

## National Electric Power Regulatory Authority Islamic Republic of Pakistan

NEPRA Tower, Attaturk Avenue (East), G-5/1, Islamabad Ph: +92-51-9206500, Fax: +92-51-2600026 Web: www.nepra.org.pk, E-mail: registrar@nepra.org.pk

No. NEPRA/R/DG(Trf)/TRF-70/NCPL-2007/ 3902-06

March 17, 2025

## Subject: <u>Decision of the Authority in the Matter of Reimbursement of 7.5% Withholding Tax</u> on Dividends for Nishat Chunian Power Limited

Dear Sir,

Please find enclosed herewith the subject Decision of the Authority along with Annex-I (total 02 pages) regarding reimbursement of 7.5% withholding tax on dividends for the period March 01, 2025 to February 28, 2026 in respect of Nishat Chunian Power Limited in Case No. NEPRA/TRF-70/NCPL-2007.

2. The Decision is being intimated to the Federal Government for the purpose of notification in the official Gazette pursuant to Section 31(7) of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 within 30 days from the intimation of this Decision. In the event the Federal Government fails to notify the subject tariff Decision within the time period specified in Section 31(7), then the Authority shall notify the same in the official Gazette pursuant to Section 31(7) of NEPRA Act.

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Enclosure: As above

(Wasim Anwar Bhinder)

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

Copy to:

- 1. Secretary, Cabinet Division, Cabinet Secretariat, Islamabad
- 2. Secretary, Ministry of Finance, 'Q' Block, Pak Secretariat, Islamabad.
- 3. Chief Executive Officer, Central Power Purchasing Agency Guarantee Limited (CPPA-G), Shaheen Plaza, 73-West, Fazl-e-Haq Road, Islamabad
- 4. Chief Executive Officer, Nishat Chunian Power Limited (NCPL), 31-Q, Gulberg-II, Lahore [Ph: 042 35761730]

## DECISION OF THE AUTHORITY IN THE MATTER OF REIMBURSEMENT OF 7.5% WITHHOLDING TAX ON DIVIDENDS FOR NISHAT CHUNIAN POWER LIMITED

- Pursuant to the decision of the Authority dated 31<sup>st</sup> December 2010 in the matter of adjustment at Commercial Operation Date in the case of Nishat Chunian Power Limited (NCPL) and decision of the Authority dated April 2, 2021 in the matter of application filed by CPPA-G for adjustment of ROE & ROEDC components pursuant to signing of the master agreement with NCPL, withholding tax on dividend is a pass through item and the power purchaser shall make payment on account of withholding tax at the time of actual payment of dividend as hourly payment spread over a period of 12 months.
- 2. The Authority in its collective and joint wisdom considering all aspects decided with consensus as under; which will be hereafter called as decision of the Authority in the matter:-

"Based on the information and documentary evidence(s) provided by NCPL, the Authority hereby allow NCPL to claim Rs. 0.06947/kW/h from Central Power Purchasing Agency (Guarantee) Limited (CPPA-G) i.e. Power Purchaser for the period of March 1, 2025 to February 28, 2026 as a pass-through on the basis of Rs. 119,104,344/- paid as 7.5% withholding tax on dividends."

- 3. The above decision of the Authority along with revised schedule attached as Annex-I are to be notified in the Official Gazette in accordance with the provisions of Section 31(7) of the Regulation of Generation, Transmission and Distribution of Electric Power Act 1997.
- 4. CPPA (G) to ensure that all payments are consistent with the tariff determination.

Mathar Niaz Rana (nsc)

Member

Engr. Rafique Ahmed Shaikh Member

Amina Ahmed Member

Tauseef H. Farooqi Chairman



## AUTHORITY

Engr. Maqsood Anwar Khan Member

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Annex-I

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R	EIMBURSEME	NT OF 7.5% WITHHODING	TAX ON D	IVIDENDS	• ' }	
Tax Challan #	Payment Date	Dividend Amount agst. which Tax is Being Withheld	Withholding Tax Amount Requested		Withholding Tax Amount Allowed	
		(Rs)	Tax Rate	(Rs)	Tax Rate	(Rs)
IT-20241213-0101-1363426	- 13-Dec-24	466,796,440	7.50%	35,009,734		35,009,734
IT-20241213-0101-1363427		443,139,965	7.50%	33,235,497	7.50%	33,235,497
IT-20241213-0101-1363398		657,873,773	7.50%	49,340,532	7.50%	49,340,532
		20,239,502	15.00%	3,037,161	7.50%	1,518,581
		1,588,049,680		120,622,925		119,104,344
Calculation of Hourly Rate: Withholding tax on dividend Capacity Hours in a year Tariff component of withholding tax on dividend (1st March 2025 to 28th February 2026) Carry Forward of Unclaimed Dividend Tax As per Applicable Tariff: Balance Carried Forward for 12 <sup>th</sup> Agreement Year (21st July 2021 to 20th July 2022) (As per decision No. NEPRA/TRF-70/NCPL-2007/16872-76 dated 6 July 2023)				Rs. kW No. Rs./kW/Hour	EGO	119,104,344 195,722 8,760 0.06947 <b>Rs</b> 88,555,439
Maximum Limit for 13 <sup>th</sup> Agreement Year (21 <sup>st</sup> July 2022 to 20 <sup>th</sup> July 2023) Maximum Limit for 14 <sup>th</sup> Agreement Year (21 <sup>st</sup> July 2023 to 20 <sup>th</sup> July 2024) Balance Carried Forward Less claimed during 14 <sup>th</sup> Agreement Year (Interim Dividend @ 50% for Financial Year 2025) Less un-claimable due to exemption of withholding tax on dividend** Balance Carried Forward						106,111,935 106,402,653 <b>301,070,026</b> (119,104,344) (18,651,376) <b>163,314,306</b>

NISHAT CHUNIAN POWER LIMITED

\*\*Out of 367,346,939 paid-up shares, 49,737,003 shares at the time of payment of Interim Dividend 2025 @Rs. 5/share were exempt from withholding tax on dividends. Accordingly the carry forward of unclaimed withholding tax on dividends has been reduced to the extent of dividends paid to them.

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