298	73%
63	Port Qasim Electric Power Company (Pvt.) Limited		8,984,384,111	33%	7,776,752,819	28%	9,590,660,939	31%
64	Lucky Electric Power Company Limited		4,812,342,088	20%	5,986,470,752	49%	3,674,131,913	38%
65	Punjab Thermal Power Private Limited		2,300,172,205	22%	1,063,315,442	21%	1,164,937,069	13%
66	Kot Addu Power Company Limited (KAPCO)		-	9%	-	11%	-	22%
67	Thar Energy Limited		2,621,086,473	75%	2,575,884,091	74%	3,356,114,623	76%
68	Thar Coal Block-1 Power Generation Company (Pvt) Limited		12,638,055,548	88%	10,473,248,339	83%	10,250,798,371	76%
69	ThalNova Power Thar (Pvt.) Ltd		2,651,893,395	71%	2,572,623,948	70%	3,334,225,361	73%
70	TPS-Quetta		-	0%	-	0%	-	0%
71	Zorlu Enerji Pakistan Limited		248,044,290	36%	638,427,373	31%	154,082,648	19%
72	FFC Energy Limited		304,919,066	30%	265,986,400	27%	187,720,583	15%
73	Three Gorges First Wind Farm Pakistan (Private) Limited		391,661,268	36%	355,777,242	31%	241,303,537	18%
74	Foundation Wind Energy-I Limited		425,519,645	30%	495,888,515	27%	515,470,461	23%
75	Sapphire Wind Power Company Limited		648,861,752	34%	588,277,776	29%	374,077,255	17%
76	Yunus Energy Limited		479,868,228	35%	400,577,428	31%	293,464,194	19%
77	Metro Power Company Ltd		779,451,223	38%	1,161,122,546	34%	2,880,298	22%
78	Gul Ahmed Wind Power Ltd		1,091,143,331	36%	44,087,749	31%	290,327,612	20%
79	Master Wind Energy Limited		601,740,930	38%	553,132,210	33%	278,620,639	19%
80	Tenaga Generasi Limited		523,235,014	31%	497,340,564	27%	456,966,534	25%
81	ACT Wind (Pvt) Limited		250,761,527	37%	238,811,554	33%	193,669,794	20%
82	Hydrochina Dawood Power (Private) Limited		573,488,974	33%	544,535,514	29%	563,981,812	20%
83	Sachal Energy Development (Private) Limited		596,895,740	35%	875,114,614	31%	573,485,065	19%
84	UEP Wind Power (Pvt)Ltd		1,295,352,677	36%	1,189,534,018	31%	725,538,215	20%
85	Quaid E Azam Solar Power Pvt Ltd		260,776,206	18%	208,132,629	18%	258,486,209	20%



Mohd. I



86	Appollo Solar Development Pakistan Limited		639,845,409	19%	648,320,158	19%	698,023,203	21%
87	Best Green Energy Pakistan Limited		537,201,061	18%	669,503,813	19%	718,457,888	21%
88	Crest Energy Pakistan Limited		524,593,556	19%	682,369,595	19%	732,834,022	21%
89	Harappa Solar (Pvt) Limited		88,435,804	22%	85,371,603	19%	72,106,828	21%
90	AI Power (Private) Ltd.		44,140,191	17%	47,292,522	18%	65,563,976	19%
91	Artistic Energy (Pvt.) Limited		391,979,859	51%	360,174,203	44%	247,777,556	30%
92	Jhimpir Power (Private) Limited		631,258,341	50%	629,686,506	42%	761,269,080	27%
93	Hawa Energy (Private) Limited		565,494,254	47%	594,107,714	40%	406,795,645	26%
94	Three Gorges Third Wind Farm Pakistan (Private) Limited		555,300,128	39%	538,628,351	33%	310,944,705	21%
95	Three Gorges Second Wind Farm Pakistan Limited		542,342,043	38%	504,218,710	33%	338,278,386	20%
96	Tricon Boston Consulting Corporation (Private) Limited A	Project A	765,201,483	54%	663,740,900	44%	943,045,609	31%
97	Tricon Boston Consulting Corporation (Private) Limited B	Project B	729,333,719	51%	648,511,844	43%	825,833,565	29%
98	Tricon Boston Consulting Corporation (Private) Limited C	Project C	689,925,544	50%	643,112,834	42%	815,350,180	28%
99	Zephyr Power (Pvt.) Limited		488,035,301	48%	605,871,131	42%	516,216,713	35%
100	Foundation Wind Energy-II Limited		434,872,277	33%	507,007,265	29%	212,928,136	25%
101	Master Green Energy Limited		322,963,334	59%	295,337,559	51%	218,316,317	37%
102	Lucky Renewables (Private) Limited		381,882,232	56%	272,886,470	47%	195,250,449	32%
103	ACT2 DIN Wind (Pvt) Ltd.		264,853,136	52%	260,059,490	44%	183,975,821	31%
104	Artistic Wind Power (Pvt) Ltd.		258,802,956	48%	232,440,613	41%	194,029,708	29%
105	Indus Wind Energy Ltd.		282,260,809	52%	250,831,645	44%	165,624,942	33%
106	Lakeside Energy Limited		274,857,756	51%	281,483,878	45%	180,170,041	31%
107	Liberty Wind Power-I Ltd.		246,309,467	45%	240,347,472	40%	166,283,790	28%
108	DIN Energy Ltd.		236,325,571	45%	248,779,757	41%	168,884,057	28%
109	Gul Ahmed Electric Limited		262,062,237	49%	242,480,720	43%	154,069,607	31%
110	Atlas Solar Limited		216,246,497	24%	216,588,473	23%	214,272,978	24%
111	Liberty Wind Power-II (Pvt.) Ltd.		251,746,914	49%	238,373,300	42%	176,030,326	29%
112	NASDA Green Energy Limited		275,686,953	51%	252,613,825	45%	182,441,167	31%
113	Metro Wind Power Limited		444,354,396	57%	402,227,787	49%	329,211,539	40%
114	Helios Power Limited		107,070,392	25%	102,907,718	24%	100,463,514	24%
115	Meridian Energy Limited		107,232,006	25%	102,475,718	24%	101,276,068	25%
116	HINDS Energy Limited		106,493,461	25%	102,805,943	24%	100,681,950	24%
Total			175,662,990,619	54%	169,230,137,226	54%	155,615,291,044	50%

Mak. 9



### Additional Note of Member (Tech.)—Adjustment in Tariff for 1<sup>st</sup> Quarter of FY 2025-26.

The quarterly adjustment primarily reflects variations in the Power Purchase Price (PPP), including the impact of T&D losses. The data attached with the decision clearly shows lower plant factors for thermal power plants operating under 'Take-or-Pay' capacity contracts. The reduced utilization of these plants is not only a result of lower demand but is also driven by AT&C-based load shedding by DISCOs.

As a consequence, the inefficiencies of DISCOs are being passed on to law-abiding consumers. At the same time, consumers involved in electricity theft are effectively enabled to continue doing so during non-load-shedding hours, while the financial impact of this theft is shifted onto paying consumers. This raises the cost of electricity for compliant consumers, further suppressing demand and reducing plant utilization—ultimately pushing tariffs even higher. This cycle has become a vicious one.

It is also evident from the data that the capacity payment for the first quarter of FY 2026 increased to around Rs. 500 billion—an increase of about Rs. 19 billion compared to the same period last year, when it stood at approximately Rs. 481 billion.

The capacity payments being made to old, inefficient, and non- or under-utilized public sector power plants including old GENCOs and WAPDA Hydel must be reviewed immediately, as they are placing an undue burden on the power sector. Additionally, the utilization of comparatively inefficient power plants—often in violation of EMO due to transmission constraints—has also been observed and requires urgent corrective action.

The rise in capacity payments resulting from the low or non-utilization of power plants, as well as the dispatch of costlier plants in violation of EMO, is further increasing the overall power generation cost. Immediate measures are therefore needed to enhance operational efficiency and ensure the financial sustainability of the sector.

A similar situation exists with RE power plants, where seasonal and hourly variations in generation are adversely affecting the overall performance of the power sector. The cost of electricity from newly commissioned hydropower projects—both in the public and private sectors—as well as from earlier commissioned wind and solar plants still in their debt-servicing period, is placing a significant burden on consumers. In several cases, their per-unit power purchase price (PPP) is substantially higher (**Annex-I**), further straining the electricity sector. Therefore, any new addition to the generation mix, including renewable energy, must be carefully evaluated to prevent further financial burden on the power sector.

NEPRA has consistently highlighted these issues through various regulatory instruments, including the annual State of Industry Report. NEPRA has also initiated proceedings against several power-sector entities (**Annex-II**) responsible for operational inefficiencies. However, meaningful outcomes have remained limited due to underlying structural challenges within the power sector.

In this context, I strongly recommend that the costs arising from inefficiencies within power sector entities should not be passed on to electricity consumers. Instead, the concerned organizations should bear these inefficiencies themselves. Transferring such costs to consumers may lead to an industrial slowdown, reduced GDP growth, increased unemployment, pressure on the current account deficit, weakened socio-economic activities, and an overall deterioration in the quality of life across the country.

12  
9/33





While I firmly believe that the cost of systemic inefficiencies should not be passed on to electricity consumers, I feel compelled to highlight few key inefficiencies within the current power sector framework and to propose potential remedies for consideration.

### **Persistent Underutilization of 'Take-or-Pay' Thermal Power Plants**

The continued underutilization of thermal power plants is contributing to an increase in the per-unit Capacity Purchase Price (CPP). This phenomenon warrants careful examination, particularly to determine whether the underutilization stems from a genuine lack of demand in the system. Evidence suggests otherwise: seven out of twelve distribution companies are still enforcing load shedding exceeding 12 hours per day in certain regions. Such extensive load shedding also penalizes law-abiding consumers, undermines confidence in the grid, and pushing consumers to seek alternative sources of electricity.

### **Ineffectiveness of AT&C Loss Reduction as a Remedy**

Efforts to improve the sector by targeting Aggregate Technical & Commercial (AT&C) losses through widespread load shedding have not yielded the intended results. Focusing solely on reducing AT&C losses—without addressing the broader operational inefficiencies—has proven insufficient to restore the health and long-term sustainability of the power sector.

### **Poor Quality of Distribution Services and Fiscal Burdens**

The quality of service provided by distribution companies remains suboptimal. Compounded by heavy taxes, levies, and surcharges—particularly the Debt Servicing Surcharge—these factors collectively inflate electricity costs for consumers. The result is a shifting of consumers towards decentralized or off-grid solutions, further weakening the demand for grid-based electricity.

### **Rapid Growth of On-Grid and Off-Grid Solar Installations**

In recent years, on-grid solar installations have surpassed 6,000 MW, and total solar capacity, including both on-grid and off-grid systems, has reached approximately 13,000 MW. While this growth indicates a positive shift towards renewable energy, it also highlights a structural problem: consumers are increasingly seeking energy alternatives due to high tariffs, unreliable service, and lack of trust in the conventional electricity grid.

### **Additional Sectoral Inefficiencies**

Other factors—though beyond the immediate scope of this decision—also exacerbate the situation, including:

- Payment obligations such as PLAC (Part Load Adjustment Charges) and NPMV (Non Project Missed Volume)
- Higher T&D losses and Short recoveries of the billed amount
- High receivables
- Transmission constraints
- Operation of plants in violation of the Economic Merit Order
- Underutilization of assets across all power sector segments

These systemic inefficiencies contribute to rising electricity tariffs, creating a vicious cycle: higher tariffs suppress demand, while low demand in turn increases tariffs.



12

1/33



### **Economic and Social Implications**

The cumulative impact of these inefficiencies is not merely financial; it is also economic and social. The country's overall economy suffers due to an unreliable and poorly managed power system. The failure to provide sustainable, affordable, and reliable electricity erodes consumer trust and confidence. Consequently, consumers—from low-consumption residential households to high-consumption industrial users—are compelled to explore independent energy solutions.

### **Industrial Competitiveness and the Need for Rational Tariff Structuring**

It is well established that bulk and productive electricity demand is primarily driven by industrial consumers. Unfortunately, industrial growth in Pakistan has remained unsatisfactory specifically during past few years. Despite a large domestic market, reliance on imported goods continues to rise because many locally manufactured products are costlier than imported alternatives. Industrial representatives consistently report that the high cost of electricity—combined with the continued practice of burdening industrial users to subsidize other consumer categories—is a major factor behind this un-competitiveness.

Stakeholders across the industrial sector have repeatedly highlighted that this policy approach is short-sighted and ultimately counterproductive. Its long-term consequences permeate the entire economy, including:

- Closure of industrial units and reduced productive activity
- Underutilization of “take-or-pay” power generation capacity, causing inefficiencies and greater financial burden on the sector
- Increasing unemployment, driven by shrinking industrial output
- Reduction in government revenues from taxes and other industrial contributions
- Greater foreign exchange pressure on the national exchequer due to increased dependence on imported goods

International experience shows that while some countries extend targeted support or subsidies to enhance industrial competitiveness, they do not compel their industries to subsidize other consumer categories.

Although several short-term relief packages have been extended to industries in recent years, none have provided the long-term certainty, cost rationalization, or structural reforms required to ensure industrial sustainability and growth. As a result, the industrial sector remains vulnerable, and the broader objectives of power-sector reform—efficiency, affordability, competitiveness, and economic stability—remain unattainable.

Given the current challenges in the power sector, the following measures are strongly recommended to restore industrial competitiveness and strengthen the overall electricity value chain:

#### **Eliminate Cross-Subsidization for Industrial Consumers:**

Industries should be relieved from the responsibility of subsidizing other consumer categories until the power sector is able to offer truly competitive tariffs. The existing cross-subsidization framework undermines industrial viability, suppresses growth, and ultimately contradicts broader national economic objectives.



Handwritten signature and date 11/33.



**Reduce the Taxation Burden on Industrial Electricity Consumption:**

Industrial consumers must not be weighed down by excessive taxes, levies, and surcharges—particularly the Debt Servicing Surcharge—which significantly inflates their effective electricity cost. These additional financial burdens erode competitiveness, discourage investment, and hinder export performance.

**Reform Time-of-Use (TOU) Tariffs and Remove PLAC Burdens:**

TOU tariffs should be rationalized to remove the unnecessary burden of PLAC and to provide genuinely lower electricity prices during periods of low system demand. This restructuring would:

- Improve plant utilization and system efficiency
- Reduce the average cost of generation
- Provide industries with affordable off-peak energy
- Minimize operational and economic inefficiencies across the power system

Implementing these reforms is critical not only for revitalizing industrial competitiveness but also for ensuring the long-term financial sustainability of the power sector. A strong and expanding industrial base is essential for increasing electricity offtake, improving load factors, reducing capacity-related costs, and stabilizing the sector as a whole.

1  
10  
1



**a. Wind Power Plants**

Name of Power Plant	Indexed Tariff as on 30th June 2025 (Rs./kWh)
UEP Wind Power (Pvt.) Ltd.	47.04
Hydrochina Dawood Power (Pvt.) Ltd.	47.02
Sapphire Wind Power Company Ltd.	45.57
Tenaga Generasi Ltd.	43.64
Sachal Energy Development (Pvt) Ltd.	41.89
Gul Ahmed Wind Power Ltd.	40.74
Master Wind Energy (Pvt.) Ltd.	40.74
Tricon Boston Consulting Corporation (Pvt.) Ltd. -A	37.02
Tricon Boston Consulting Corporation (Pvt.) Ltd. -B	37.02
Tricon Boston Consulting Corporation (Pvt.) Ltd. -C	37.02
Three Gorges Second Wind Farm Pakistan Ltd.	36.81
Three Gorges Third Wind Farm Pakistan (Pvt.) Ltd.	36.81
Hawa Energy (Pvt.) Ltd.	36.15
Jhimpir Power (Pvt.) Ltd.	36.15
Yunus Energy Ltd.	34.78
Metro Power Company Ltd.	34.22
Zephy Power (Pvt.) Ltd.	32.06
Act Wind (Pvt.) Ltd.	29.02
Foundation Wind Energy-II (Pvt.) Ltd.	21.61
Foundation Wind Energy-I Ltd.	21.02
Artistic Energy (Pvt.) Ltd.	20.39

**b. Solar Power Plants**

Name of Power Plant	Indexed Tariff as on 30th June 2025 (Rs./kWh)
Crest Energy Pakistan Ltd.	48.29
Best Green Energy Pakistan Ltd.	47.81
Appolo Solar Development Pakistan Ltd.	45.91
Oursun Pakistan Ltd.	30.28
Quaid-e-Azam Solar Power (Pvt) Ltd.	29.65
Harappa Solar (Pvt.) Ltd.	29.27
AJ Power (Pvt.) Ltd.	29.01

**c. Hydel Power Plants**

Name of Power Plant	Indexed Tariff as on 30th June 2025 (Rs./kWh)
Suki Kinari	31.60
Karot	26.43
Star Hydro (Patrind)	27.28
Mira (Gulpur)	33.54

Since the above tariff does not account for intermittency costs, consumers ultimately bear the burden of the renewable plant's seasonal and hourly variability.

13/33





In a Take-or-Pay power generation fleet where available generation capacity is underutilized, adding new capacity is generally feasible only if it replaces costlier energy. In other words, the power purchase price of the generation facility to be added in the system shall be lower than the Energy Purchase Price (EPP) of the currently unutilized, Take-or-Pay electric power generation capacity.

To assess the impact of electricity from the above-mentioned renewable energy (RE) power plant on the power sector, the Energy Purchase Price (EPP) of several underutilized, Take-or-Pay thermal power plants for the first quarter of FY 2026 is presented below.

Sr. No.	Name of Power Plant	Dependable Capacity	Jul-25		Aug-25		Sep-25	
			Utilization Factor	EPP	Utilization Factor	EPP	Utilization Factor	EPP
		MW	%	Rs./kWh	%	Rs./kWh	%	Rs./kWh
1	Thar Coal Block-I	1230	NA	11.68	NA	13.72	75.84	12.65
2	Engro Power Thar	603	NA	12.47	79.49	13.69	77.93	18.58
3	Thar Energy Ltd.	300	NA	13.57	74.09	12.28	73.23	13.56
4	ThalNova	303	70.45	13.98	69.22	14.18	69.81	13.85
5	Guddu 747	721	NA	12.03	70.71	12.03	54.97	12.03
6	Engro PowerGen	213	44.22	13.02	44.33	13.22	42.54	11.32
7	Port Qasim	1243	33.70	13.97	28.71	12.37	32.06	11.58
8	Lucky Electric	605	19.99	14.00	48.66	14.15	38.07	12.99
9	UCH-II	372	73.10	14.12	71.17	14.71	60.27	14.6
10	Sahiwal Power	1244	93.51	14.64	55.34	15.95	56.20	15.95
11	China Hubco Coal	1249	46.50	15.79	15.35	13.73	0.32	13.73
12	Jamshoro Coal	620	-	-	3.06	13.96	36.91	14.54

NA: Utilization above 80%.

From the above it is obvious that currently the power purchase from RE power plants is more costlier than the conventional thermal power plants despite the facts the RE power plant have either zero or very nominal EPP.

1  
2  
1



## Challenges Affecting Monitoring Effectiveness

(Amount in Rupees Million)					
		Generation	Transmission	Distribution	Total
Fine Proceeding Concluded	No.	41	09	62	112
	Amount	849.5	66	1482	2397.5
Fine Deposited by Licensees in Compliance with the Authority's Decision	No.	-	01	09	10
	Amount	-	05	224.5	229.5
Fine Not Deposited in NEPRA	No.	41	08	53	102
	Amount	849.5	61	1257.5	2168

From the above table, it is evident that over the past 10 years, NEPRA has initiated and concluded 112 proceedings for various violations of its Applicable Documents, resulting in cumulative fines of Rs. 2,397 billion. However, fines were actually deposited in only 10 of these cases, amounting to a mere Rs. 229 million. The remaining 102 cases—representing more than Rs. 2 billion in penalties—have been challenged by licensees before various appellate forums and remain pending adjudication.

The imposition of fines by NEPRA serves a critical regulatory purpose: to discourage non-compliance and encourage licensees to operate within the framework of NEPRA's Applicable Documents. A robust penalty mechanism is intended to ensure that market participants take their obligations seriously and proactively uphold safety, transparency, service quality, and financial discipline.

However, in practice, many licensees respond to enforcement actions by immediately contesting NEPRA's decisions, often resorting to legal and procedural maneuvers aimed at delaying the consequences rather than resolving the underlying issues. These delay tactics not only prolong the enforcement process but also weaken the credibility of the regulatory framework.

When penalties are not implemented in a timely manner, the deterrent effect diminishes. Licensees begin to perceive non-compliance as a low-risk option, believing that any adverse decision can be stalled indefinitely through litigation or procedural challenges. As a result, the regulatory environment becomes less effective, and NEPRA's ability to ensure good governance, operational efficiency, and consumer protection is compromised. Over time, this creates a cycle where non-compliance becomes normalized, enforcement becomes less impactful, and the overall governance standards of the sector decline.





**Status of Actions Taken and Fines Imposed by M&E Department (NEPRA) on (Generation, Transmission and Distribution) Licensees w.r.t. non-compliance of NEPRA Rules, Regulation, Standards, Codes of Conduct & other Applicable Documents (As of 30 June 2025)**

Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status	
<b>Generation</b>							
1.	GENCO-I	2017-18	5 Million	11.01.2018	Excess Auxiliary Consumption (2012 to 2014)	Under adjudication in NEPRA Appellate Tribunal	
2.		2017-18	5 Million	03.05.2018	Underutilization of power plants by JPCL	Under adjudication in NEPRA Appellate Tribunal	
3.		2019-20	1 Million	11.07.2019	Excess Auxiliary Consumption (2014-15 & 2015-16)	Under adjudication in NEPRA Appellate Tribunal	
4.	GENCO-I, II & III	2020-21	NA	07-04-2021	NA	NA	The Authority decided to convert the tariff of old GENCOs (except Guddu 747 and Nandipur) to "Take and Pay" basis. However, this could not be implemented as the GENCOs went into litigation
5.	GENCO-II	2017-18	5 Million	11.01.2018	Excess Auxiliary Consumption (2012 to 2014)	Under adjudication in NEPRA Appellate Tribunal	
6.		2017-18	5 Million	03.05.2018	Underutilization of power plants by CPGCL	Under adjudication in NEPRA Appellate Tribunal	
7.		2018-19	1 Million	09-05.2019	Excess Auxiliary Consumption (2014-15 & 2015-16)	Under adjudication in NEPRA Appellate Tribunal	



16/33

Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status	
8.		2022-23	100 Million	03.04.2023	Claiming excess capacity charges i.r.o different units of TPS Guddu, non-filing of tariff petition despite repeated directions of the Authority and non-submission of rehabilitation plan in respect of Unit 13 of TPS Guddu despite repeated directions of the Authority.	Under adjudication in NEPRA Appellate Tribunal	





Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
9.	GENCO-II	2022-23	50 Million	16.08.2022	Total power system collapse occurred on 09-01-2021.	Under adjudication in NEPRA Appellate Tribunal
10.		2022-23	50 Million	21.02.2023	Prolonged forced outage of Guddu 747.	NOD/RR issued
11.		2024-25	50 Million	11.10.2024	Acquisition of Gas Booster Compressor Station (GBCS) from Engro Fertilizers free of cost in consideration of utilization of gas quota and its subsequent transfer to NPGCL against Rs. 1.242 billion	Under adjudication in NEPRA Appellate Tribunal
12.		2024-25	100 Million	30.04.2025	Fine Imposed of Rs. 100 Million on CPGCL on account of tripping and fire incident of ST-16 of Guddu 747 CCPP	Review under process
13.	GENCO-III	2017-18	5 Million	11.01.2018	Excess Auxiliary Consumption (2012 to 2014)	Under adjudication in NEPRA Appellate Tribunal
14.		2017-18	5 Million	03.05.2018	Underutilization of power plants by NPGCL	Under adjudication in NEPRA Appellate Tribunal
15.		2019-20	0.5 Million	19.11.2019	Excess Auxiliary Consumption (2014-15 & 2015-16)	Under adjudication in NEPRA Appellate Tribunal
16.		2021-22	25 Million	18.02.2022	Failure to post sufficient O&M staff at the time of handing over/taking over Nandipur Power Plant resulting in shutdown of plant for a longer duration.	Under adjudication in NEPRA Appellate Tribunal



Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
17.	NTDC	2019-20	01 Million	12.02.2019	Underutilization of power plants by NPCC/NTDC.	Under adjudication in NEPRA Appellate Tribunal
18.		2019-20	01 Million	06.04.2020	Violation of Economic Merit Order	Under adjudication in NEPRA Appellate Tribunal
19.		2021-22	50 Million	29.04.2022	Delay in system restoration following total power system collapse occurred on 09.01.2021.	Under adjudication in NEPRA Appellate Tribunal
20.		2022-23	10 Million	20.10.2022	Revision in minimum loading position of Lalpir and Pakgen Power Plants.	Review under process
21.	CPPA-G	2022-23	10 Million	20.10.2022	Revision in minimum loading position of Lalpir and Pakgen Power Plants.	Review under process
22.		2022-23	50 Million	16.05.2023	Non-compliance with the directions of the Authority and failure to fulfill its obligations under the Commercial Code and other documents.	Review under process
23.		2023-24	50 Million	09.08.2023	Making excess capacity payments i.r.o different units of TPS Guddu.	Notice of demand and RR issued
24.		2023-24	10 Million	23.08.2023	Extension in term of the PPA signed with KAPCO by 485 days without prior approval of the Authority	Review under process
25.	K-Electric	2022-23	20 Million	13.02.2023	Delay in restoration of power supply after total power system collapse occurred on 09-01-2021.	Under adjudication in NEPRA Appellate Tribunal





Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
26.	UCH-II	2022-23	10 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021.	Under adjudication in NEPRA Appellate Tribunal
27.	KAPCO	2022-23	10 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
28.	Engro Qadirpur	2022-23	10 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
29.	Balloki	2022-23	10 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
30.	Saba	2022-23	10 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal



Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
31.	Haveli B. Shah	2022-23	10 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
32.	Orient	2022-23	15 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
33.	Saif	2022-23	15 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
34.	Halmore	2022-23	15 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
35.	Sapphire	2022-23	15 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal





Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
36.	China Power	2022-23	15 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
37.	Bhikki	2022-23	20 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
38.	Sahiwal Coal	2022-23	20 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
39.	Engro Thar	2022-23	20 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
40.	Pak Gen	2022-23	25 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal



Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
41.	Port Qasim	2022-23	10 Million	13.02.2023	Delay in synchronization with the National Grid despite the restoration of supply at their bus bar by NTDC after total power system collapse occurred on 09-01-2021	Under adjudication in NEPRA Appellate Tribunal
42.	CPHGC	2022-23	10 Million	21.12.2022	Prolonged forced outage on China Power Hub Generation Company.	Review under process
<b>Total fine imposed on Generation Licensees</b>			<b>849.5 Million</b>			





Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
<b>Transmission</b>						
1.	NTDC	2016-17	05 Million	10.01.2017	Voltage & Frequency limit violations under PSTR-2005	Fine Deposited
2.		2018-19	10 Million	20.11.2018	Delay in power evacuation projects and development works i.e. 500 & 220 kV grid stations	Challenged in Islamabad High Court
3.		2019-20	01 Million	05-12-2019	Delay in grant of approval of Grid Interconnection Study (GIS) reports beyond the prescribed timelines as mentioned in Connection Code of Grid Code.	Challenged in Islamabad High Court
4.		2022-23	10 Million	30.09.2022	Tripping of 500-220kV Jamshoro Grid Station Resulting in Blackout in K-Electric & HESCO Regions.	Under adjudication in NEPRA Appellate Tribunal
5.		2022-23	10 Million	30.09.2022	Partial blackout occurred on May 22, 2021 due to system disturbance/ 500 kV Tower Collapse in wake of cyclonic winds	Under adjudication in NEPRA Appellate Tribunal
6.		2023-24	10 Million	19.07.2023	Investigation against NTDC under Section 27A of the NEPRA Act, 1997 (Fatal Accident) NTDC, Hyderabad on June 29, 2022 to July 01, 2022.	Under adjudication in NEPRA Appellate Tribunal



Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
7.	NTDC	2024-25	10 Million	26.02.2025	Investigation against NTDC under section 27A of NEPRA Act on account of fatal accident, involving Mr. Zain ul abideen and Mr. Khair Bux.	Fine order issued
8.	GENCO-II	2018-19	05 Million	09-08-2018	Poor maintenance of 220 kV switchyard of TPS Guddu resulting in blackout	Under adjudication in NEPRA Appellate Tribunal
9.	GENCO-III	2018-19	05 Million	24.05.2019	Poor maintenance of 220 kV switchyard of TPS Muzaffargarh resulting in blackout	Recovery Request issued
<b>Total fine imposed on Transmission Licensees</b>			<b>66 Million</b>			





Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
Distribution						
1.	K-Electric	2015-16	5 Million	25.03.2016	1. Under utilization	Fine Deposited
			5 Million		1. Discriminatory load shedding	
2.		2018-19	5 Million	25.09.2018	Unannounced Load Shedding during Sehr & Iftar Timing in Ramadan, 2017.	Challenged in Sindh High Court
3.		2018-19	2 Million	30.10.2018	Undue delay in restoration of Power Supply (Power Break Down on 28.06.2017) and Safety (03 Fatalities)	Fine Deposited
4.		2019-20	03 Million	03.10.2019	Non-Utilization of Alternate Fuel and Under Utilization of BQPS-I resulted in Unannounced Load Shedding.	Fine Deposited
5.		2019-20	50 Million	09.12.2019	Investigation Under Section 27A against K-Electric on account of fatal accidents occurred during the monsoon rains in July, 2019 & August, 2019. (K-Electric is responsible for 19 out of 35 fatalities)	Challenged in Sindh High Court
6.		2020-21	160 Million	27.08.2020	Investigation Under Section 27A against K-Electric on account of excessive unannounced load shedding in Karachi during the period from 21 <sup>st</sup> June to 10 <sup>th</sup> July, 2020.	Fine Deposited
		2020-21	33.5 Million	11.03.2022	Investigation Under Section 27A against K-Electric on account of fatal accidents during the period from July, 06, 2020 & August 12, 2020. (K-Electric is responsible for 13 out of 57 fatalities)	Fine Deposited
8.		2023-24	50 Million	03.04.2024	On account of AT&C based load shedding	Under adjudication in NEPRA Appellate Tribunal
9.		2024-25	10 Million	10.09.2024	On account of Fatal Accidents FY 2022-23	Fine Deposited

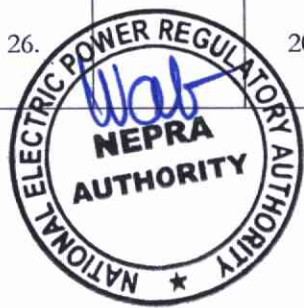


Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
10.	PESCO	2017-18	8 Million	08.08.2018	1. Non-utilization of allocated quota of power 2. Failure to remove system constraints	Recovery Request sent to Collector Islamabad for recovery of amount on 11.12.2018
11.		2018-19	6 Million	11.03.2019	1. Overloading & System Constraints 2. Safety 3. Investment Plans & its utilization 4. Pendency of ripe connections 5. Un due delay in Power Supply restoration 6. Low Voltage	Reminder Recovery Request sent on 26.03.2024 Recovery Request sent to Collector Islamabad for recovery of amount on 25.06.2019
12.		2020-21	13 Million	08.01.2021	Investigation Under Section 27A against PESCO on account of fatal accidents for the period from July, 2019 to Dec, 2019. (PESCO is responsible for 14 out of 26 fatalities)	Initially Challenged in Islamabad High Court, Under adjudication in NEPRA Appellate Tribunal
13.		2023-24	50 Million	03.04.2024	On account of AT&C based load shedding	Notice of demand and Recovery Request issued.
14.		2024-25	62 Million	05.07.2024	On account of Fatal Accidents FY 2022-23	Notice of Demand issued/Review under process
15.		2024-25	10 Million	13.12.2024	Earthing/Grounding of HT/LT structure PCC poles of distribution system	Order of the Authority issued on 03.02.2025.
16.	LESCO	2017-18	4 Million	26-07-2017	1. Incorrect data of tripping 2. Incorrect data of Complaints 3. Failure to restore power supply within specified time in case of damaging transformer. 4. Poor Quality of Supply (Low Voltages)	Challenged in Lahore High Court NEPRA has won the Court Case. Demand Notice issued Recovery Request sent





Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
17.	LESCO	2021-22	10 Million	15.06.2022	Fatal accident due to fallen of 200kVA transformer at Ichra Bazar, Lahore.	Initially challenged in NAT NEPRA won the case. After that, challenged in Lahore High Court.
18.		2022-23	10 Million	13.03.2023	Fatal accident occurred at UET/KSK, Lahore	Under adjudication in NEPRA Appellate Tribunal
19.	UET	2022-23	10 Million	21.02.2023	Fatal accident occurred at UET/KSK, Lahore	Under adjudication in NEPRA Appellate Tribunal
20.	LESCO	2024-25	23 Million	09.08.2024	On account of fatal accidents occurred due to moon soon spells in July, 2023.	Review rejected/DN issued
21.		2024-25	23 Million	05.07.2024	On account of Fatal Accidents FY 2022-23	Review rejected/DN issued
22.		2024-25	10 Million	20.09.2024	Earthing/Grounding of HT/LT structure PCC poles of distribution system	Order issued.
23.	GEPCO	2017-18	4 Million	30-08-2017	1. Incorrect data of tripping 2. Incorrect data of Complaints 3. Overloading of Power Transformers. 4. Poor Quality of Supply (Low Voltages)	Challenged in Lahore High Court. NEPRA has won the Court Case. Fine amount paid by GEPCO
24.		2020-21	21 Million	24-12-2021	Investigation Under Section 27A against GEPCO on account of fatal accidents for the period from July, 2019 to May, 2021. (GEPCO is responsible for 08 out of 13 fatalities)	Under adjudication in NEPRA Appellate Tribunal
25.		2024-25	23 Million	28-10-2024	On account of Fatal Accidents FY 2022-23	Notice of demand/Recovery Request issued
26.		2024-25	10 Million	27-10-2025	Earthing/Grounding of HT/LT structure PCC poles of distribution system	Order of the Authority issued

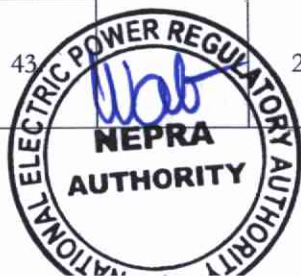


Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
27.	HESCO	2017-18	5 Million	11-07-2017	1. Incorrect data of tripping 2. Incorrect data of Complaints 3. Overloading of Power Transformers. 4. Poor Quality of Supply (Low Voltages) 5. Poor Utilization of Funds	Initially Challenged in Islamabad High Court. Bank Guarantee of Equal Amount was submitted by HESCO. Currently in NAT
28.		2021-22	31 Million	01-10-2021	Investigation Under Section 27A against HESCO on account of fatal accidents for the period from July, 2019 to October, 2020. (HESCO is responsible for 12 out of 15 fatalities)	Under adjudication in NEPRA Appellate Tribunal
29.		2021-22	26 Million	11-10-2021	Investigation Under Section 27A against HESCO on account of loss of 10 human lives on 22.07.2021 due to transformer explosion at Latifabad, Hyderabad.	Won from NAT Recovery Request to Collector Islamabad - sent on 13.11.2023 Reminder Recovery Request sent on 15.03.2024
30.		2021-22	10 Million	13.06.2022	Investigation Under Section 27A against HESCO on account of loss of 03 human lives on due to transformer explosion in Islamabad Chowk	Under adjudication in NEPRA Appellate Tribunal
31.		2023-24	50 Million	03.04.2024	On account of AT&C based load shedding	Per day fine amounting to Rs.100,000/day have been imposed
32.		2023-24	10 Million	22.09.2023	Non –compliance of Authority direction by CEO HESCO to take action against its employees on account of this criminal negligence.	Review filed by HESCO
33.		2024-25	20 Million	16.08.2024	On account of Fatal Accidents FY 2022-23	ND/RR issued
34.		2024-25	10 Million	13.12.2024	Earthing/Grounding of HT/LT structure PCC poles of distribution system	Order of the Authority issued on 03.02.2025/MLR under process
35.		2024-25	10 Million	03.02.2025	SCN issued to HESCO on account of the establishment of safety Directorate/Department	Order issued





Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
36.	SEPCO	2017-18	6 Million	01.11.2017	1. Incorrect data of tripping 2. Incorrect data of Complaints 3. Overloading of Power Transformers. 4. Poor Quality of Supply (Low Voltages) 5. Failure to restore power supply within specified time in case of damaging transformer. 6. Poor Utilization of Funds	Initially Challenged in Islamabad High Court. Bank Guarantee of Equal Amount has been submitted by SEPCO. Now Challenged in NAT
37.		2021-22	28 Million	07.09.2021	Investigation Under Section 27A against SEPCO on account of fatal accidents for the period from July, 2019 to November, 2020. (SEPCO is responsible for 11 out of 20 fatalities)	Under adjudication in NEPRA Appellate Tribunal
38.		2023-24	50 Million	03.04.2024	On account of AT&C based load shedding	Notice of demand/Recovery Request issued/ Per day fine amounting to Rs.100,000/day have been imposed
39.		2024-25	15 Million	05.07.2024	On account of Fatal Accidents FY 2022-23	Notice of Demand /RR issued
40.	FESCO	2017-18	4 Million	12-06-2018	1. Incorrect data of tripping 2. Incorrect data of Complaints 3. Overloading of Power Transformers. 4. Poor Quality of Supply (Low Voltages)	Recovery Request to Collector Islamabad - sent on 23.10.2018. Recovery Request to Collector Islamabad - sent on 13.11.2023 Reminder Recovery Request sent on 15.03.2024
41.		2021-22	26 Million	05-11-2021	Investigation Under Section 27A against FESCO on account of fatal accidents for the period from July, 2019 to January, 2021. (FESCO is responsible for 10 out of 17 fatalities)	Under adjudication in NEPRA Appellate Tribunal
42.		2024-25	15 Million	05.07.2024	On account of Fatal Accidents FY 2022-23	MLR rejected/DN issued
43.		2024-25	10 Million	10.09.2024	Earthing/Grounding of HT/LT structure PCC poles of distribution system	Earthing completion certificate received on 18.02.2025.

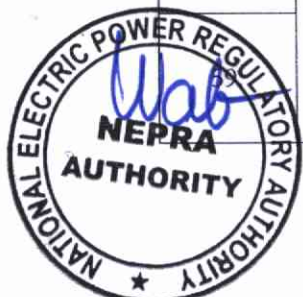


Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
44.	IESCO	2017-18	4 Million	18.10.2018	1. Incorrect data of tripping 2. Incorrect data of Complaints 3. Pendency of ripe connections. 4. Poor Quality of Supply (Low Voltages)	Fine Deposited
45.		2018-19	1 Million	25.01.2019	Non-compliance of Rule 4 (f) of PSDR 2005 – Failure to ensure the implementation of load shedding schedule in Bahria Town Rawalpindi.	Fine Deposited
46.		2021-22	65 Million	20.05.2022	Investigation Under Section 27A against IESCO on account of fatal accidents for the period from July, 2019 to June, 2021. (IESCO is responsible for 25 out of 39 fatalities)	Under adjudication in NEPRA Appellate Tribunal
47.		2023-24	35 Million	26.04.2024	On account of Fatal Accidents FY 2022-23	Under adjudication in NEPRA Appellate Tribunal
48.		2024-25	10 Million	19.09.2024	Earthing/Grounding of HT/LT structure PCC poles of distribution system	Under adjudication in NEPRA Appellate Tribunal
49.		2024-25	50 Million	04.11.2024	Legal proceedings against IESCO for delay in Grid Interconnection with Access Solar and Access Electric and subsequent loss to National Exchequer	Under adjudication in NEPRA Appellate Tribunal
50.		2024-25	200 Million	05.12.2024	Order of the Authority in the matter of SCN issued to IESCO on account of Non-Fatal accident of Ayesha BIBI, resident of Mannu Nagar Kachi Abadi, Hassan Abdal, District Attock, IESCO	Notice of Demand issued
51.	BTPL	2018-19	1 Million	28.01.2019	Non-compliance of Rule 4 (f) of PSDR 2005 – Failure to ensure the implementation of load shedding schedule in Bahria Town Rawalpindi.	Fine Deposited





Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
52.	MEPCO	2020-21	10 Million	01.10.2020	Investigation against MEPCO under Section 27A on account of fatal accident of Mr. Muhammad Ashraf LM-I Non-Compliance of Performance Standards, Distribution Code, Power Safety Code and other applicable documents	Won from NAT Recovery under process Notice of Demand issued on 02.04.2024. Challenged at LHC
53.		2020-21	6 Million	05.10.2020	1. Incorrect data of tripping 2. Incorrect data of Complaints 3. Pendency of ripe connections 4. Poor Quality of Supply (Low Voltages) 5. Failure to restore power supply within specified time in case of damaging transformer. 6. Safety	Under adjudication in NEPRA Appellate Tribunal
54.		2022-23	28 Million	14.10.2022	Investigation Under Section 27A against MEPCO on account of fatal accidents	Under adjudication in NEPRA Appellate Tribunal
55.		2024-25	13 Million	13.12.2024	SCN to MEPCO on account of fatal accidents for FY 2022-23	Order of the Authority issued on 03.02.2025/RR issued
56.		2024-25	10 Million	03-02-2025	Earthing/Grounding of HT/LT structure PCC poles of distribution system	Order of the Authority issued/RR issued
57.	QESCO	2022-23	10 Million	04.07.2022	Investigation Under Section 27A against QESCO on account of fatal accidents for the period from July, 2019 to June, 2021. (QESCO is responsible for 04 out of 15 fatalities)	Recovery Request sent to Collector on 19.10.2022 Reminder Recovery Request sent on 26.03.2024
58.		2023-24	50 Million	03.04.2024	On account of AT&C based load shedding	DN/RR issued
		2023-24	12.5 Million	22.03.2024	On account of Fatal Accidents FY 2022-23	Notice of demand issued/RR issued



Sr. #	Name of Licensee	Year	Amount of Fine	Date of issuance of Order	Violations	Latest Status
60.	QESCO	2024-25	10 Million	08-01-2025	Earthing/Grounding of HT/LT structure PCC poles of distribution system	Order of the Authority/RR issued
61.		2024-25	10 Million	28.01.2025	Order in the matter of SCN issued to QESCO on account of the establishment of safety directorate/department	Review filed by QESCO
62.	TESCO	2024-25	10 Million	03.02.2025	Earthing/Grounding of HT/LT structure PCC poles of distribution system	Order of the Authority/RR issued
Total fine imposed on Distribution Licensees			1482 Million			

