

**List of Issues**  
**framed for Hearing in the matter of the Application of LSG Hydro**  
**Power Limited (LSGHPL) for the Grant of Concurrence**

- (a). The power policy of the province of Khyber Pakhtunkhwa and the related Guidelines envisages a process for the award of project for semi-raw sites. Has PEDO complied with the same in letter and spirit including representation/input of various stakeholders in the process?
- (b). PEDO granted Letter of Intent (LoI) on certain terms and conditions and the review of same reveals that it will supply to National Grid only which is not consistent with the submissions of application indicating K-Electric Limited (KEL) and Bulk Power Consumer(s) [BPC(s)] as alternate to National Grid and therefore needs clarification.
- (c). The LoI of the project envisages updating the Feasibility Study at no risk and cost to, and without any obligation on part of Govt. of the province and its agencies. In view of the said, is there any case for project to go ahead for concurrence?
- (d). The project is being developed on the river of Spat Gah which is one of the tributaries of Indus River. In this regard, did the company approach Indus River System Authority (IRSA) for any approval etc. in terms of Section-14B(5) of the NEPRA Act?
- (e). Has the Feasibility Study duly considered the upstream/downstream projects? If the project of LSGHPL is executed, what will be impact on parameters of the project including energy yield, environmental impact and ecology as well as other projects or vice versa?
- (f). In its application, it is submitted that negotiation with prospective buyers including BPC(s), Industrial Zone(s) and KEL are in process. The Industrial Zone(s) and KEL are Supplier(s) of Last Resort and for the said, the regulatory regime requires the project to be optimized in the Indicative Generation Capacity Expansion Plan (IGCEP) and in the absence of same how this request can be considered?

- (g). In case the company intends to supply to BPC(s) then *prima facie* it will require amendment in Policy and Lol. Is PEDO willing to change the same?
- (h). The company has submitted the Grid Interconnection Study for the project however, the same has not been approved from NTDC. In the absence of same, how it can be ensured that it will comply with the connectivity standards in accordance with relevant provisions of the Grid Code?
- (i). In its application, the company has submitted that the total cost of the project will be USD 1,031 million which is based on assumption of supplying to the National Grid. What will be the financial model if it supplies to BPC(s)? Has the company carried out any financial analysis in such scenario(s) to comply with the requirements of Section-14B(5) of the NEPRA Act?
- (j). Whether the project is in compliance with the NEPRA (Electric Power Procurement) Regulations, 2022 or otherwise?
- (k). Any other issue with the approval of the Authority.