

Priority



GOVERNMENT OF PAKISTAN
MINISTRY OF ENERGY POWER DIVISION, ISLAMABAD



No.PIII3(2)/2009

Islamabad, the 23rd June , 2025

From

Syed Mateen Ahmed
Section Officer (Tarrif)

To

1- Registrar-1, NEPRA, Islamabad

SUBJECT: REQUEST FOR INTERVENTION AND DEFERRAL OF FCA DETERMINATION FOR K-ELECTRIC APRIL 2025

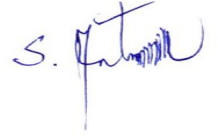
This is with reference to the notice of hearing published on the Authority's website on June 18th, 2025 in relation to scheduling of hearing on June 23rd, 2025 in relation to the request filed by K Electric Limited ("KE") for 'provisional' monthly fuel charges adjustment ("FCA") for the month of April 2025.

2. In this regard, the Authority's advertisement reveals that KE is seeking a **negative** FCA of **Rs. 4.69/kWh** (approximately Rs. 7.173 billion) for the month of April 2025. In contrast, consumers of XWDISCOs were charged a positive FCA positive of **Rs. 0.9306/kWh** for the same period, as stipulated in the determination dated June 05th, 2025 notified vide S.R.O. 1046(I)/2025. This significant variance arises primarily from the higher reference fuel cost of **Rs.15.9947/kWh** provisionally allowed to KE pursuant to the Authority's determination dated May 27, 2025 (the "**MYT Determination**"), in the matter of KE supply tariff under Multi Year Tariff regime for the period from FY 2023-24 to FY 2029-30. It is pertinent to note that the **provisional** FCA reference of Rs. 15.9947/kWh was initially determined by the Authority for the third quarter of the KE's previous MYT (January to March 2023), which is being continued by the Authority despite passage of almost two (02) years.

3. It is respectfully submitted that keeping in view the implication thereof, the Ministry of Energy (Power Division) as well as Central Power Purchasing Agency (Guarantee) Limited has filed review motions (the "**Motions**") against the MYT Determination to seek, *inter alia*, redetermination of the FCA references as per the applicable framework.

4. In these circumstances, proceeding with the FCA determination based on provisional reference, which are currently under review, may result in regulatory inconsistency, retrospective adjustments, and inequitable treatment of the consumers—contravening the principles of fairness, transparency, and due process enshrined in the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 and the NEPRA Tariff (Standards and Procedure) Rules, 1998.

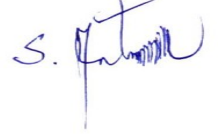
It is, therefore, most respectfully submitted that the Authority may defer its decision on KE's FCA petition for the month of April 2025 till the time that the Motions are decided and the FCA references are redetermined as per the applicable framework. This request is made in the interest of regulatory consistency, consumer equity, and to avoid premature or potentially unwarranted adjustments/ fiscal burdens.



Syed Mateen Ahmed
Section Officer (Tarrif)

Copy for information to:-

- 1- SO to Sectry, MOEPWD, Islamabad
- 2- Addl Secretary-II, MOEPWD, Islamabad
- 3- Joint Secretary (T&S), MOEPWD, Islamabad
- 4- Deputy Secretary (T&S), MOEPWD, Islamabad



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