



Registrar

National Electric Power Regulatory Authority

Islamic Republic of Pakistan

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No. NEPRA/R/ADG(Trf)/TRF-125/SECL-2009/ **19954-58**

December 31, 2024

Subject: **Decision of the Authority in the matter of Reimbursement of 7.5% withholding Tax on dividends for Sapphire Electric Company Limited**

Dear Sir,

Please find enclosed herewith the Decision of the Authority along with **Annex-I** (total 02 pages) regarding reimbursement of 7.5% withholding tax on dividends for the period from **January 01, 2025 to December 31, 2025** in respect of Sapphire Electric Company Ltd. in Case No. NEPRA/TRF-125/SECL-2009.

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.

Enclosure: **As above**



(Syed Zavar Haider)

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, Sapphire Electric Company Ltd., 7-A/K, Main Boulevard, Gulberg-II, Lahore 042-111000100.



DECISION OF THE AUTHORITY IN THE MATTER OF REIMBURSEMENT OF 7.5% WITHHOLDING TAX ON DIVIDENDS FOR SAPPHIRE ELECTRIC COMPANY LIMITED.

1. Pursuant to the Decision of the Authority dated November 23, 2012 in the matter of Motion for Leave for Review filed against the decision of the Authority at Commercial Operation Date (COD) in the case of Sapphire Electric Company Limited (SECL), 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 information and documentary evidence(s) provided by SECL, the Authority hereby allow SECL to claim Rs. 0.1220/kW/h from Central Power Purchasing Agency Limited i.e. Power Purchaser for the period from January 1, 2025 to December 31, 2025 as a pass-through on the basis of Rs. 226,594,921/- 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(s).

AUTHORITY

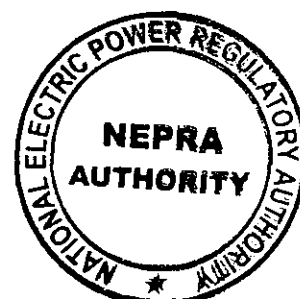
Mathar Niaz Rana (nsc)
Member

Engr. Maqsood Anwar Khan
Member

Engr. Rafique Ahmed Shaikh
Member

Amina Ahmed
Member

Waseem Mukhtar
Chairman



SAPPHIRE ELECTRIC COMPANY LIMITED
REIMBURSEMENT OF 7.5% WITHHOLDING TAX ON DIVIDENDS

Tax Challan #	Payment Date	Dividend Amount against which Tax is being Withheld (PKR)	WhT Requested		WhT Allowed	
			Rate	Rs.	Rate	Rs.
IT-20231215-0101-1371564	December 15, 2023	477,439,520	7.50%	35,807,964	7.50%	35,807,964
IT-20240419-0101-1411585	April 19, 2024	477,439,519	7.50%	35,807,964	7.50%	35,807,964
IT-20240507-0101-1164752	May 7, 2024	126,813,401	7.50%	9,511,005	7.50%	9,511,005
IT-20240531-0101-1925513	May 31, 2024	126,813,401	7.50%	9,511,005	7.50%	9,511,005
IT-20240704-0101-1084352	July 4, 2024	126,813,401	7.50%	9,511,005	7.50%	9,511,005
IT-20240704-0101-1084354		477,439,519	7.50%	35,807,964	7.50%	35,807,964
IT-20240827-0101-1698382	August 27, 2024	954,879,066	7.50%	71,616,003	7.50%	71,616,003
IT-20240827-0101-1698383		253,626,801	7.50%	19,022,011	7.50%	19,022,011
Total		3,021,264,628		226,594,921		226,594,921

Calculation of Hourly Rate:

Withholding Tax on dividend	Rs.	226,594,921
Capacity	kW	212,107
Hours in a year (365 x 24)	Hours	8,760
Tariff Component of withholding tax on dividend (January 1, 2025 to December 31, 2025)	Rs./kW/Hours	0.1220

Carry Forward of Unclaimed Dividend Tax As Per Applicable Tariff:

Balance Brought Forward from 12 th Agreement Year (Oct 5, 2021 to Oct 4, 2022)	Rs.	554,733,236
(As per decision No. NEPRA/R/ADG(Trf)/TRF-125/SECL-2009/16641-45 dated October 17, 2024)		
Add: Limit for the 13 th Agreement Year (Oct 5, 2022 to Oct 4, 2023)		147240683.3
Add: Limit for the 14 th Agreement Year (Oct 5, 2023 to Oct 4, 2024)		150945331.4
Maximum Limit Available		852,919,251
Less: Claimed during 13 th Agreement Year (Oct 5, 2022 to Oct 4, 2023)		(45,318,969)
1 st Interim Cash Dividend @ 15% for the Period Ended June 30, 2023		
Less: Claimed during 13 th Agreement Year (Oct 5, 2022 to Oct 4, 2023)		(45,318,969)
2 nd Interim Cash Dividend @ 15% for the Period Ended June 30, 2023		
Less: Claimed during 13 th Agreement Year (Oct 5, 2022 to Oct 4, 2023)		(45,318,969)
3 rd Interim Cash Dividend @ 15% for the Period Ended June 30, 2023		
Less: Claimed during 14 th Agreement Year (Oct 5, 2023 to Oct 4, 2024)		(90,638,014)
1 st Interim Cash Dividend @ 30% for the Period Ended June 30, 2024		
Un-claimable due to exemption of withholding tax on dividends*		
1 st Interim Cash Dividend @ 15% for the Period Ended June 30, 2023		
		(2,383,433)
2 nd Interim Cash Dividend @ 15% for the Period Ended June 30, 2023		
		(2,383,433)
3 rd Interim Cash Dividend @ 15% for the Period Ended June 30, 2023		
		(2,383,433)
1 st Interim Cash Dividend @ 30% for the Period Ended June 30, 2024		
		(4,766,865)
Balance Carried Forward		614,407,166

*Out of 424,021,347 paid-up Shares, 21,186,068 shares of Meezan Bank Limited are exempt from withholding tax on dividends. Accordingly the carry forward of unclaimed withholding tax on dividends have been reduced to the extent of dividends paid to Meezan Bank Limited.

**Based on data declared by Sapphire Electric Company Limited.

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