



Registrar

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/ADG(Trf)/TRF-122/UCH-II-2008/ **9428-32**

June 26, 2025

Subject: **Decision of the Authority in the matter of Reimbursement of 7.5 % Withholding Tax on Dividends for Uch-II Power (Private) Limited**

Dear Sir,

Please find enclosed herewith the decision of the Authority alongwith **Annex-I** (total 02 pages) regarding reimbursement of 7.5% withholding tax on dividends for the period from **June 01, 2025 to May 31, 2026** in respect of Uch-II Power (Private) Limited in Case No. NEPRA/TRF-122/UCH-II-2008.

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**

Wasim Anwar Bhinder
(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, Uch-II Power (Pvt.) Limited, Building 2-B, I&T Center, Sector G-6/1, Islamabad



DECISION OF THE AUTHORITY IN THE MATTER OF REIMBURSEMENT OF 7.5% WITHHOLDING TAX ON DIVIDENDS FOR UCH-II POWER (PRIVATE) LIMITED.

Pursuant to the decision of the Authority dated July 3, 2017 in the matter of adjustment at Commercial Operation Date (COD) and decision of the Authority dated April 24, 2018 in the matter of Motion for Leave for Review against COD filed by Uch-II Power (Private) Limited (hereinafter refer as Uch-II), withholding tax on dividend is a pass through item as per COD decision 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.

Uch-II claimed an amount of Rs. 1,875,000,000/- paid as 7.5% withholding tax on dividends during the 11th Agreement year i.e. April 4, 2024 to April 3, 2025. The maximum limit available for approval of withholding tax on dividend till 11th agreement year is Rs. 976,976,634/-. Accordingly, the same is allowed as pass through.

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 Uch-II, the Authority hereby allow Uch-II to claim Rs. 0.2929/kW/Hour from Central Power Purchasing Agency Limited i.e. Power Purchaser for the period from June 1, 2025 to May 31, 2026 as a pass-through on the basis of Rs. 976,976,634/- paid as 7.5% withholding tax on dividends.”

The above decision of the Authority along with the 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.

CPPA (G) to ensure that all payments are consistent with the tariff determination(s).

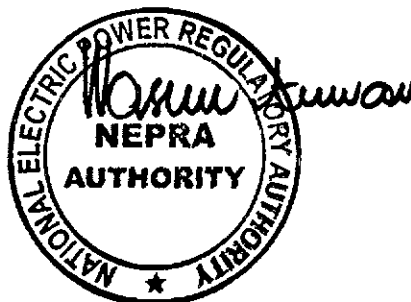
AUTHORITY

Engr. Rafique Ahmed Shaikh
Member

Amina Ahmed
Member

Engr. Maqsood Anwar Khan
Member

Waseem Mukhtar
Chairman



UCH-II POWER (PRIVATE) LIMITED
REIMBURSEMENT OF 7.5% WITHHODING TAX ON DIVIDENDS

Tax Challan #	Payment Date	Dividend Amount agst. which Tax is being Withheld	Tax Amount Requested	Tax Amount Allowed
			Rs.	Rs.
IT-20250424-0101-1564877	24-Apr-25	12,499,999,955	937,499,997	976,976,634
IT-20250424-0101-1569020	24-Apr-25	12,499,999,933	937,499,995	
IT-20250424-0101-1552503	24-Apr-25	22	2	
IT-20250424-0101-1567910	24-Apr-25	22	2	
IT-20250424-0101-1568078	24-Apr-25	22	2	
IT-20250424-0101-1568188	24-Apr-25	22	2	
IT-20250424-0101-1568387	24-Apr-25	22	2	
Total		24,999,999,998	1,875,000,000	976,976,634*

Calculation of Hourly Rate:

Withholding tax on dividend	Rs.	976,976,634
Capacity	kW	380,750
Hours in a year (365 x 24)	No.	8,760
Tariff component of withholding tax on dividend (June 1, 2025 to May 31, 2026)		0.2929

Carry Forward of Unclaimed Dividend Tax:

Balance brought forward from 10 th Agreement Year	Rs.	506,696,317
(NEPRA/R/ADG(Trf)/TRF-122/UCH-II-2008/19163-67 dated December 13, 2024)		

Add:

Limit for 11 th Agreement year (April 4, 2024 to April 3, 2025)	Rs.	470,280,317
--	-----	-------------

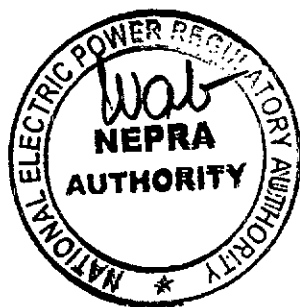
Less:

*Approved during 11 th Agreement Year i.e. April 4, 2024 to April 3, 2025 (Interim Dividend @223.236% for Dec 31, 2024)	(976,976,634)
--	---------------

Balance Carried Forward

* Maximum limit available for adjustment of withholding tax on dividend till 11th agreement year is Rs. 976,976,634/-. Accordingly, same is allowed instead of claimed amount of Rs. 1,875,000,000/-

- Based on Data Declared by Uch-II Power Private Limited.



She
S