No. PPDB/ /2022 PUNJAB POWER DEVELOPMENT BOARD **ENERGY DEPARTMENT** Irrigation Secretariat, Old Anarkali, Lahore (Ph: 042-99213879 Fax: 99213885) nor Date: 24-01- /2022 VEIMINIEI mülter milic The Registrar National Electric Power Regulatory Authority (NEPRA) NEPRA Tower. Attaturk Avenue, G-5/1, Islamabad

#### SUBJECT: APPLICATION OF WAPDA FOR MODIFICATION IN ITS GENERATION LICENCE

This is with reference to NEPRA's letter No.NEPRA/R/LAG/45976-80, dated 30<sup>th</sup> Dec 2022 requiring the comments on Licensee Proposed Modification of WAPDA (LPM). The LMP relates to addressal of audit paras pertaining to excessive energy consumptions as compared to NEPRA's allowed auxiliary consumption. In addition to above the enhanced outage hours in comparison to NEPRA's allowed outage hours in the petition of LPM.

- 2. The LPM based on the inquire committee's report has reviewed and it is observed;
  - that on one side the committee has recommended to increase the auxiliary consumption based on the installed capacity and on the other hand reduced the availability of the plants from one already approved by NEPRA.
  - it is pointed out by petitioner that the consumer will not be enhanced. Such a narration is against the tariff norms and calculations as extracting higher amount of energy by the plant and at the same moment further reducing the availability will enhance the tariff at both ends.
  - further the Authority powers are intended to be used to satisfy Audit objection by enhancing the non availability of plant and increased extraction of auxiliary power. This will simply result into increasing the consumer tariff.
- 3. The above comments are submitted for consideration please.

Regards,

Managing Director Punjab Power Development Board

<u>CC:</u>

1. PSO to Additional Chief Secretary, Government of the Punjab, Energy Department.



### PRIVATE POWER & INFRASTRUCTURE BOARD MINISTRY OF ENERGY (POWER DIVISION) GOVERNMENT OF PAKISTAN

No. 1(101) PPIB-MISC./22/PRJ/O-56862

Syed Mateen Ahmed Deputy Secretary (Tariff & Subsidy)/SO (Tariff) Ministry of Energy (Power Division) 2<sup>nd</sup> Floor, A-Block, Pak Secretariat Islamabad

14 January 2022 Fu uto en a p V.C. M. CRIRE - SA (Tech) M(CA/7)- SA(HYdro) m Clirs - SA (NEE) - m .7

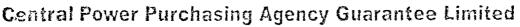
### Subject: <u>APPLICATION OF WAPDA FOR MODIFICATION IN ITS GENERATION</u> <u>LICENCE</u>

It refers to Power Division's Letter No. Tariff/XWDISCO's-2020-21 dated 4<sup>th</sup> January 2022 whereby a copy of NEPRA's letter No. NEPRA/R/LAG-23/45947-55 dated 30<sup>th</sup> December 2021 regarding application of WAPDA for its Licence Proposed Modification (LPM) in its Generation Licence has been enclosed for PPIB's views/comments.

2. The Proposed Modification in Generation License relates to (i) inclusion of 1530 MW Tarbela 5<sup>th</sup> Extension Hydropower Project in its Generation License which will increase the total installed capacity from 17367.96 MW to 18897.96 MW (ii) revise/actualize the Auxilary comsumption of its 24 Hydropower station from 13.7 MW to 24.2 MW in Schedule- II of its Generation License.

3. PPIB has reviewed the subject case and supports proposed LPM of WAPDA i.e inclusion of 1530 MW Tarbela 5<sup>th</sup> Extension Hydropower Project in its Generation License and revision in the auxilary comsumption from 13.7 MW to 24.2 MW for 24 number of Hydel Power stations with cmmulative capacity of 18897.96 MW as it seems reasonable being well below the auxilary consumption allowed by NERPA for other hydropower projects in Paksitan.

TA TT	With best regards,	D's Mi
	Jacan	Du 4 Addt Du DD 4 DO 4 AD 4 AD 41 AD 41 AD 40 AD 42 BO SES 74 OAA DO 9 Managing Director
č ⊂ CC N Sye		itional Director, Office of the Registrar, NEPRA Islamabad



A Company of Government of Pakistan



No. CEO (CPPA-G)/CTO/ 786

Chief Technical Officer (CPPA-G) Dated 13/ 21/2022

# Director Registrar office (NEPRA)

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

## Subject: APPLICATION OF WAPDA FOR MODIFICATION IN ITS GENERATION LICENSE

Reference to the application of WADPA for modification in its generation their generation license, following are the point that may kindly be kept in mind before modifying the generation license of WAPDA:-

1. The Technical committee Constituted by WAPDA to probe into the matter of additional usage of auxiliaries' consumption other than approved by the NEPRA in the Generation license.

The report submitted by Technical Committee pointed out metered/unmetered consumption of energy used by each power station, however proper justification of the losses along with the documentary evidence through firm technical justifications were not mentioned.

Therefore, Authority may kindly get confirmation from WAPDA that such losses or consumption are only consumed within the power plant and if not then WAPDA may give clarification, while keeping in view of all the Legal and Regulatory framework to justify such additional Auxiliary consumption.

Technical Audit from the third party need to be conducted for evaluating the auxiliary's consumption of each WAPDA Power station and to evaluate that such increase in auxiliaries' consumption of WAPDA Hydel Power Plants is because of lack of Operation & Maintenance of Power Plant or not.

