



GOVERNMENT OF PAKISTAN
MINISTRY OF PLANNING DEVELOPMENT & SPECIAL INITIATIVES



No.42-10-ENERGY-PSE-PETITIONS-PC-2023

Islamabad, the 20th January, 2026

From

Kishwar Sultan Ali
Assistant Chief (EF&E)

To

1- Registrar-1, NEPRA, Islamabad

SUBJECT: THE NEPRA (PROSUMER) REGULATIONS, 2025

REGISTRAR OFFICE
Diary No. 1192
Date: 21-1-26

I am directed to refer to NEPRA's letter No.NEPRA/DG(Lic)/NMR-01/07-59 dated 2nd January, 2026 on the above cited subject and convey the comments on draft NEPRA (Prosumer) Regulations, 2025 as under for consideration by the Authority:

- i. Transition from net-metering to a net-billing framework results in surplus energy exports being credited at national average energy purchase price, which is significantly lower than applicable retail tariffs. This change would materially affect the economic returns of rooftop solar investments, particularly for small and medium consumers, and extends project payback periods. There is need to introduce a differentiated or time-of-use export tariff that better reflects peak demand value and avoided system costs;
- ii. Restricting installed generation capacity to the sanctioned load prioritizes self-consumption but limits system optimization and economies of scale. This may constrain larger residential and commercial installations that could otherwise contribute surplus clean energy to the grid. There may be a provision for installation of generation capacity to exceed sanctioned load by a defined margin subject to technical assessment by the concerned DISCO;
- iii. The cap on new prosumer connections once distributed generation reaches 80% of transformer capacity is intended to protect grid assets. However, in high-density solar areas, this may limit further adoption unless infrastructure upgrades are undertaken. The regulations may have a provision to allow conditional approvals beyond the 80% threshold where voltage regulation, protection systems, or feeder upgrades are implemented. There is also need to establish a transparent roadmap for transformer and feeder augmentation in high-demand areas, aligned with growing distributed generation; and
- iv. The combined effect of reduced export compensation, capacity constraints, and agreement uncertainty may encourage consumers to shift toward off-grid or battery-dominant systems. While this can reduce stress on distribution assets, it may also limit renewable energy exports to the grid and reduce overall system utilization. Regulations may be structured to encourage grid-connected solutions that maximize renewable energy integration while ensuring system reliability.

NEPRA
Licensing Department
Diary No. 456
Date: 22-1-26

Forwarded please:

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

21-01-26

Kishwar Sultan Ali
Assistant Chief (EF&E)



GOVERNMENT OF PAKISTAN
MINISTRY OF PLANNING DEVELOPMENT & SPECIAL INITIATIVES



No.42-10-ENERGY-PSE-PETITIONS-PC-2023

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- iv. The combined effect of reduced export compensation, capacity constraints, and agreement uncertainty may encourage consumers to shift toward off-grid or battery-dominant systems. While this can reduce stress on distribution assets, it may also limit renewable energy exports to the grid and reduce overall system utilization. Regulations may be structured to encourage grid-connected solutions that maximize renewable energy integration while ensuring system reliability.

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Kishwar Sultan Ali
Assistant Chief (EF&E)



Date: January 14, 2026

Reference No: IPS/Ch/02/2026

The Registrar,
National Electric Power Regulatory Authority (NEPRA),
Islamabad.

Subject: Recommendations on the Draft NEPRA (Prosumer) Regulations, 2025

The Institute of Policy Studies (IPS) formally submits its recommendations on the Draft NEPRA (Prosumer) Regulations, 2025, in response to NEPRA's public consultation. IPS (www.ips.org.pk) has been deeply engaged in analyzing Pakistan's economic structure and actively contributes to policy discussions and continues to advocate for a balanced, inclusive, and sustainable energy transition.

This submission, prepared by IPS' Working Group on Energy, Climate, and Water, is offered in a constructive spirit, recognizing NEPRA's responsibility to safeguard grid stability, ensure the financial viability of distribution companies, and maintain fairness across consumers. It responds to the proposed transition from net metering to net billing, which has emerged amid mounting fiscal and operational pressures within the power sector.

IPS acknowledges that net metering has played a facilitative role in accelerating rooftop solar adoption, delivering benefits such as reduced electricity costs for prosumers, localized generation, lower transmission and distribution losses, partial peak demand relief, fuel savings, and progress toward climate commitments. At the same time, IPS notes that the challenges now attributed to net metering are rooted in deeper, long-standing structural weaknesses, including distribution inefficiencies, demand stagnation, fixed capacity payment obligations, and infrastructure constraints.

Accordingly, this document serves two interlinked purposes. First, it presents practical and equitable recommendations, if undertaken, to ensure that any transition to net billing is implemented in a fair, orderly, and predictable manner. Second, it underscores that regulatory adjustments to prosumer arrangements are, at best, short-term interventions and cannot substitute for comprehensive power sector reforms.

The document contains two parts. Part I comprises recommendations, i.e., introducing a transparent fixed system charges for prosumers, providing a transitional adjustment period, incentivizing distributed energy storage, gradual phase-in of export purchase rates, and allowing flexible system sizing. Part II of this document outlines parallel measures required to address systemic inefficiencies and ensure long-term financial and operational sustainability of the power sector.

IPS remains committed to non-partisan, evidence-based engagement in support of Pakistan's national interest and appreciates the opportunity to contribute to this important regulatory process.

Regards,

Khalid Rahman,
Chairman, IPS

Forwarded please:

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

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Date: 16.1.26
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Licensing Department
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Institute of Policy Studies
Islamabad

Recommendations on the Draft NEPRA (Prosumer) Regulations, 2025

January 14, 2026

Prepared by IPS Working Group on Energy, Climate, and Water

This document is a submission of recommendations on the Draft NEPRA (Prosumer) Regulations, 2025, in response to NEPRA's public consultation.

Introduction and Context

The Net Metering Regulations, 2015, were introduced as a facilitative policy instrument to promote the adoption of distributed renewable energy by allowing consumers to offset their electricity bills through the export of surplus rooftop solar generation to the grid. The primary objective of the framework was not to create a commercial profit-making opportunity, but rather to enable consumers to partially shield themselves from rising electricity costs while maintaining access to grid supply when required. In effect, the grid functioned as a virtual storage mechanism for prosumers.

Since their introduction, these regulations have played an important role in rooftop solar adoption. However, net metering was not the sole or primary driver of this growth. Rapidly declining global solar module prices, rising grid tariffs, supply reliability concerns, and broader macroeconomic pressures collectively made rooftop solar an increasingly viable alternative for consumers. Net metering served to amplify this trend.

The facilitative structure of the net-metering framework created an environment in which both prosumers and the system benefited. While Prosumers were able to reduce their electricity bills and recover investments within relatively short timeframes by effectively using the grid as a battery, the power system benefited from localized generation, including reductions in transmission and distribution losses, improved voltage profiles, eased pressure during peak demand hours, created employment, reduced fuel imports, and contributed to the country's broader climate commitments.

As with any enabling policy introduced to catalyze early-stage adoption, the expansion of net metering also revealed operational challenges and system constraints over time. While these challenges are indicative of policy lacunas, they also reflect the natural evolution of a framework as penetration levels increase. The national grid, originally designed for one-way power flows, began to experience technical constraints, while the continued application of high export valuations under net metering increasingly shifted fixed system costs onto non-producing consumers. Addressing such emerging distortions requires periodic regulatory recalibration and system upgrades to ensure fairness, reliability, and financial sustainability. The introduction of abrupt changes limits the expected benefits.

In this context, the proposed transition from net metering to net billing can serve as a short-term measure to stabilize the power system. However, achieving sustainability requires the simultaneous implementation of complementary reforms aimed at addressing underlying structural challenges, including inefficiencies within DISCOs, system upgrades, and demand-side growth. When short- and long-term measures are pursued in parallel, both consumers and the power system will benefit, while prosumers are less likely to perceive the transition as a withdrawal of government support for distributed generation, and instead as a corrective step toward ensuring the sustainability and financial viability of the power sector.

In this context, the central policy challenge, therefore, is not whether reform from net-metering to net-billing is necessary, but how it can be designed and implemented in a manner that sustains mutual benefits for prosumers, non-solar consumers, and distribution companies alike.

Part I: Recommendations

In light of the above, the following recommendations are proposed to support a balanced and sustainable transition from net metering to net billing:

1. Introduce Transparent Fixed System Charges for Prosumers

Regulation Reference: *Regulation 14 (Billing), "net billing arrangement" means an arrangement under which electricity generated by a distributed generation facility of prosumer is purchased by the licensee and the licensee raises the bill on the prosumer for his consumption at the applicable tariff, after giving credit for electricity supplied by prosumer to the licensee at the national average energy purchase price."*

Recommendation Rationale: The draft regulation establishes net billing with exports credited at the National Average Energy Purchase price (NAEPP) while imports are billed at full retail tariffs. This valuation gap discourages efficient solar sizing and investments and can also erode prosumer trust amid 'perceived penalties.'

Recommendation: Instead of implicitly recovering unavoidable fixed system charges (system maintenance, capacity payments, T&D Losses, etc.), a clearly defined and reasonable fixed charge should be introduced for prosumers to recover these unavoidable system costs. Charging these costs transparently rather than implicitly through suppressed export prices will enhance trust, improve compliance, and ensure equity between prosumers and non-prosumers. A direct fixed charge promotes cost-reflective tariffs, ensuring prosumers contribute equitably to the grid. This also reflects global practice. For instance, California's NEM 3.0 uses \$15/month fixed fees to stabilize revenues, rebounding solar installations by 15% post-transition.

2. Provide a Transitional Adjustment Period Before Implementation

Regulation Reference: *Regulation 1(2), "They shall come into force at once..."* meaning the regulations take effect immediately upon notification in the official Gazette, without a built-in buffer for adaptation.

Recommendation Rationale: Immediate implementation could lead to abrupt shifts for prosumers and DISCOs. While Regulation 5(1)(a) allows licensees to use "*a standard meter capable of registering the flow of electricity or two separate meters,*" there is no specific directive to accelerate smart meter deployment or infrastructure readiness.

The application process in Regulation 3 focuses on quick timelines (e.g., 15 days for initial review and commissioning) but assumes existing infrastructure, without mandating upgrades during a transition. Moreover, abrupt changes can extend solar payback periods from 3-5 years to 7+ under low export rates, deterring investments and causing a "death spiral" where reduced adoption worsens utility revenues.

Recommendation: A transition period of at least 5–8 months should be provided before the complete implementation of net billing. This will allow existing and prospective prosumers to make informed decisions and adapt accordingly. During this period, DISCOs can accelerate the deployment of 'standard meters' and supporting infrastructure to ensure operational readiness, as DISCOs have yet to implement SCADA and AMI systems widely. In areas with high solar density, issues like overvoltage and transformer burnouts are a concern because existing infrastructure limits are not being monitored actively.

Given Pakistan's still modest level of rooftop solar penetration, a gradual approach can help preserve economic activity, maintain investor confidence, and support a stable adjustment for all stakeholders.

3. Incentivize Distributed Energy Storage, Particularly for Small and Medium Consumers

Recommendation Rationale: Battery's upfront cost is very high, posing a barrier for low-middle-income consumers, particularly. This extends solar paybacks under net billing's low export rates. Subsidies/financing (e.g., 20-30% rebates or low-interest loans) boost self-consumption, cutting bills 20-40% and avoiding "abrupt withdrawal" of incentives. Moreover, storage shifts solar output to evenings, reducing both midday exports and peak demand, easing transformer overloads and T&D losses.

Recommendation: Encourage battery adoption to reduce excessive exports to the grid, improve self-consumption, and mitigate system stress. Targeted support, such as partial capital subsidies or concessional financing, can be considered for low- and middle-income households to address high upfront costs. This approach balances system interests while avoiding abrupt withdrawal of incentives. For example, Australia subsidized batteries for 50,000 homes to reduce system stress.

4. Grandfathering for Existing Prosumers

Regulation referenced: Regulation (1) (2) & (3), "*The...Net Metering Regulations, 2015, shall stand repealed upon coming into force of these regulations...Provided that distributed generators having the valid agreements executed under the repealed regulations shall be billed in accordance with the national average power purchase price till the expiry of the term of their agreement, and thereafter shall be billed in accordance with the national average energy purchase price for all future renewals. (3) Upon expiry of the term of the agreement executed under the repealed regulations, any extension in the agreement shall be in accordance with these regulations and the arrangement will be brought in conformity with these regulations.*"

Regulation 21 (Savings and Repeal, inferred from context and standard practice) provides partial/limited grandfathering for existing net-metering users. However, no explicit long-term protection or voluntary opt-in is stated. Immediate effect per Reg 1(2) applies the new rules broadly, risking retroactive impacts on ongoing investments.

Recommendation Rationale: Retroactive changes erode confidence, stalling installs and jobs in the solar sector. Additionally, existing users are already fully integrated in the system; abrupt changes would prompt mass modifications, straining Reg. 3 processes and 80% transformer caps.

Recommendation: Full grandfathering under the 2015 Net Metering Regulations for the original contract term (7-10 years) builds lasting policy credibility, reassuring not only current prosumers but also future investors under net billing. In this regard, it is recommended to offer modest voluntary incentives for early transition to net billing (e.g., one-time bill credits, priority battery rebates, or enhanced export adders for 1-2 years) to accelerate grid alignment while maintaining equity and momentum toward Vision 2030.

5. Gradual Phase-In of Export Purchase Rates

Regulation Referenced: *Regulation 14, sub-regulation, "net billing arrangement" means an arrangement under which electricity generated by a distributed generation facility of a prosumer is purchased by the licensee and the licensee raises the bill on the prosumer for his consumption at the applicable tariff, after giving credit for electricity supplied by prosumer to the licensee at the national average energy purchase price."*

Recommendation Rationale: Phasing export rates, down to NAPP over 1-2 years, with temporary highs for small residential and commercial users (having a system of <10–50 kW), allows adaptation while preserving 4-5year paybacks vs 7+ years under immediate cuts. Moreover, phasing export rates minimizes disruptions and corrects subsidies gradually. A sudden drop in avoided costs will deter investments, extend paybacks, and cause market contraction, worsening cross-subsidies and circular debt issues. Phasing eases this, ensuring sustained growth.

Recommendation: Rather than an immediate shift to avoided-cost pricing, export rates may be phased down over a period of 1-2 years, beginning with a mid-level buyback rate. Higher export rates may be temporarily retained for small residential and commercial systems to preserve investment viability. This gradual adjustment reduces market disruption while steadily correcting cross-subsidies.

6. Allow Flexible System Sizing within Defined Technical Limits

Regulation Referenced: *Regulation 3(2), "The capacity of a proposed distributed generation facility shall not exceed the sanctioned load of the applicant's premises."* with a provision allowing NEPRA to revise this at any time. However, there's no built-in flexibility for factors like future loads, such as EVs, or alignment with NDC 3.0 (Pakistan's updated Nationally Determined Contributions under the Paris Agreement, targeting 60% RE and 30% EV adoption by 2030).

Recommendation Rationale: Strict limits ignore 20-30% solar derating from heat/dust (efficiency drops to 70-80% in Pakistan's climate), leading to undersized systems and lost savings (paybacks extend 1-2 years). Reg. 3(3) requires load flow studies for >250kW systems, and Reg. 3(5) caps at 80% transformer capacity, but these are restrictive without provisions for oversizing buffers or EV

Part II: Structural Challenges of Pakistan's Power Sector

This annexure outlines the broader structural challenges underlying the financial and operational stress currently faced by Pakistan's power sector. While the recommendations presented above focus on facilitating an orderly and equitable implementation of the proposed Prosumer Regulations, 2025, the issues discussed below represent longer-term reform priorities that should complement any changes to prosumer arrangements.

Addressing these underlying structural factors is essential for achieving durable affordability, financial sustainability, and energy security. Regulatory measures that operate primarily as short-term adjustments, if not accompanied by deeper reforms, risk generating new distortions over time and may necessitate further regulatory revisions. Such regulatory volatility can undermine investor confidence and discourage sustained commercial and economic activity.

Accordingly, while considering the implementation of net billing regulations, these measures must be situated within a broader reform framework that addresses the following systemic issues in parallel:

a) Distribution Sector Inefficiencies

DISCOs' inefficiencies remain central to sectoral stress. T&D losses averaged 17.6% in FY 2024-25 (down from 18.3% in FY 2023-24, but still exceeding NEPRA's 11% target), contributing PKR 265 billion in losses. Recovery rates claimed to have improved to 96.6% (from 92.4%), yet under-recoveries stand at PKR 132 billion during FY 2024-2025. On the other hand, there are governance challenges, including politicization and theft, that exacerbate circular debt and limit DISCOs' ability to invest in upgrades or debt servicing.

Recommendation: Corporatize and selectively privatize DISCOs; deploy AI-driven smart metering nationwide (reducing losses 10-15%); and enforce performance-based incentives with third-party audits in DISCOs. Without these, net billing provides only temporary relief without addressing systemic bleeding.

b) Capacity Payment Obligations: Increasing Demand

Capacity payments constitute a huge share of Pakistan's power cost. Capacity charges collected annually amount to PKR 2.2 trillion, highlighting a huge burden on the system and consumers alike, ultimately contributing to stagnant demand and underutilized assets. For instance, with an installed generation capacity of 40 GW, the power utilization remains below sixty percent. Low industrial activity and affordability constraints undermine demand growth, spreading fixed costs over a shrinking base.

Recommendation: Expand demand through industrial revival, electrification of transport (e.g., EVs), and improved reliability of the system by reducing outages and losses; improve grid attractiveness by enhancing service quality and recovery to boost power utilization. Moreover, to ensure substantive outcomes, the process of renegotiation of the IPPs contracts must now be advanced with consistent commitment, institutional coherence, and sustained resolve.

c) Transmission Constraints and Delayed Infrastructure Upgrades

Constraints in transmission capacity continue to restrict the efficient utilization of low-cost renewable generation resources. Delays in transmission expansion and modernization exacerbate congestion, increase reliance on expensive generation, and limit system flexibility. Investments in grid reinforcement, digitalization, and system planning are essential to improving dispatch efficiency, reducing overall system costs, and enabling a smoother transition toward a more diversified energy mix. Currently, overloaded 500 kV lines force reliance on RLNG plants. On the other hand, due to the lack of utilization of available renewable power, compensation amounts on account of Non-Project Missed Volume (NPMV) are also paid to WPPs.

Recommendation: Accelerate HVDC upgrades and digitalize with SCADA for real-time dispatch. Additionally, use advanced technologies to optimize power flows and reduce congestion, such as IoT for predictive maintenance to detect faults before blackouts, and AI to forecast loads, balancing RE variability.

d) Net Billing as a Transitional Measure

In this broader context, the proposed transition from net metering to net billing should be understood as a measure aimed at relieving immediate distributional and financial pressures. While it may help address certain concerns in the short term, it cannot, on its own, resolve structural inefficiencies or restore long-term financial sustainability. Durable outcomes will depend on integrated reforms across governance, infrastructure investment, demand-side development, and market design.

Conclusion

Concisely, by integrating transparent cost recovery, phased implementation, targeted incentives, and technological enablement alongside improvements in DISCO efficiency and necessary grid and transmission upgrades, NEPRA can ensure that rooftop solar continues to expand in a manner that is financially sustainable, socially equitable, and aligned with the country's long-term energy and climate objectives.

-----The End-----

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For kind information, please:

☒ Chairman ☒ 2. M (Tech)
☒ 3. M (Law) ☒ 4. M (Dev)

RECEIVED OFFICE
 Date: 15.1.26
 939

Date: 13 January, 2026

To,
 The Registrar,
 National Electric Power Regulatory Authority (NEPRA),
 NEPRA Tower, Attaturk Avenue (East), G-5/1,
 Islamabad.

Subject: Comments and Objections regarding the Draft NEPRA (Prosumer) Regulations, 2025

Dear Sir,

We, Siddiq Renewable Energy (Pvt) Ltd, a registered member of the Pakistan Solar Association (PSA) and a stakeholder in the renewable energy sector, hereby submit our formal response to the Draft Prosumer Regulations, 2025.

While we acknowledge the need for grid stability, we believe the current draft contains several provisions that will dismantle the solar industry, discourage private investment, and penalize citizens for adopting clean energy. Our specific objections are as follows:

1. Disparity in Export Rates (Net Billing Model)

The proposed transition to a "Net Billing" model using the National Average Energy Purchase Price (NAPP)—estimated at Rs. 11.30/kWh—is economically unviable.

- The Issue: Charging prosumers ~Rs. 60/kWh for imports while paying them ~Rs. 11/kWh for exports creates a 500% price gap.

Our Demand:

2. Arbitrary Capacity and Transformer Caps

- 100% Sanctioned Load Limit: Restricting system capacity to 100% of the sanctioned load ignores future electrification (EV charging, heat pumps etc.). We recommend restoring the 150% (1.5x) buffer to allow for future-proofing households.

Our Demand:

- 80% Transformer Capacity: Barring new solar connections once a transformer reaches 80% capacity penalizes late adopters due to the utility's (DISCO) failure to upgrade infrastructure.

Our Demand:

3. Reduction in Agreement Term (5 Years)

- The Issue: Reducing the contract duration from 7 years to 5 years creates immense uncertainty for financiers and consumers (For example ROI). No other power generation contract in Pakistan is as short as 5 years.

Our Demand:

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 P.O Box: Lahore-54900 (Pakistan)

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NEPRA
 Licensing Department
 Date: 16-1-26
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[Company letterhead]

SIDDIQ RENEWABLE ENERGY(Pvt)Ltd.

(A Siddiq Shafi Group Company)

Solar PV and Solar Thermal Solution Provider

4. Mandatory Licensing for Small-Scale Systems

- The Issue: Requiring a NEPRA license for systems under 25 kW adds unnecessary bureaucratic hurdles and costs for residential users.

Our Demand:

5. Protection of Future Consumers

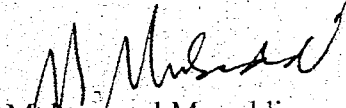
The Issue: The draft remains vague on the transition of existing prosumers after their current 7-year terms expire. This shift from net-metering to net-billing will reduce the system's transparency and equality for new solar users.

- Our Demand:

Conclusion

The 2025 Draft Regulations, in their current form, protect the inefficiencies of DISCOs at the cost of the Prime Minister's "Clean Green Pakistan" vision. We urge NEPRA to hold a consultative workshop with all the stakeholders including Pakistan Solar Association (PSA) to revise these points before final notification.

Sincerely,



Muhammad Musaddiq

C.E.O

Siddiq Renewable Energy Pvt Ltd,

47-Grand Trunk Road, Hide Market.

P.O Box: Lahore-54900 (Pakistan)

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OFFICE OF THE
DIRECTOR GENERAL (MIRAD)
FESCO, FAISALABAD

No. 7360 /

Dated: 09 / 01 / 2026

REGISTRAR OFFICE
Diary No: 932
Date: 15.1.26

Registrar

National Electric Power Regulatory Authority

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

SUBJECT: THE NEPRA (PROSUMER) REGULATIONS, 2025

Reference: - Your office letter No. 07-59 dated 02-01-2026

With reference to the subject matter, FESCO has thoroughly reviewed the draft NEPRA (Prosumer) Regulations, 2025 (the *Prosumer Regulations*) circulated for public comments. After detailed examination, FESCO's comments and observations on the proposed draft of the *Prosumer Regulations, 2025* are enclosed herewith for consideration.

FESCO remains committed to extending its full support to NEPRA in refining the *Prosumer Regulations, 2025*, keeping in view practical implementation aspects and the evolving requirements of the power sector.

DA/As Above

ENGR. ABID RASHID

Director General (MIRAD) FESCO

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTBCM)

For kind information please,

Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 417
Date: 16-1-26

FESCO's Comments on NEPRA's Draft (Prosumer) Regulations-2025

Sr. No.	Regulation No.	NEPRA's Draft	FESCO's Comments
01.	2 (Definitions) (i)	"Distributed generation facility" means a facility set up by a prosumers using solar , wind or biogas energy resources for generation of electricity up to 1 MW	It should be capped 5 KW to 1 MW.
02.	3 (Application process for interconnecting distributed generation facility)	Sub Regulation-(5) Provided further that the licensee shall not entertain any application if the distributed generation capacity connected to a particular distribution transformer has reached 80% of its rated capacity.	It is more appropriate that the addition of feeder-level and grid station-level hosting capacity limits may also be considered in addition to transformer capacity.
03	Schedule -II	Generation Type(check one) 1. Single Phase 2. Three Phase	Provision of Three Phase (On Grid) only



Mr. Waseem Anwar Bhinder,
Registrar,
National Electric Power Regulatory Authority (NEPRA),
Attaturk Avenue (East), Sector G-5/1,
Islamabad.

Ref # KE/RA&GR/NEPRA/2026/028
January 14, 2026

SUBJECT: KE's COMMENTS ON DRAFT NEPRA (PROSUMER) REGULATIONS, 2025

Dear Sir,

This is with reference to the notice published on NEPRA's website inviting stakeholder comments on the draft NEPRA (Prosumer) Regulations, 2025 ('the draft Regulations').

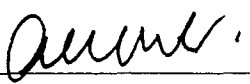
In this regard, KE extends its sincere appreciation to all the stakeholders including NEPRA, for the ongoing sector reforms which also includes some key revisions to the net metering regime while incentivizing renewable integration into the system through setting up of distributed generation facilities by prosumers.

Enclosed herewith, as **Annexure A**, are KE's comments on the draft Regulations, for kind consideration of the Honorable NEPRA Authority and considering the significance of the matter, KE humbly requests NEPRA for a consultative session/hearing of all stakeholders to discuss and deliberate on the draft Regulations prior to their finalization and approval.

Furthermore, it may please be noted that KE reserves the right to raise additional comments in the future including at the time of/during hearing or consultation process in the matter.

We trust that the Honorable NEPRA Authority will give due consideration to our comments.

Sincerely,


Muhammad Imran Qureshi
Chief Regulatory Affairs &
Government Relations Officer

REGISTRAR OFFICE
Diary No: 925
Date: 15.1.26

Encl: Annexure A

Forwarded please:

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<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/REG)

For kind information, please.

☒ Chairman 2. M (Tech)
☒ 3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No: 925
Date: 16-1-26

K-Electric Limited
39-B KE House Sunset Boulevard, DHA- Phase 2, Karachi,
Pakistan

Comments on Draft NEPRA (Prosumer) Regulations, 2025

KE's comments on the draft NEPRA (Prosumer) Regulations, 2025 ('the draft Regulations') are detailed below for kind consideration of the Honorable NEPRA Authority.

S. No.	Regulation	As per draft NEPRA (Prosumer) Regulations, 2025	KE Comments
1.	2(e)	(e) "applicant" means a 3 phase 400V or 11kV domestic, commercial, industrial, agricultural, general services consumer or a single point bulk supply consumer of a licensee, which submits an application to interconnect its proposed distributed generation facility to the distribution system of the licensee and who applies for the accord of concurrence to operate a distributed generation facility as a prosumer;	<p>With regard to the subject draft regulation, KE understands that net metering applicants even with sanctioned loads of less than 5kW shall be provided with ToU connections/meters and billed accordingly.</p> <p>Hence, it is humbly requested that necessary clarification be provided in the Prosumer Regulations 2025 accordingly.</p>
2.	3(2)	The capacity of a proposed distributed generation facility shall not exceed the sanctioned load of the applicant's premises	<p>In view of the proposed revision, upon expiry of the existing agreements under the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015 ('Net-Metering Regulations, 2015') and once the Prosumer Regulations 2025 take effect, KE understands that prosumers will be granted a transition period within which they must align their DG capacity with sanctioned load by either reducing their PV/connected capacity equal to their sanctioned load, or increasing their sanctioned load to match the capacity of DG facility.</p> <p>Furthermore, it is humbly highlighted that while the proposed cap of size of DG facility being equal to the sanctioned load of the applicant may limit installation of oversized DG systems, the risk of over-voltage from excessive exports still persists. Therefore, KE respectfully proposes that export capacity be limited to a maximum of 25% of sanctioned load, in line with prudent international practices such as in South Africa, to ensure fair access and protect network stability.</p>
3.	3(3)	An applicant proposing to install a distributed generation facility with an installed capacity of 250 KW or above shall be obligated to conduct and submit a load	<p>It is humbly requested that the regulation should specify relevant Codes of Pakistan Engineering Council (PEC). This will ensure that such interconnection studies are carried out by</p>

S. No.	Regulation	As per draft NEPRA (Prosumer) Regulations, 2025	KE Comments
		flow study carried out through the licensee or any reputable consultant registered with Pakistan Engineering Council.	appropriately qualified PEC registered consultants possessing the relevant codes. Furthermore, it may be added that <u>submission of load flow study is required to be strictly adhered to by the applicant/consultant</u> . Failure to comply will entitle the licensee to take necessary measures as deemed appropriate, including but not limited to rejection of net metering application, discontinuation of net metering benefit, etc.
4.	3(5)	Provided further that the licensee shall not entertain any application if the distributed generation capacity connected to a particular distribution transformer has reached 80% of its rated capacity.	It is humbly submitted that the <u>80% Distribution Transformer (DT) limitation requires technical justification as over-voltage issues arise even below this threshold</u> . KE humbly proposes that <u>NEPRA may engage a consultant to evaluate methodologies and prudent practices for assessing Distributed Generator hosting capacity at the DT and feeder levels</u> . Further, KE understands that the 80% threshold shall be calculated as follows: <u>$\text{Rated Capacity of DT (kVA)} \times \text{Power Factor of 0.9}$</u> <u>for conversion from kVA to kW x 80%</u> Moreover, reference is made to Regulation 12(2) of the draft Regulations, whereby it is understood that once a distribution transformer has reached the 80% threshold, any further application <u>shall only be considered upon payment by the applicant</u> of any costs reasonably incurred by the licensee in providing, operating, or maintaining interconnection facilities and distribution system improvements required.
5.	3(11)	The licensee shall install and commission the proposed interconnection facility <u>within fifteen working days of the payment of demand notice by the prosumer</u>	It is humbly submitted that the prescribed timeline of fifteen working days for installation and commissioning of the interconnection facility may be <u>operationally challenging for the licensee</u> , given the dependencies on factors such as site readiness, customer coordination, meter availability and programming, system configuration, internal approvals processes, etc. In view of the foregoing, it is humbly requested that the commissioning timeline be <u>revised to thirty (30) working days</u> to provide a more practical and implementable window.

ANNEXURE A

KE letter # KE/RA&GR/NEPRA/2026/028

Dated: January 14, 2026

S. No.	Regulation	As per draft NEPRA (Prosumer) Regulations, 2025	KE Comments
6.	4(1)	Notwithstanding anything contained in the applicable documents, a prosumer shall seek concurrence of the Authority in accordance with sub-regulation (2): <u>Provided that the prosumer shall be required to obtain a fresh concurrence from the Authority prior to any modification in the technical parameters of the distributed generation facility.</u>	The subject regulation does not indicate any capacity threshold for seeking concurrence of the Honorable NEPRA Authority. KE therefore humbly seeks clarity on whether any minimum threshold similar to the current 25 kW requirement will continue to apply under the new regulations.
7.	5 (2)	A licensee may limit the operation and/or disconnect or require the disconnection of a distributed generation facility from its distribution system at any time, with or without notice, <u>in the event of fault.</u>	It is humbly requested that, in addition to fault scenarios, the licensee may be permitted to <i>"limit the operation and/or disconnect or require the disconnection of a distributed generation facility from its distribution system at any time, with or without notice"</i> for the purpose of network demand response and network stability management. This includes scenarios where the licensee may be allowed to temporarily curtail or limit export in cases where excess export from the prosumer may adversely affect the network parameters such as system voltage.
8.	5(3)	A licensee may also limit the operation and/or disconnect or require the disconnection of <u>distributed generation facility from its distribution system upon the provision of thirty days written notice for the conditions which include as follows:</u> <ul style="list-style-type: none"> a) to allow for routine maintenance, repairs or modifications to the distribution system of the licensee; b) upon licensee's determination that distributed generation facility is not in compliance with these regulations; and c) upon termination of the agreement or expiry of the term of the agreement. 	It is respectfully submitted that, KE has observed several instances where net-metering consumers have unauthorizedly enhanced or modified their <u>DG capacity without prior notification or approval from the licensee.</u> In such cases, KE's prevailing practice is to immediately temporarily suspend the net-metering/export benefit, followed by a 30-day notice to the consumer for submission and approval of requisite modification/regularization. Upon satisfactory compliance within the stipulated time period, the net metering benefit is restored accordingly. Hence, it is recommended that the regulations should allow licensee to immediately stop the net metering benefit upon issuance of written notice by the licensee to the prosumer. Further, KE humbly seeks clarification on the scope of the term "disconnection" under the subject regulation.
9.	7 (1)	The term of the agreement between prosumer and licensee shall be five years with effect from date of commissioning of distributed generation facility.	With regard to the subject regulation, it is humbly requested that in case of change in ownership of the DG facility, a mechanism be included in these regulations for required modification in the

ANNEXURE A

KE letter # KE/RA&GR/NEPRA/2026/028

Dated: January 14, 2026

S. No.	Regulation	As per draft NEPRA (Prosumer) Regulations, 2025	KE Comments
			generation license / concurrence approved by the Honorable NEPRA Authority.
10.	7(2)	At the expiry of the initial term, the agreement may be renewed between the prosumer and the licensee for another term of five years and so on with mutual consent of the licensee and prosumer.	KE respectfully seeks clarity from the Honorable NEPRA Authority on whether, upon renewal of the agreement between the prosumer and the licensee, the prosumer will also be required to <u>apply for renewal of concurrence from NEPRA.</u> <u>If so, a mechanism for the same be provided in these regulations.</u>
11.	9(2)	The prosumer shall be responsible for the installation of equipment, including, without limitation, electrical lines or circuits, transformers, switch gear, safety and protective devices, meters or electrical plant, to be used for interconnection; Provided that, if the prosumer is unable to install equipment, including, without limitation, electrical lines or circuits, transformers, switch gear, safety and protective devices, meters or electrical plant, used for interconnection, the licensee may execute the requisite work in case the prosumer offers to deposit the cost to be incurred on the requisite work at mutually agreed terms.	KE respectfully submits that, in order to uphold <u>safety and compliance standards</u> , the <u>prosumer shall bear responsibility solely for the procurement or payment of equipment required for interconnection.</u> This includes, without limitation, electrical lines or circuits, transformers, switchgear, safety and protective devices, meters, or other electrical plant, to be used for interconnection. <u>The installation, however, shall be undertaken exclusively by the licensee or by a PQC duly approved by the licensee.</u>
12.	9 (4)	The prosumer will furnish and install a <u>manual disconnect device that has a visual break to isolate the distributed generation facility from the distribution facilities.</u>	KE humbly requests that the subject regulation may <u>allow automatic or remote-operable disconnect devices</u> as well, which shall provide flexibility and enable safe and timely isolation.
13.	10 (1)	The prosumer shall not operate such equipment that superimposes upon the distribution system a voltage or current that interferes with licensee's operations, service to its consumers, or communication facilities.	In addition to the given regulation, it is respectfully requested that this clause also explicitly requires prosumers (<i>those with higher system sizes such as above 250 kW</i>) to maintain power factor, harmonics etc. at Point of Common Coupling (PCC). In case of interference with licensee's operation, the licensee may limit the operation and/or disconnect or require the disconnection of a distributed generation facility from its distribution system.
14.	13 (1)	The equipment installed for metering shall be capable of accurately measuring the flow of electricity in two directions.	KE requests that AMR/smart meters be made mandatory for Net Metering connections.
15.	13(3)	The meter reading shall be carried out preferably through handheld units (HHU) and	With regard to the subject regulation, it is proposed to amend / modify as follows to provide

S. No.	Regulation	As per draft NEPRA (Prosumer) Regulations, 2025	KE Comments
		through automated means as directed by the Authority from time to time.	<p>clarity and avoid duplication of effort and for operational efficiency.</p> <p><i>"The meter reading shall be carried out preferably through handheld units (HHU) or and through automated means as directed by the Authority from time to time."</i></p>
16.	19	The Authority may by general or special order, for reasons to be recorded in writing, after giving an opportunity of hearing to the persons likely to be affected, may relax any of the provisions of these regulations on its on motion or on an application made before it by an interested person.	<p>It is humbly submitted that such broad relaxation power provided under this clause may lead to unequal treatment of similarly placed prosumers, as it allows case-specific deviations without defined criteria. This may not align with the principle of non-discriminatory, fair and equitable treatment of prosumers as provided under Regulation 11 of the NEPRA Consumer Eligibility Criteria (Distribution Licensees) Regulations, 2022, and could create implementation and grievance-handling challenges for the licensee.</p> <p>Moreover, the possibility of legal challenges on grounds of discrimination or unequal treatment cannot be ruled out, as prosumers could claim that they are being discriminated against. This will also lead to high level of legal risk as those affected with discriminatory behavior would end up challenging the Honorable NEPRA Authority's decision before the competent court of law which would eventually increase their legal cost and it may cause unnecessary delay in the process. Further, this may also lead to confusion for setting up inconsistent precedents.</p> <p>KE therefore humbly requests that such relaxations, if considered necessary, may be more appropriate when exercised through clearly defined, objective and uniformly applicable parameters, rather than discretionary case-to-case approvals.</p>
17.	Schedule-I (7)	Applicant shall permit Licensee's employees and agents to enter the property on which the DG Facility is located at any reasonable time for the purposes of inspecting and/or testing Applicant's DG Facility to ensure its continued safe and satisfactory operation and the accuracy of	<p>KE humbly requests that the regulation explicitly states that no inverter setting modification may be undertaken without licensee's prior approval, to ensure safety and operational compliance.</p> <p>Accordingly, the said regulation is proposed to be amended as follows:</p>

ANNEXURE A

KE letter # KE/RA&GR/NEPRA/2026/028

Dated: January 14, 2026

S. No.	Regulation	As per draft NEPRA (Prosumer) Regulations, 2025	KE Comments
		Licensee meters. Such inspections shall not relieve Applicant from its obligation to maintain the DG Facility and any related equipment owned by Applicant in safe and satisfactory operating conditions. Licensee shall have the right to witness any testing by Applicant of the DG Facility.	<i>"Applicant shall permit Licensee's employees and agents to enter the property on which the DG Facility is located at any reasonable time for the purposes of inspecting and/or testing Applicant's DG Facility to ensure its continued safe and satisfactory operation, accuracy of Licensee meters and that no modifications especially in inverter settings has been made by the prosumer on its own. Such inspections shall not relieve Applicant from its obligation to maintain the DG Facility and any related equipment owned by Applicant in safe and satisfactory operating conditions. Licensee shall have the right to witness any testing by Applicant of the DG Facility."</i>



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14001:2015
CERTIFIED



Siddiq Leathers
since 1974

Siddiq Leather Works (Pvt) Ltd.

(A Siddiq Shafi Group Company)

Factory: 13 Km. Sheikhpura Road, Lahore, Pakistan. Ph: 92-42-37164533-35, 37164211

Fax: 92-42-37164477, E-mail: sales@siddiqleather.com URL: www.siddiqleather.com

NTN #: 0667413-5

To,

Dated 13-01-2026

The Registrar,

NEPRA Islamabad,

Date:

Subject: Concerns to the Proposed Inequitable Energy Exchange Ratio

REGISTRAR OFFICE
Diary No. 938
Date: 15.1.26

Respected Registrar,

We are writing to express our profound concern regarding the proposed amendments to the net-billing regulations, which threaten to make the exchange of solar energy fundamentally unfair for the average citizen. The most alarming aspect of this proposal is the massive disparity it creates between the price at which we buy electricity and the price at which we are forced to sell it. Under the new rates, a consumer would effectively have to export 5 to 6 units of clean solar energy just to offset the cost of 1 unit consumed from the grid at night. This ratio is economically unjustifiable and places an unreasonable burden on households that have invested their own capital to reduce the national energy deficit.

This "5-for-1" exchange logic ignores the technical and economic value that distributed solar provides to the national grid. During the blistering summer months of 2024 and 2025, prosumers provided essential daytime relief to an overstretched system, reducing the need for expensive "peaker" plants fueled by imported oil. By devaluing this contribution so drastically, NEPRA is sending a message that private investment in renewable energy is unwelcome. This policy will stall the momentum of the storage revolution, where we have already seen a surge of 1.25 GWh in battery imports as citizens try to find their own solutions to the energy crisis.

Furthermore, we believe that any regulation which forces a citizen to sell a commodity at a fraction of its market value to a state-backed monopoly (the DISCOs) is a violation of fair trade principles. Prosumers are not the cause of the "capacity payment" crisis; we are the ones providing a solution by generating power at the source. We urge NEPRA to maintain a fair and balanced exchange ratio that reflects the true cost of power and the value of green energy. We request the Authority to withdraw these lopsided amendments and protect the common man from being forced into an exploitative energy relationship.

Sincerely,

Muhammad Musaddiq
CEO / Siddiq Leather Works (pvt) Ltd

Forwarded please:

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<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> Consultation

For kind information please:

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Prov)

15-01-26

Head Office: 47-G.T. Road, Hide Market. P.O. Box No. 1676, Lahore-54900 (Pakistan) Phone: 92-42-36883600-03

Fax: 92-42-36883604 E-mail: slwho@siddiqleather.com /siddiqleather @Slwpyt

NEPRA
Licensing Department
Diary No. 413
Date: 15-1-26



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Fax: 92-42-37164477, E-mail: sales@siddiqleather.com URL: www.siddiqleather.com

NTN #: 0667413-5

Dated 12-01-2026

To,

The Registrar,

NEPRA Islamabad.

Subject: Presentation Against the Proposed 2025 Net-Billing Amendments

Respected Registrar,

We are writing to formally submit our opposition to the proposed amendments regarding distributed generation. These regulations threaten to dismantle the progress made by thousands of Pakistani households and businesses who have utilized their own savings to solve the national energy crisis.

A primary concern is the proposed reduction of the buyback rate at a time when the cost of living and inflation remain high. By significantly lowering the compensation for surplus energy exported to the grid, NEPRA is effectively subsidizing inefficient power distribution companies (DISCOs) at the expense of private citizens. This policy shift ignores the fact that prosumers have added massive decentralized capacity to the grid, surpassing 1.25 GWh of storage in 2024 alone, without a single rupee of government subsidy or sovereign guarantee.

Additionally, the new regulations create a "policy trap" for those who have already entered into long-term agreements. Any retrospective change to the tariff or the duration of existing licenses is a violation of the contractual trust between the state and its citizens. Such inconsistency creates a climate of uncertainty that will drive away future investors and halt the growth of the local solar industry. Instead of imposing restrictions, NEPRA should be facilitating the transition to "Smart Grids" where citizens are treated as partners in power generation, not as a source of extra revenue through new fixed charges.

Finally, we believe these amendments prioritize the protection of the traditional, expensive power model over the modern, clean energy future Pakistan desperately needs. We urge the Authority to reconsider these measures and instead focus on incentivizing the adoption of battery storage to manage peak loads. We request that NEPRA maintains the current one-to-one net metering benefits and protects the rights of the common man who is simply seeking relief from the highest electricity prices in the region.

Your Sincerely,

Muhammad Musaddiq

CEO / Siddiq Leather Works (pvt) Ltd

Forwarded please:

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<input type="checkbox"/> STA	<input type="checkbox"/> DG (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECON)

For kind information, please:

Chairman 2 M (Tech)
2 M (Law) 4 M (Dev)

15-01-26



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NTN #: 0667413-5

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SID001

To,

The Registrar,

NEPRA Islamabad,

Dated 13-01-2026

Subject: **Objections to the Proposed Changes in Distributed Generation Regulations**

Respected Registrar,

We are writing to voice our serious reservations regarding the proposed overhaul of the net-metering framework. While the government encourages a transition to "Green Energy," these new regulations create significant barriers for the very citizens who are footing the bill for this transition.

The most pressing concern is the shift toward a Gross Metering-style philosophy, which devalues the clean energy we contribute to the national pool. By proposing a buyback rate that is significantly lower than the cost of grid power, NEPRA is effectively creating a "solar tax" on households. This move ignores the reality that prosumers have saved the government billions by reducing the need for expensive furnace oil and LNG imports during peak daylight hours. Shifting the financial goalposts now will discourage future investment and kill the momentum of a sector that saw a record 1.25 GWh of battery storage integration in 2024.

Furthermore, the proposed fixed monthly charges for solar users are discriminatory. Solar prosumers already pay significant upfront costs, including a 10% GST on components as per the latest budget, and they continue to pay grid taxes on any units they consume from the DISCOs. Adding an extra "fixed fee" simply for being connected to the grid penalizes efficiency and environment-friendly behavior. It is illogical to punish citizens for reducing their carbon footprint when the state is struggling to meet international climate commitments and grid modernization.

Lastly, the lack of transparency in how these new rates were calculated is troubling. Consumers need a stable and predictable regulatory environment to justify long-term investments. We suggest that instead of curbing solar exports, NEPRA should introduce Time-of-Use (ToU) incentives that encourage consumers to export power during the grid's most stressed periods. We request the Authority to withdraw these amendments and engage in a meaningful dialogue with consumer protection groups to find a solution that does not sacrifice the interests of the common man to protect the margins of inefficient power companies.

Yout Sincerely,

Muhammad Musaddiq

CEO Siddiq Leather Works (Pvt) Ltd

Forwarded please:

☒ For new action ☐ For information

<input checked="" type="checkbox"/> DG (Inc.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Int.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> GLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

15-01-26

NEPRA
Licensing Department
Diry No. 416
Date: 16-1-26

Head Office: 47-G.T. Road, Hide Market, P.O. Box No. 1676 , Lahore-54900 (Pakistan) Phone: 92-42-36883600-03

Fax: 92-42-36883604 E-mail: siwho@siddiqleather.com /siddiqleather @Slwplt

To Chairman,
National Electric Power Regulatory Authority (NEPRA)
NEPRA Tower, Attaturk Avenue (East), Sector G-5/1
Islamabad, Pakistan

Forwarded please:

<input checked="" type="checkbox"/> For neg. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (I.C.)	<input type="checkbox"/> DG (Auto/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> DG (B.F)
<input checked="" type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (BOM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Office no 3. 4th Floor, Tawseer. Complex.
Civic Centre Bahria Town Phase 4.
Rawalpindi, Islamabad.

Subject: Feedback on New Net-Metering Policy – Concerns from a Leading Solar Solutions Provider Serving Islamabad, Rawalpindi, and Lahore

Dear Sir,

I hope you are doing well.

We at SiSUN Electric Pvt Ltd, a fast-growing solar solutions provider specializing in residential, commercial, and industrial systems across Islamabad, Rawalpindi, and Lahore, are writing to submit our formal feedback on the draft National Electric Power Regulatory Authority (Prosumer) Regulations, 2025, published on December 16, 2025.

As a trusted partner helping hundreds of Pakistani families and businesses transition to clean, reliable solar energy, we have seen firsthand how the current net metering policy has empowered ordinary people to fight high electricity bills, reduce dependence on the unstable grid, and contribute to a sustainable future.

The proposed shift to a net billing/gross metering system would seriously undermine this progress. Right now, under net metering, households can offset their grid usage with surplus solar power at retail rates (around PKR 22-26 per unit), delivering strong savings and payback periods of just 1.5-3 years for typical home installations.

Under the new rules, customers would pay full retail tariffs (PKR 55-65+ per unit, slab-dependent) for any grid electricity they use, while getting credited for exports at a much lower rate (like the national average energy purchase price of around PKR 11-13 per unit). This huge gap would slash monthly savings dramatically, stretch payback periods to 5-8 years or longer, and make solar feel unaffordable or simply not worth it for most middle-class families already struggling with inflation and rising costs.

We serve a wide range of clients in the twin cities and Lahore who view solar as a lifeline against frequent outages and escalating tariffs. Many are now hesitating or delaying installations due to these proposed changes. Additional hurdles—like stricter system size caps (tied to sanctioned load and transformer capacity limits), shorter 5-year agreements (instead of 7), and extra requirements like load flow studies for larger setups—would further discourage adoption.

This risks slowing Pakistan's solar boom, increasing reliance on expensive fossil fuels, delaying our renewable energy goals, and hurting the environment and public health in our polluted urban areas.

While we appreciate NEPRA's efforts to ensure grid stability and sector sustainability, we strongly urge a more balanced approach:

We are ready to provide more data from our installations or participate in discussions. Thank you for considering our input—we look forward to the upcoming public hearing and a policy that supports both the grid and the people powering Pakistan's brighter tomorrow.

Please contact us anytime.

Best regards,

Mohsin Zaheer
Chief Executive Officer
SiSUN Electric Pvt Ltd
Email: mohsin.zaheer@sisunelectric.com

Registrat

-92 (051) 2711031

Email: info@sisunelectric.com

sisunelectric.com

NEPRA

Licensing Department
File No. 394
Date: 15-1-26

REGISTRAR OFFICE
Dy No. 321
Date: 12-01-26

Shaïd UR Rehman

From: Zain Moulvi <zainmoulvi@gmail.com>
Sent: Thursday, 15 January, 2026 5:10 PM
To: Registrar@nepra.org.pk; Chairman@nepra.org.pk; IHUSSAIN@nepra.org.pk
Cc: Ikram Faiz; Zeenia Shaukat; Azhar Lashari; Mushtaq Gaadi; Qandeel Rehman; Abdul Rafe; Syed Ghazenfur; asadjuttah72@gmail.com
Subject: Comments on Draft Prosumer Regulations, 2025 by ACJCE
Attachments: ACJCE Prosumer Regulations Comments .pdf

Dear Sir,

I am writing this email on behalf of the Alliance for Climate Justice and Clean Energy (ACJCE). Please find attached our comments on the Draft Prosumer Regulations shared by your office.

We request to be allowed to intervene at any public hearings on the matter.

Please feel free to contact me if you have any questions.


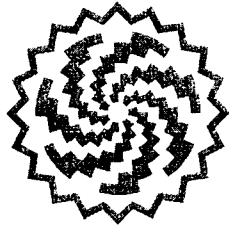

Regards,
Syed Zainuddin Moulvi
Member of ACJCE

Zain Moulvi
Research Director
Alternative Law Collective (ALC)
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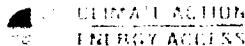



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		 VERRHA RESEARCH
11.	Lok Sujag	
13.	Centre for Regional Policy & Dialogue (CRPD)	 CENTRE FOR REGIONAL POLICY & DIALOGUE



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5.	Indus Consortium (IC)	
6.	Center for Social Innovation in Developing Countries (CSIDC)	
7.	Darya Lab (Climate Action Center-CAC)	
8.	Climate and Energy Action (CAEA)	
9.	Sujaan	
10.	Verrha Research	



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- align power regulation with climate, trade, and equity objectives rather than narrow utility revenue protection.

The following organizations of ACJCE endorse these comments:

Sr. #	Organization	Logos
1.	Alternative Law Collective (ALC)	 ALTERNATIVE LAW COLLECTIVE
2.	Policy Research Institute for Equitable Development (PRIED)	 PRIED <i>Policy Research Institute for Equitable Development</i>
3.	Alternate Development Services (ADS)	 Alternate <i>Development Services</i>
4.	The Knowledge Forum (TKF)	THE  KNOWLEDGE



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Pakistan's energy policies clearly envision distributed solar as a planning asset, an access solution, and a pillar of a decentralised transition. The Draft Prosumer Regulations negate these commitments by suppressing distributed generation, blocking decentralised markets, and privileging centralised legacy structures.

In doing so, NEPRA departs from facilitation to containment—undermining its own policy framework and frustrating Pakistan's stated energy transition objectives. The regulations therefore require withdrawal or fundamental revision to restore alignment with national energy and renewable energy policy commitments.

There is also clear disconnect from climate obligations and policy and CBAM realities in the draft regulations. Distributed solar is a core mitigation pathway under Pakistan's NDCs, AREF, NEP, integrated planning and post-COP commitments. The draft regulations were developed with no visible coordination with climate authorities. By weakening rooftop solar, NEPRA indirectly raises exporters' future CBAM exposure (especially of small and medium enterprises), undermines industrial decarbonisation, and erodes foreign exchange competitiveness.

CONCLUSION & RECOMMENDATIONS

The draft regulations do not modernise distributed solar and net metering: they re-centralise control, suppress innovation, and raise system costs, while transferring regulatory power to entities with direct commercial conflicts. They further disincentivize the emergence of least-cost P2P and B2B trading, solar sharing, and aggregation, precisely when Pakistan's energy crisis demands flexibility, decentralisation, and citizen-led investment.

ACJCE urges NEPRA to:

- withdraw the draft regulations in its present form;
- undertake a more comprehensive policy for expanding and integrating distributed solar as a least cost and equitable energy source
- restore NEPRA's direct regulatory role over distributed generation;
- explicitly enable service territory based microgrids, P2P, B2B, aggregation, and storage-integrated models;
- reduce grid costs by addressing the true drivers of high tariffs – namely costly over capacity and legacy contracts
- conduct empirical studies and trade-off analysis investigating other competing pathways of reducing grid costs such as displacement of legacy fossil fuel plants and large hydro capacity commitments; and



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projections, and (iii) pursue the progressive elimination of onerous requirements for distributed generation.

The draft regulations invert this mandate. While formally removing licensing, they replace it with restrictive tariffs, discretionary DISCO control, and prohibitions on use-cases essential to distributed generation. Instead of encouraging visible, grid-integrated solar, the framework pushes systems behind the meter—undermining planning visibility and frustrating the very objectives the policy sought to advance.

There are contradictions of ARE Policy 2019 which treats distributed solar as a solution, Not a problem

The Alternative & Renewable Energy Policy (AREP) 2019 explicitly identifies distributed generation, off-grid systems, B2B methodologies, and rural energy solutions as priority areas. Crucially, it treats distributed generation as a tool to manage system constraints, alongside forecasting, hybrid solutions, and other technological responses. The draft regulations contradict this logic by invoking grid constraints as justification for suppressing distributed solar, without deploying or enabling the very solutions AREP mandates. What policy frames as a system solution is recast by regulation as a system threat.

There is a breach of policy commitments on B2B, Net Metering, and Network Access

AREP requires NTDC and DISCOs to provide network access for B2B electricity sales, net metering, wheeling, and distributed generation services. The draft regulations instead prohibit prosumers from selling electricity to any entity other than the licensee and bar participation in market-based or shared energy arrangements.

This categorical prohibition extinguishes B2B and peer-to-peer trading, community solar, collective self-consumption, and microgrids—directly violating the policy mandate to enable decentralised and market-responsive energy models.

AREP expressly acknowledges that NEPRA's legacy licensing framework was designed for large utilities and is ill-suited to modern distributed energy. It warns that disproportionate regulatory burdens, prohibitions, and disincentives for small systems push energy activity off-grid and outside regulatory oversight. The Draft Regulations reproduce this distortion through tariff penalties, discretionary barriers, and transactional prohibitions that function as de facto licensing—without statutory safeguards or transparency—precisely the outcome AREP sought to avoid.



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Solar policy should be a public service architecture not centralized hegemony and/or private arbitrage

The HIES evidence does not argue for weakening solar incentives; it argues for reclaiming solar as a collective resource, governed in the public interest. Pakistan's energy transition will fail if it becomes a quiet privatisation of clean energy for those with capital, while the grid is left as a residual system for the poor who can wither ill afford any distributed solutions or only manage incomplete and insufficient solutions eventually being left to the mercy of an extractive and exploitative central grid.

What is required is more solar, not less—but governed differently:

- more public and shared solar,
- more support for vulnerable communities,
- more grid cost reform that tackles the real structural drivers of high cost,
- and more protection against elite exit and stranded-cost dumping.

Energy sovereignty in Pakistan will not be achieved by disciplining solar users. It will be achieved by disciplining the system, so that clean energy lowers costs, expands access, and strengthens the grid rather than hollowing it out.

I. POLICY MISALIGNMENTS

The Draft Prosumer Regulations are materially inconsistent with Pakistan's stated electricity and renewable energy policies. Rather than facilitating distributed solar as a system-strengthening resource, the regulations reframe it as a risk to be constrained—directly contradicting the policy framework within which NEPRA is required to operate.

The draft regulations risk a reversal of the National Energy Policy's facilitative mandate

The National Energy Policy explicitly recognises distributed generation as a growing and legitimate feature of modern power systems. It directs the Regulator to (i) devise facilitative registration guidelines. (ii) integrate distributed generation into system planning and demand



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This requires a differentiated and strategic solar framework, not a one-size-fits-all tariff instrument:

For vulnerable and underserved communities: policy must actively support full-need self-generation, including solar-plus-storage, community systems, feeder-level projects, and concessional financing. For households with chronic grid deprivation, energy sovereignty means *reliable, affordable, and sufficient grid independent power*, not marginal buyback credits.

For grid-dependent low-income consumers: the priority must be reducing grid-based costs and removing the burdens of capacity payments, fuel import exposure, and losses—so that affordable tariffs are delivered through the grid itself, not via exclusionary self-help mechanisms.

For high-consumption and high-capacity users: regulation must prevent partial exit strategies that allow affluent users to retain grid backup while offloading fixed system costs onto others. This requires rational cost allocation, transparent network charges, and rules that discourage opportunistic defection while still enabling, incentivizing, and integrating productive solar use that can be utilized in the system as well as in alternative ways for cheaper localized DER solutions.

For the system as a whole: solar must be integrated through grid modernisation, including hosting capacity analysis, storage integration, aggregation, mini grids, B2B, P2P, transparency, and planning visibility—rather than pushed behind the meter into invisibility.

The regs need to reframe the net metering and net billing debate

Within this framework, net metering should be treated as an integration tool not as a scapegoat for deeper structural failures. The notion that net metering entails some system costs in the presence of a real risk that net billing can increase self-consumption and defection means that suppressing solar exports cannot be justified. Rather it signals the need for system-level planning, demand response integration, and modern grid design. Poorly designed shifts toward net billing only risk accelerating undocumented behind-the-meter installations, shrinking visible grid demand, worsening planning errors, and undermining the very system sustainability they claim to protect.



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- Poorer households are significantly more likely to rely on solar as their sole lighting source, reflecting solar as a *coping mechanism* in the face of weak, unreliable, or unaffordable grid supply.
- Wealthier households are far more likely to operate larger, grid-connected hybrid systems, the configuration that captures the greatest regulatory and economic value under net metering.

Spatial patterns reinforce this distinction. High solar uptake in Balochistan, Khyber Pakhtunkhwa, and Sindh is driven primarily by grid deficits and service gaps, not discretionary investment. Punjab and Islamabad—where grid reliability is stronger—show much lower adoption even among richer households. Solar diffusion, therefore, reflects energy deprivation and adaptation, not merely wealth or preference.

This evidence does Not support penalising solar or prosumers

This distributional reality does not support policies that weaken solar economics across the board. On the contrary, it demonstrates that Pakistan already operates a dual solar system:

1. Solar as survival infrastructure for poorer and peripheral communities, often off-grid or solar-only, with small systems that do not meaningfully interact with net metering or export credits.
2. Solar as optimisation and hedging for wealthier households and firms, with larger systems, grid connectivity, and the capacity to benefit from tariffs.

Blunt reductions in buyback prices or restrictive prosumer rules do not correct this imbalance. Instead, they risk further marginalising solar-only and hybrid users in weak-grid regions, preventing localized market solutions from emerging, accelerating elite grid defection through batteries and behind-the-meter self-consumption, and transferring stranded grid costs onto poorer, captive consumers who cannot exit. The result is not grid protection, but regressive cost shifting.

The real policy challenge is energy sovereignty without grid abandonment

The correct policy response is therefore not to suppress distributed solar, but to rebuild a flexible grid as a public good while expanding real energy autonomy for the majority of Pakistanis.



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The regulations push from participation to insulation

As regulatory stability erodes, household responses shift accordingly. The discourse moves from participation toward insulation—batteries, increased self-consumption, partial disconnection, and self-provisioning. These are not coordinated acts of exit, but rational adjustments made in the absence of regulatory assurance. Over time, such responses accumulate outside policy visibility, until their aggregate effects—shrinking grid demand, higher tariffs for captive users, and deeper inequality—become difficult to reverse.

This is not a failure of citizen cooperation. It is a failure of governance to imagine an energy transition that is socially negotiated, regionally differentiated, and redistributive. The draft regulations therefore mark a critical juncture: whether Pakistan's energy transition will continue to be managed as an urban, fiscal exercise, or whether it will begin to recognise the diverse ways in which people—especially in historically marginalised regions—are already learning to live with, and beyond, the grid.

H. SOLAR, ENERGY SOVEREIGNTY, AND EQUITY: WHY THE EVIDENCE CALLS FOR STRONGER PUBLIC SUPPORT—NOT SOLAR SUPPRESSION

Pakistan's energy transition must be understood not merely as a decarbonisation exercise, but as a question of energy sovereignty, distributional justice, and institutional design. How solar policy is structured—especially net metering and grid integration—determines whether clean energy strengthens collective resilience or accelerates fragmentation, exclusion, and inequality. Recent household-level evidence does not justify suppressing solar through blunt tariff reductions; rather, it underscores the urgent need for differentiated, equity-oriented solar policy that expands autonomy for the vulnerable while preventing elite grid exit and cost dumping.

What the evidence actually shows

Data from the HIES 2024–25 confirms that solar adoption in Pakistan is widespread but highly differentiated by income, geography, and system configuration:

- Solar ownership rises from 16.4% in the poorest consumption quintile to 31.8% in the richest, but system scale diverges far more sharply.
- Among solar owners, average system size increases from ~1.5 panels in the poorest quintile to ~4 panels in the richest, concentrating generation capacity and economic value at the top.



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language of “distortion,” “burden,” and “cost-shifting” responds to an idealised version of prosumer behaviour that rarely existed. By isolating exported units while leaving upstream contractual and planning structures untouched, the regulations redistribute system risk downward, while shielding the sources of structural inefficiency.

The regulations do nothing to curb regional exclusion and unequal burden-sharing

These impacts are unevenly distributed. In regions such as the Siraiki Wasaib (South Punjab), where electricity infrastructure has long been fragile and public investment uneven, rooftop solar emerged as a modest adaptation to system limits—not as withdrawal from the grid. The Pakistan Energy Survey itself documents severe electricity access deficits in Sindh and Balochistan, where over 30 percent of households receive less than four hours of electricity per day, with Sindh reporting even higher rates of no access than Balochistan. In climate-stressed regions, electricity deprivation undermines health, education, and local economies, accelerates rural-to-urban migration, and intensifies pressure on already overburdened cities.

At the same time, Sindh’s industrial sector faces compounded stress from centralised energy governance: expensive grid electricity, levies on captive power, and repeated attempts to discourage solarisation. Despite possessing immense renewable potential, provincial authorities remain constrained from deploying local clean energy resources to stabilise livelihoods and industry. Communities continue to host power plants, transmission lines, and fuel corridors, yet remain peripheral to decision-making and benefit-sharing. Energy injustice here is not only about pricing or participation, but about the persistent denial of alternative pathways to address regional vulnerability and infrastructural neglect.

The regulations entrench an urban-centric policy that erases existing adaptation

What unites these experiences is an urban-centric policy imagination. Net-metering reform is calibrated around formally metered, grid-connected households, while vast areas with absent, weak, or inequitable access are treated as marginal to the transition. Yet these regions are already adapting—through off-grid solar, shared systems, and informal arrangements—not as acts of defiance, but as pragmatic responses to long-standing exclusion. These practices remain invisible in regulatory design, even as they quietly reshape energy use beyond the grid’s reach.

The state’s justification relies on a moral economy that obscures structural power. By portraying rooftop solar users as imposing costs on “ordinary consumers,” attention is diverted from far larger and more consequential transfers embedded in fossil-fuel contracts, capacity payments, and system losses. Small-scale citizen adaptation is problematised, while capital-intensive infrastructure is treated as inevitable and untouchable. Public resistance reflects an intuitive understanding of this imbalance, even when articulated outside formal policy language.



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G. ENERGY JUSTICE, REGIONAL EXCLUSION, AND NARRATIVE DISTORTION

The draft regulation misframe distributed solar as “free-riding”

The draft regulations advance a deeply distorted narrative that frames solar prosumers as “free-riders” or burden-shifters, while leaving the dominant drivers of tariff inflation and grid stress largely unexamined. Distributed solar is subjected to intense regulatory scrutiny, even as vastly larger and structurally embedded cost transfers—costly and over run large hydropower projects, capacity payments to fossil IPPs, exposure to volatile fuel imports, chronic transmission and distribution losses, and demand overestimation—remain insulated from comparable intervention. This asymmetry reflects not cost-reflective regulation, but selective moralisation of a marginal resource while protecting entrenched financial obligations.

At the same time, the regulations ignore the existing social and regional inequities in solar adoption. Net metering has indeed been skewed toward urban and middle-income users, while large segments of the population rely on off-grid, hybrid, shared, or informal solar arrangements due to weak or unreliable grid access. The regulatory challenge, therefore, was to design flexible and inclusive mechanisms that integrate these users into the formal system through incentives, aggregation, and sharing models. Instead, the draft regulations further exclude precisely those regions and communities with fragile grids, informal energy practices, and long-standing exclusion from energy decision-making. Off-grid realities and hybrid systems already in use are neither recognised nor accommodated.

The draft regulation are an example of recentralisation disguised as technical adjustment

The draft regulations do not represent a neutral technical recalibration; they clarify and reassert where authority over energy flows, pricing, and decision-making ultimately resides. What is presented as a tariff or accounting adjustment is experienced, particularly outside major urban centres, as a tightening of centralised control over an already constrained space of household energy autonomy. Rooftop solar never offered full exit from the grid; it provided partial relief from a system shaped by imported fuels, rigid capacity payments, and uneven infrastructure investment. The contraction of even this limited space therefore carries significance far beyond revenue accounting.

For most households, rooftop solar was not adopted as a market intervention or investment strategy, nor as a claim on surplus value. It was a response to necessity: unreliable supply, volatile tariffs, and the steady erosion of predictability in grid electricity. The regulatory



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gas, and hydropower plants, or reductions in capacity payments enabled by surplus clean generation and diversified demand-side resources.

Instead, the system preserves a high-cost, over-capacity equilibrium while penalising households and firms that self-finance cleaner alternatives capable of reducing long-run system costs. Distributed solar is treated primarily as a short-term revenue threat to increasingly privatised utilities, rather than as a publicly valuable planning resource that could ease the structural distortions created by legacy contracts and demand overestimation.

The economic consequences of this failure are tangible. Available analysis suggests that Pakistan is foregoing roughly USD 0.7 billion per decade in potential carbon-credit revenue from just five existing coal plants. This represents lost fiscal space that could otherwise be used to offset capacity payments, reduce consumer tariffs, or support a just transition in coal-dependent regions. Under a planning regime that explicitly modelled displacement—particularly where distributed solar erodes daytime coal dispatch—such value could be captured through managed retirements or conversions. Instead, coal plants remain financially insulated, while cheaper and cleaner alternatives are constrained.

Once carbon pricing exposure, CBAM risks, and climate-finance eligibility are incorporated into system costs, the continued protection of surplus coal and hydropower capacity becomes not only environmentally indefensible but economically irrational. Disincentivising distributed solar under the draft regulations does not protect the grid in the short or long term; it misdirects the blame thereby further locking in higher long-term costs, narrows access to climate finance, and delays unavoidable adjustments to the fossil fleet.

In this context, the draft prosumer regulations reflect a fundamental misalignment between regulation and planning. By suppressing distributed solar rather than integrating it into a coherent displacement and rationalisation strategy, NEPRA departs from its mandate to promote least-cost, efficient, and sustainable electricity systems. The result is a regulatory framework that manages short-term utility revenue stress while entrenching the underlying structural problem: an oversized, fossil-heavy power sector shielded from competitive pressure, public scrutiny, and long-term economic reality.



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Such an approach would allow NEPRA to move from exclusionary regulation toward a principled and evidence-based integration, enabling distributed solar to function not as a threat to the grid, but as a flexible, least-cost asset aligned with Pakistan's evolving electricity market and public-interest obligations.

F. BY RESTRICTING SOLAR INTEGRATION WITHOUT FOSSIL RETIREMENTS THE REGULATIONS UNDERMINE LEAST-COST PLANNING AND FOSSIL FLEET RATIONALISATION

The Draft Prosumer Regulations 2025 fail to provide least-cost pathways for Pakistan's power sector because they do not maximise the integration of distributed solar in a manner consistent with fossil-fuel displacement and national least-cost planning obligations. These regulations cannot be assessed in isolation; they must be read alongside the Integrated Generation Capacity Expansion Plan (IGCEP) and the Transmission System Expansion Plan (TSEP). Viewed together, they entrench a systemic planning failure: the persistent absence of explicit, enforceable pathways linking renewable energy uptake to the retirement or rationalisation of uneconomic fossil capacity.

Pakistan's Alternative and Renewable Energy Policy (AREP) is clear that renewable energy induction is not simply about adding new capacity. It is explicitly intended to displace more expensive thermal generation wherever such displacement reduces average system costs (policy directive #1.4.4). AREP further requires that each annual iteration of the IGCEP identify concrete displacement options and feed them into capacity planning decisions. This reflects a foundational principle of least-cost planning: decisions about what to add to the system must be inseparable from decisions about what to retire, de-rate, or stop protecting.

In practice, however, both the IGCEP and the TSEP have failed to operationalise this principle. Their modelling frameworks overwhelmingly prioritise incremental capacity additions while treating the existing coal, gas, and large hydropower fleet as largely fixed. Scenarios that seriously examine early retirement, mothballing, or reduced dispatch of uneconomic fossil plants—despite persistent overcapacity and rising fixed costs—are either absent or marginal. The result is a planning architecture that asks what to build, but not what to phase out, leaving the system structurally incomplete and fiscally distorted.

The draft prosumer regulations replicate this same blind spot at the distributed generation level. By discouraging rooftop solar and foreclosing pathways for peer-to-peer trading, aggregation, community solar, and solar sharing, the regulations sever any practical link between distributed renewable uptake and fossil-fleet rationalisation in enabling least cost pathways. Efforts to curb distributed solar in the name of "grid affordability" proceed without examining alternative, and far more effective, cost-containment pathways—such as early retirement of uneconomic coal.



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In doing so, the draft Prosumer Regulations entrench a structural prohibition on least-cost, people-centric distributed energy models, most notably peer-to-peer (P2P), business-to-business (B2B), and community-based solar systems. Regulation 6(2) categorically restricts prosumers from selling electricity to any entity other than the licensee, effectively foreclosing shared and collective self-consumption, microgrids, community solar arrangements, and local energy trading—even where such arrangements would reduce grid stress and meet nearby demand.

This provision preserves the retail monopoly of DISCOs by design, compelling all surplus electricity to be exported to the grid at the National Average Energy Purchase Price, regardless of the presence of proximate consumers willing to pay more than NAEP and less than the retail tariff and even barring prosumers willing to provide surplus energy to other needy consumers. The result is an economically irrational outcome: clean, locally generated, cheap electricity is undervalued, while local demand is met through higher-cost, centrally dispatched generation. Globally, P2P trading, community solar, and aggregated distributed resources are recognized as least-cost grid-integration tools, particularly in systems facing congestion, losses, and capital constraints—precisely the conditions characterizing Pakistan’s power sector.

This prohibition is also misaligned with Pakistan’s transition toward an open access market. Prosumers are already investing significant private capital in distributed generation, storage, and smart inverters. A regulatory framework that limits their participation exclusively to selling energy to DISCOs not only suppresses innovation and investment, but also contradicts the stated objective of open markets by preventing smaller actors from accessing emerging market structures.

The regulations also introduce unrationalized technical caps which are deployed as discretionary chokepoints

The draft regulations introduce multiple non-tariff barriers with no disclosed system-level justification: e.g. 80 percent transformer hosting capacity cap (Reg. 3(5)), Reduction of sanctioned load ratio from 1:1.5 to 1:1 (Reg. 3(2)); Mandatory load flow studies at relatively low thresholds (Reg. 3(3)); and Shortened agreement term (5 years vs 7 years previously). Together, these will enable indefinite delays, create opaque rejection pathways, and shift risk entirely onto consumers.

NEPRA should replace the blanket prohibition in Regulation 6(2) with a graduated market-access framework for distributed energy resources. At a minimum, the Authority should authorize P2P trading, mini grid solutions within DISCO territories, community solar sharing, and Virtual Power Plant (VPP) aggregation within defined parameters. Questions around thresholds for capacity, metering and settlement rules, consumer-protection standards, and grid-support obligations should be put to multi stakeholder dialogues.



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no intelligible differentia between accepted and rejected applicants, nor any rational nexus between the classification and the stated objective of grid protection.

Moreover, Regulation 3(5) invokes protection against “unlawful extensions” but ignores less restrictive and technically available alternatives, including inverter-based export controls, phase balancing, targeted upgrades, and time-bound curtailment. The failure to require DISCOs to exhaust these measures before rejection amounts to regulatory overbreadth and an abdication of NEPRA’s duty to ensure non-discriminatory access to the grid.

To comply with Article 25 and principles of proportional regulation, the framework must require that:

1. Hosting Capacity Analysis be conducted using real-time loading data, diversity factors, and net-export profiles.
2. Least-restrictive measures (export limits, inverter settings, phase balancing, targeted upgrades) be attempted before denial.
3. Transparency obligations be imposed, including publication of transformer loading, HCA results, connection queues, rejection reasons, and upgrade timelines.

Absent these safeguards, the 80% transformer cap operates as a discriminatory barrier to distributed solar adoption, privileging legacy grid arrangements and denying equal access to cleaner, self-financed energy solutions—contrary to Article 25 and NEPRA’s statutory mandate.

E. FAILURE TO ENABLE MODERN GRID INTEGRATION AND STRUCTURAL BLOCKING OF PEER-TO-PEER, BUSINESS-TO-BUSINESS, AND COMMUNITY SOLAR

The regulations offer no framework for storage, aggregation, or system services which could allow the system to benefit from the distributed solar

The Regulations ignores the role of Battery Energy Storage Systems (BESS), Virtual Power Plants (VPPs), aggregated demand response, mini grids, and ancillary service provision by distributed assets in integrating increasing proportions of distributed solar. The objective should be to scale this cheaper generation into long term grid strengthening assets that open up longer term affordable and clean pathways. Instead of treating rooftop solar as a grid asset, the framework treats it as a containment problem.



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rising electricity demand due to heatwaves and electrification. There is simply no assessment of distributional impacts whatsoever.

Before changing tariffs, NEPRA should therefore carry out and publicly share a proper impact study. This study must explicitly weigh the trade-offs between short-term revenue recovery and long-term affordability, universal energy access, and fairness. It should examine how different consumers—homes, businesses, and industries—will respond to the new prices, how tariffs may shift across slabs, and how vulnerable households will be affected over time. It should also assess the impact on overall grid stability and public finances. Based on this evidence, NEPRA should design careful, phased solutions and targeted protections, rather than bluntly cutting solar buy-back rates and imposing barriers for prosumers and distributed market solutions. Without such analysis, the proposed approach risks pushing people off the grid, worsening inequality, and weakening the long-term health and affordability of Pakistan's power system.

D. DISCRIMINATORY CONSTRAINT ON NEW PROSUMER CONNECTIONS

* The imposition of a blanket 80% distributed generation (DG) penetration cap at the transformer level under Regulations 3(5) and 5(d) constitutes arbitrary and discriminatory regulation, in violation of Article 25 of the Constitution, which guarantees equality before the law and prohibits unequal treatment of similarly situated persons without reasonable classification.

The draft regulations apply the 80% threshold uniformly and mechanically, without requiring any dynamic Hosting Capacity Analysis (HCA), feeder-level assessment, or evaluation of actual net-export behaviour. This approach treats all prosumers as technically identical, despite clear and material differences in on-site consumption patterns, export volumes and timing, inverter controls and export limits, and load coincidence with solar generation.

As a result, consumers with high daytime self-consumption and minimal net exports are treated identically to export-heavy systems, even though their impact on the grid is fundamentally different. Installed capacity—rather than demonstrable grid impact—becomes the sole basis for denial. This irrational equivalence leads to discriminatory outcomes. For instance, once the notional 80% threshold is reached, otherwise eligible consumers are barred from access to distributed generation, regardless of whether the transformer experiences any real thermal, voltage, or reverse-flow stress.

The regulation further entrenches inequity through a first-come, first-served saturation effect, privileging early applicants while excluding later consumers without objective justification. Such an outcome fails the constitutional test of reasonable classification under Article 25, as there is



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assertion that distributed solar shifts costs onto “ordinary consumers.” However, the regulations present no empirical evidence demonstrating that discouraging rooftop solar delivers greater tariff relief than addressing the dominant drivers of tariff inflation: legacy capacity payments, guaranteed returns to fossil-fuel IPPs, take-or-pay fuel contracts, and systematic demand overestimation embedded in planning instruments. In effect, the regulatory response targets a marginal contributor to tariff pressure while leaving the principal cost behemoths structurally untouched.

Critically, the adopted valuation framework excludes the system-wide avoided costs and co-benefits of distributed solar, including avoided fuel imports and foreign-exchange exposure; reduced emissions and public-health costs; lower transmission and distribution losses; deferred grid investments; and daytime generation aligned with cooling-driven demand peaks. Standard principles of least-cost planning and economic regulation require generation resources to be valued based on long-run system impacts, not merely short-run variable costs. By compensating distributed solar on an energy-only basis while continuing to socialize legacy capacity liabilities across retail tariffs, the draft regulations misallocate fixed system costs onto a shrinking pool of grid-dependent consumers. This does not reduce system costs; it merely redistributes inefficiency downward, while suppressing investment in resources that would lower long-term costs.

The discrimination becomes starker when compared with the treatment of fossil-fuel IPP’s and large hydropower plants, which continue to receive multi-part tariffs recognizing capacity availability and contractual guarantees even when plants are under-dispatched or surplus to system needs. Distributed solar—privately financed, modular, emissions-free, and rapidly deployable—is uniquely denied recognition of its broader system value. This violates principles of technology-neutral regulation, non-discrimination, and economic efficiency, and locks the system into higher ecological and fiscal risk.

What is especially worrying is that the proposed rules ignore how people actually respond to prices. If the payment for surplus solar power is set too low, large electricity users will naturally try to avoid the grid. They will use more of their own solar power, invest in batteries, or reduce their grid use as much as possible. This means fewer units of electricity are bought from the grid overall. When that happens, the fixed costs of running the grid—capacity costs, other legacy liabilities, wires, transformers, and system maintenance—are spread across fewer consumers, pushing electricity prices even higher for those who cannot leave the grid, especially low-income households and small users.

The draft regulations do not show any serious analysis of these risks. There is no study of what happens to tariffs if many users reduce grid consumption, no assessment of how ongoing subsidy reforms or IMF-linked tariff increases will interact with these rules, and no consideration of



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regulatory safeguards embedded in the parent statute. The draft regulations define “prosumer” to mean “an applicant who has entered into an agreement with licensee for distributed generation.” This is explicitly an unlicensed and statutorily undefined category. This creates a legally unstable regime, vulnerable to challenge and selective enforcement.

The draft regulations are premised on a clear conflict of interest

DISCOs—which have repeatedly opposed distributed generation especially rooftop solar in tariff and revenue petitions—are now empowered to assess feasibility, delay or reject applications, disconnect facilities and shape operational conditions. This is a textbook case of regulatory capture and conflict of interest, converting commercial entities with distribution functions into de facto regulators.

B. GOVERNANCE RISKS UNDER DISCO PRIVATISATION

The planned privatisation of the DISCOs magnifies regulatory abdication

By transferring discretion to DISCOs before or during privatisation, NEPRA entrenches private monopolies, weakens public oversight, and eliminates future regulatory flexibility. Once embedded, these controls will be contractually and politically difficult to unwind.

C. ARBITRARY TARIFF DESIGN, ECONOMIC DISTORTION, AND THE RISK OF GRID DEFECTION

The proposed revision to the prosumer buy-back framework rests on an arbitrary, undefined, and legally ungrounded tariff construct, namely the “national average energy purchase price” (NAEPP). This term is not defined in the NEPRA Act, the Tariff Standards and Procedure Rules, 1998, or any notified regulatory instrument. NEPRA’s statutory authority to determine tariffs is explicitly tied to licensed entities through a transparent cost-of-service process. Having simultaneously removed the requirement for prosumers to hold generation licences, the Authority lacks legal and procedural basis to impose a self-constructed, administratively determined tariff on a non-licensed category. The resulting buy-back rate is therefore not merely sub-optimal policy—it is ultra vires, opaque, and economically arbitrary.

Substantively, the draft regulations institutionalize a structurally discriminatory valuation of distributed solar. Prosumers are required to purchase electricity at the full retail tariff—approximately Rs 35 per unit—comprising energy charges, capacity payments, network costs, and cross-subsidies. Yet electricity exported by the same prosumers is compensated only at the energy-only cost of approximately Rs 8–9 per unit. This asymmetry is justified on the



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Summary of the Alliance's position:

The Draft NEPRA (Prosumer) Regulations 2025 adopt a piecemeal, partial, and ultimately counterproductive approach to the regulatory reforms required for a just energy transition. Rather than modernising Pakistan's grid and regulatory framework to enable and integrate peer-to-peer (P2P), business-to-business (B2B), solar-sharing, aggregation, and storage-integrated models, the draft risks entrenching centralised utility control at the expense of least-cost, efficient, and socially inclusive distributed energy solutions. In particular, the regulations:

- introduce new tariff and non-tariff barriers to distributed solar;
- shift effective regulatory authority from NEPRA to commercial DISCOs;
- foreclose viable pathways for distributed trading and aggregation;
- risk locking Pakistan into a high-cost, monopoly-controlled transition—a risk that will be further amplified by DISCO privatisation;
- fail to propose any meaningful structural reforms to dismantle legacy constraints and entrenched hydropower and fossil-fuel interests, which are the primary drivers of high grid costs, and
- fail to provide a meaningful regulatory framework and policy for maximizing the potential benefits of solar and integrating it for a successful and just energy transition

Detailed Comments:

A. REGULATORY ILLEGALITY & ABDICATION OF STATUTORY AUTHORITY

The regulations entail unlawful delegation of regulatory powers to DISCOs

The Draft Regulations vest primary approval, inspection, and ongoing regulatory control over distributed generation in licensee DISCOs (Regs. 3–6), while NEPRA retains only a post-facto “concurrence” role. This is ultra vires the NEPRA Act, 1997, which clearly separates generation, transmission, and distribution functions and does not permit delegation of licensing or regulatory powers for generation to distribution licensees. Under the Act, generation without NEPRA license and permission is unlawful, and NEPRA is expressly prohibited from outsourcing this responsibility.

The regulations create an extra-statutory category (“prosumer”)

The term “prosumer” does not exist in the NEPRA Act, 1997. Regulations may operationalise statutory categories, but cannot invent new legal classes that bypass licensing, tariff, and



Alliance for
Climate Justice &
Clean Energy

Comments on Draft Prosumer Regulations 2025

By: Alliance for Climate Justice and Clean Energy (ACJCE)

To: The Registrar

National Electric Power Regulatory Authority

NEPRA Tower, Ataturk Avenue (East)

G-5/1, Islamabad

Dated: January 14th, 2026

Subject: Comments on Draft Prosumer Regulations, 2025 by the Alliance for Climate Justice and Clean Energy (ACJCE)

Dear Sir,

Attached herewith are comments from the ACJCE in response to the Draft of Prosumer Regulations 2025 prepared by NEPRA and shared by your office along with Notice inviting comments in writing from all stakeholders as published on your website on 16th December, 2025.

ACJCE is a coalition of various civil society organizations comprising lawyers, journalists, academics, and policy professionals, specializing in environmental issues with a focus on the energy sector — particularly the transition away from fossil fuels and towards renewable sources. The undersigned organizations of the coalition are submitting these comments as concerned citizens and groups who are likely to be affected if the draft regulations are approved in their current form by the authority: We offer these comments as groups committed to a just energy transition and as citizens who stand for a socially inclusive and green energy policy.

We hope that these comments and suggestions are taken up by NEPRA in any public hearing to be held on the matter and request to be allowed to present the same during the said hearing.

Best Regards,

Zain Moulvi

Member of ACJCE



Karachi Chamber of Commerce & Industry (KCCI)

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/UCM)

For kind information, please,

Chairman 2 M (Tech)
3. M (Law) 4. M (Dev)

KCCI/PSU/2024-2026/8580

January 12th, 2026

Registrar
National Electric Power Regulatory Authority (NEPRA)
NEPRA Tower, Attaturk Avenue (East)
Sector G-5/1,
Islamabad.

Subject: CHANGES IN NET-METERING POLICY BY NEPRA

Dear Sir,

Reference is made to the captioned subject. In this regard, KCCI's comments are given hereunder for your kind consideration:

1. It will adversely affect the green energy: Solar energy powerfully promotes green energy by offering a virtually emission-free, renewable power source that reduces greenhouse gases, combats climate change, conserves water, and lessens reliance on polluting fossil fuels, contributing to cleaner air, healthier ecosystems and sustainable development for a greener future.
2. DISCOS & KE will sell electricity in Rupees 55-60 and will purchase electricity in Rupees 9-11 which is entirely unjustified.
3. However, on 18th November 2025, Central Power Purchasing Agency (CPPA) CEO Rehan Akhtar while testifying before the NEPRA said that while solar generation is increasing, but this does not have a significant impact on the grid. According to him, the energy costs had led to a shift to solar power. They are now consuming more due to solar availability but their offtake from the national grid has not changed. Their withdrawal from the grid is almost stable. They are drawing the same quantities they were drawing earlier, he said adding however the same could not be predicted about the future. In fact, the real issue lies in poor Government policies, due to which the Government is required to make capacity payments amounting to millions of dollars without consuming electricity. The burden of these flawed policies and decisions is now being shifted onto solar users. NEPRA's decision will reduce the installation of solar systems, which will negatively impact the environment. Unfortunately, the Ministry of Climate Change remains a silent spectator.

NEPRA
Licensing Department
Dy. No. 396
Date: 15-1-26

RECEIVED OFFICE
Dy. No. 894
Date: 14.1.26



Karachi Chamber of Commerce & Industry (KCCI)

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4. Changing policy will force people towards batteries usage, its import will increase burdening foreign exchange reserves because dollars will be used.
5. Electricity rates are very high actually as high as double the rate in Pakistan as compared with other regional countries like India, Bangladesh due to which Pakistan becomes noncompetitive in exporting goods abroad.
6. People are getting cheaper electricity using solar panels but Government take actions from time to time due to which it becomes difficult for the people to get cheap electricity. First the Government added 18% sales tax in the budget 2025-2026 and then reduced to 10% which discouraged the use of solar.
7. Industry has adjusted its electricity cost by using net metering, some electricity is taken from national grid and some is taken from solar so the average cost of electricity is lessened by the industries in this manner. Some industry has already been closed down, the rest is trying to reduce the electricity cost.
8. Net metering was started in 2018 and people have invested billions on it which will be adversely affected and go to waste.
10. In Indicative Generation Capacity Expansion Plan (IGCEP), the Government included several thousand megawatts of power generation capacity, which subsequently proved to be the result of flawed planning. This miscalculation led to highly objectionable outcomes, including surplus capacity and excessive financial liabilities. Despite these past lessons, the Government is now formulating a new IGCEP and appears to be repeating the same approach by categorizing approximately 17,000 MW of additional capacity as "critical" and "strategic." If approved, this capacity would entail massive capacity payments amounting to trillions of rupees, the burden of which would ultimately be passed on to electricity consumers.
11. It is evident that the Power Division, Ministry of Energy, Government of Pakistan, intends to effectively curtail or end net-metering, apparently on the premise that consumers should instead be compelled to purchase electricity from Independent Power Producers (IPPs). This approach mirrors the earlier policy shift regarding captive power, which was severely detrimental to the industrial sector and forced industries to procure high-cost electricity from the national grid.

Similarly, the current attempt to undermine net-metering is being justified through unsubstantiated claims, such as exaggerated figures regarding electricity consumption through solar net-metering and alleged losses amounting to billions of rupees, with further



Karachi Chamber of Commerce & Industry (KCCI)

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assertions that losses will reach tens of billions over the next decade. These claims have been presented without transparent data, credible calculations, or supporting evidence.

Previously, the authorities also asserted that electricity demand would rise sharply in line with projected trends, a claim that led to serious planning errors and the current surplus capacity crisis. In light of these repeated misjudgments and the absence of credible justification, the Karachi Chamber of Commerce & Industry (KCCI) categorically rejects any proposed amendments to the Net Metering Policy Regulations.

Thank you for your attention to this urgent matter. We look forward to your kind consideration.

Thanks and regards

Tanveer Ahmed Barry
Former Vice President KCCI &
Senior Advisor, Public Sector Utilities,
Power & Gas, Sub-Committee KCCI

ISLAMABAD ELECTRIC SUPPLY COMPANY

PABX: 051 - 925237 - 39 (Ext.)
Direct: 051 - 9212023
Fax: 051 - 9252911
Email: dgmirad@iesco.com.pk

No. 09-591 /IESCO/MIRAD/DG

Dated 13 /1//2026

Mr. WASIM ANWAR BHINDER,
Office of the Registrar NEPRA,
NEPRA Tower, Ataturk Avenue (East), G-5/1,
Islamabad

Subject: COMMENTS ON DRAFT NEPRA (PROSUMER) REGULATIONS, 2025

Ref: Your office letter No. NEPRA/DG (LIC) NMR 01/07-59 dated January 02, 2026.

Enclosed please find herewith comments on Draft NEPRA (Prosumer) Regulations, 2025, hereby forwarded for further necessary action please.

D.A

Comments on Draft

Director General (MIRAD)
IESCO, Islamabad

Copy to:

1. All GM/CEs under IESCO Islamabad.
2. CFO/CLO IESCO Islamabad.
3. Dy. Director (Coordination) IESCO Islamabad.
4. Master File.

Forwarded please:

<input checked="" type="checkbox"/> For info. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin./M&A)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (Tr.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin.)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

14.1.26

REGISTRAR OFFICE
Dy. No. 883
Date: 14.1.26

IESCO COMMENTS ON DRAFT NEPRA PROSUMER REGULATIONS, 2025

Sr. No	Regulation No	Description of Content	Comments/Remarks
1	Definition (n)	The prosumer shall be responsible for the installation of equipment, including, without limitation, electrical lines or circuits, transformers, switch gear, safety and protective devices, meters or electrical plant, to be used for interconnection	The scope of prosumer-owned interconnection equipment should explicitly include power quality and system stability devices, such as harmonic filters, tuning filters, reactive power (VAR) compensation equipment, and other voltage and frequency control devices, as necessary. The provision of such equipment at the prosumer's end is essential to ensure system stability, compliance with grid codes, and acceptable power quality levels at the point of interconnection.
2	3(2)	The capacity of a proposed distributed generation facility shall not exceed the sanctioned load of the applicant's premises: <i>NEPRA * Size of DG should be based on actual demand for last 12 months.</i>	In practice, sanctioned load is often approved in excess of the actual operational requirement, which may result in misinterpretation or misuse of this criterion for determining permissible distributed generation (DG) capacity. Consequently, reliance solely on sanctioned load does not provide a technically sound basis for limiting DG capacity. It is therefore recommended that the maximum permissible DG capacity should be based on the prosumer's actual demand for last 12 months (preceding the installation of Solar PV) and the available hosting capacity of the distribution network, as assessed in accordance with international utility planning practices and standards.
3	3(3)	An applicant proposing to install a distributed generation facility with an installed capacity of 250 KW or above shall be obligated to conduct and submit a load flow study carried out through the licensee or any reputable consultant registered with Pakistan Engineering Council.	Registration with the Pakistan Engineering Council (PEC) is a statutory requirement for engineering consultants; therefore, this condition is implicit and need not be separately emphasized. However, it is essential that the consultant possesses a valid consultancy license in the relevant discipline and has authorized access to internationally recognized power system analysis software required for conducting grid interconnection assessments. Furthermore, the term "load flow study" is technically limited and does not fully capture the scope of analysis required for distributed generation integration. It is therefore recommended that the term be replaced with the following, as applicable: <ul style="list-style-type: none"> Interconnection Study or System Impact Assessment Study (SIAS), and These studies should comprehensively address voltage regulation, thermal loading, reverse power flow, protection coordination, power quality, and system stability impacts.
4	3(5)	Provided further that the licensee shall not entertain any application if the distributed generation capacity connected to a particular distribution transformer has reached 80% of its rated capacity.	The 80% threshold specified in this clause is ambiguous and insufficiently defined, and therefore requires clarification. It is not explicitly stated whether this limit refers to thermal loading, reverse power flow capability, or voltage regulation constraints, which may lead to inconsistent interpretation and application. Moreover, the regulation does not account for the hosting capacity of the upstream 11 kV feeder, despite the fact that DISCOs are increasingly observing significant reverse power flow toward the transmission system, resulting in adverse impacts such as abnormal transformer operation, increased losses, localized overheating, and accelerated insulation degradation. To effectively manage and limit distributed generation penetration, it is recommended that DG hosting capacity

			be determined using established international distribution system operator (DSO) practices, including feeder-level and transformer-level hosting capacity assessments, based on technical parameters such as thermal limits, voltage rise, protection coordination, power quality and minimum demand constraints.
5	5 (d)	the licensee shall introduce necessary validation checks to monitor the unlawful extension of the distribution generation facility.	The licensee shall implement robust validation, monitoring, and audit mechanisms to detect and prevent any unauthorized extension, modification, or capacity enhancement of a distributed generation facility beyond the approved capacity. Any prosumer found to have engaged in an unlawful extension or modification of the distributed generation facility shall be subject to penalties in accordance with applicable regulations, which may include, but shall not be limited to, disconnection of the facility, termination of the interconnection agreement, and/or cancellation of net-metering privileges, without prejudice to any other legal remedies available to the licensee.
6	6 (1)	A prosumer shall operate and maintain its distributed generation facility and interconnection facilities in accordance with prudent electrical practices	A prosumer shall operate and maintain its distributed generation facility and interconnection facilities in accordance with prudent utility and electrical engineering practices, and in full compliance with the NEPRA approved Distribution Code, <u>including but not limited to prescribed voltage limits, reactive power (VAR) control requirements, harmonic distortion limits, and applicable power quality standards.</u>
7	9 (1)	The protection and control diagrams for the interconnection of the prosumer shall be in accordance with the provisions of the grid code and applicable documents and approved by the licensee prior to commissioning of the proposed interconnection facilities and a single line diagram as specified in Schedule-VII.	<u>Schedule VII is missing</u>
	9 (3)	The protective functions shall be equipped with automatic means to prevent reconnection of the distributed generation facility with the distribution facilities of the licensee: Provided that the service voltage and frequency is of specified setting and is stable and mutually agreed between the licensee and the prosumer.	The distributed generation facility shall be equipped with an <u>automatic protection scheme</u> incorporating, at a minimum, over-voltage, under-voltage, under-frequency, and over-frequency protection relays, in order to maintain system stability and ensure operation within the permissible limits prescribed under these Regulations and the <u>Distribution Code.</u>
9	9 (5)	The grid connected inverters and generators shall comply with Underwriter Laboratories UL 1741 standard (Inverters, Converters, Controllers and	It is recommended that the technical specifications and compliance requirements for inverters, converters, controllers, and interconnection system equipment used with distributed energy resources be formulated and notified locally by AEDB/PPIB, in consultation with DISCOs and other relevant stakeholders. Such specifications should be aligned with international

		<i>Interconnection System Equipment for Use with Distributed Energy Resources) which addresses the electrical interconnection design of various forms of generating equipment, IEEE 1547 2003, IEC 61215, EN or other international standards.</i>	<i>standards while ensuring compatibility with local grid conditions, protection philosophies, and operational practices, similar to the standardization approach adopted for other equipment used within the transmission and distribution networks of DISCOs.</i>
10	10 (2) and 10 (3)	<i>In the event of such interference, the prosumer must diligently pursue and take corrective action at its own expense after being given notice and reasonable time to do so by the licensee. On account of any failure on part of the prosumer to take timely corrective action, the licensee may, without liability, disconnect the distribution generation facility from the distribution system, in accordance with these regulations.</i>	<i>To prevent adverse impacts or superimposition on the host DISCO's distribution network, the prosumer shall be required to install and maintain automatic protection devices, including over-voltage, under-voltage, over-frequency, and under-frequency relays, configured to isolate the distributed generation facility automatically whenever operating parameters exceed the permissible limits prescribed under these Regulations and the Distribution Code..</i>
11	13 (3)	<i>The meter reading shall be carried out preferably through hand held units (HHU) and through automated means as directed by the Authority from time to time.</i>	<i>In order to ensure effective compliance with Regulations 3 and 10 of these Regulations, and to enable accurate monitoring, control, and enforcement, bidirectional metering for distributed generation shall be based on Advanced Metering Infrastructure (AMI). As DISCOs are progressively deploying AMI systems, all bidirectional meters installed for prosumers shall be AMI-compliant, enabling real-time data acquisition, remote monitoring, and detection of abnormal export, voltage, and frequency conditions.</i>
12	14(a,b)	<i>(a) the kWh supplied by licensee to prosumer, shall be billed in accordance with the applicable tariff.</i>	<i>(a) the kWh supplied by licensee to prosumer, shall be billed in accordance with the applicable tariff including all taxes .</i>
13		<i>Additional comments</i>	<i>In the event that a prosumer exports energy in excess of the permissible or approved limits over a billing year, relative to its installed or sanctioned distributed generation capacity, any rebate, credit, or net-billing benefit applicable to such excess exported energy shall stand forfeited. This measure is intended to discourage excessive and uncontrolled energy export and to ensure equitable and stable operation of the distribution network.</i>

Handwritten signature and initials, possibly reading 'Jm' and 'R'.

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:55 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Comments on Draft NEPRA (Prosumer) Regulations, 2025 U/s 47(3) of The Nepra Act, 1997.

From: M Arif <marfhs1051@gmail.com>
Sent: Tuesday, January 13, 2026 11:51 PM
To: registrar@nepra.org.pk
Cc: amina.ahmed@nepra.org.pk; NEP CHAUDHRY WASEEM MUKHTAR CHAIRMAN. <chairman@nepra.org.pk>; maqsoodanwarkhan@hotmail.com
Subject: Comments on Draft NEPRA (Prosumer) Regulations, 2025 U/s 47(3) of The Nepra Act, 1997.



13.1.2026

Registrar,
National Electric Power Regulatory Authority,
N.E.P.R.A.,
Nepra Tower,
Ataturk Avenue (East),
Sector G-5/1,

Subject: Comments on Draft NEPRA (Prosumer) Regulations, 2025 under Section 47(3) of the NEPRA Act, 1997



Sir,
Pursuant to the public notice issued under Section 47(3) of the NEPRA Act, 1997, inviting comments on the draft NEPRA (Prosumer) Regulations, 2025, the following submissions are respectfully offered for the Authority's consideration.

A review of the draft regulations indicates that they seek to repeal and replace the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015 through substantive modifications to the existing regulatory framework. While certain amendments may be justified from an operational or systemic perspective, several proposed changes raise concerns regarding regulatory

proportionality, investment certainty, and alignment with the statutory objectives of NEPRA, particularly the promotion of efficiency, competition, and consumer interest.

Para-wise comments are submitted below.

Clause 3(2): Capacity Limit of Distributed Generation Facility

The draft regulation proposes that the distributed generation facility shall not exceed 100% of the sanctioned load of the applicant's premises, as opposed to 150% under the existing regulations.

The apparent intent behind this amendment seems to be to decelerate the rapid growth in solar power installations. If the Authority's policy objective is indeed to apply brakes on solarization, then merely allowing installation up to 100% of the sanctioned load does not meaningfully achieve this objective. Instead, a more rational approach—if grid reliance is the intended outcome—would be to limit the facility to 50% of the sanctioned load, which would automatically compel greater reliance on the grid.

The proposed reduction from 150% to 100% neither effectively curtails solarization nor provides a coherent policy signal, while it certainly discourages efficient system sizing by prosumers.

Clause 7(1): Term of Prosumer Agreement

The proposed reduction of the agreement term from seven (7) years to five (5) years materially alters the commercial assumptions underpinning existing and prospective prosumer investments.

This change must be assessed in conjunction with Clause 14, which significantly revises the energy purchase price mechanism. A shorter agreement tenure, combined with lower export compensation, directly extends the investment payback period and undermines revenue predictability. Such cumulative regulatory changes adversely affect investor confidence and conflict with the principle of regulatory certainty, which is a recognized component of sound utility regulation.

Absent a demonstrated public-interest justification, retention of the existing seven-year term is more consistent with balancing system interests and consumer protection.

Clause 9: Protection Requirements

Clause 9 refers to Schedule-VII for protection requirements; however, the draft regulations contain only five (5) schedules, and Schedule-VII is not annexed.

This omission renders the clause incomplete and unenforceable in its present form. Given that protection standards directly affect grid safety and compliance obligations, the relevant schedule must be clearly specified and incorporated before finalization of the regulations.

Clause 14: Billing and Energy Purchase Price Mechanism

The draft replaces the existing mechanism—whereby net exported energy is valued at the National Average Power Purchase Price (NAPPP)—with a credit at the National Average Energy Purchase Price (NAEPP).

This proposed change creates a substantial disparity between the tariff at which electricity is sold to prosumers and the rate at which surplus electricity is purchased from them.

While tariff rationalisation is within the Authority's mandate, such a wide differential raises concerns of equity and proportionality, particularly where a significant number of prosumers remain net buyers over the billing period.

A more balanced and administratively efficient approach would be to:

- Net off energy imports and exports on a unit basis, and
- Apply the applicable DISCO tariff or NAEPP only to the residual net position.

This methodology would:

- Reduce financial exposure of DISCOs,
- Encourage self-consumption, and
- Avoid penalising prosumers who continue to rely on the grid.

This approach aligns with:

- Cost-causation principles,
- Reduction of cross-subsidization, and
- NEPRA's statutory duty to balance consumer protection with sector sustainability.

Clause 5 of Schedule-I: Mandatory Insurance Requirement

Clause 5 of Schedule-I to the draft regulations obliges prosumers to obtain and maintain appropriate insurance covering third-party personal injury and general commercial liability.

It is respectfully submitted that the said requirement is disproportionate, impracticable, and inconsistent with the statutory objectives of the NEPRA Act, for the following reasons:

1. Scale and Risk Profile of Prosumer Installations

The overwhelming majority of prosumers operate very small-scale distributed generation facilities, typically in the range of 5–10 kW, installed for self-consumption on residential or small commercial premises. The risk profile of such installations is fundamentally different from that of utility-scale or commercial power projects. Imposing commercial-grade insurance obligations on micro-scale installations lacks rational nexus with the actual risk involved.

2. Proportionality and Reasonableness under the NEPRA Act

Under Section 7(e) of the NEPRA Act, the Authority is required to protect consumer interests while promoting efficiency and economy. A mandatory insurance requirement for small prosumers imposes a recurring financial and administrative burden that is disproportionate to the scale of activity and undermines affordability and access to distributed renewable energy. The Superior Courts have consistently held that regulatory conditions must be proportionate to the objective sought to be achieved and must not impose excessive or unnecessary compliance burdens, particularly where the public interest can be secured through less intrusive means.

3. Market Non-Availability and Practical Impossibility

At present, there is no established insurance market in Pakistan offering standardized third-party and commercial liability products tailored to small-scale residential solar installations. Given the novelty of this requirement, insurance providers are likely to be reluctant to underwrite such risks, rendering compliance practically impossible for most prosumers and creating an artificial regulatory barrier.

4. Consumer Profile and Ease of Compliance

A significant proportion of prosumers are domestic consumers with limited formal education and regulatory awareness. Imposing insurance procurement and

maintenance obligations introduces complexity that is inconsistent with the principle of ease of compliance, which is integral to successful implementation of consumer-centric regulatory frameworks.

5. Existing Safeguards and Redundancy

Safety and liability risks associated with distributed generation are already addressed through:

- Technical standards and protection requirements,
- Installation certifications, and
- DISCO interconnection approvals.

6.

The addition of a mandatory insurance requirement therefore results in regulatory over-compliance without a commensurate increase in public safety.

Submission

In view of the foregoing, it is respectfully submitted that Clause 5 of Schedule-I be deleted in its entirety.

Conclusion

In view of the above, it is respectfully submitted that the highlighted provisions particularly Clauses 3(2), 7(1), 9 and 14 merit reconsideration to ensure that the final regulations are in compliance with:

- Sections 7, 31, and 34 of the NEPRA Act,
- Are supported by reasoned justification,
- Maintain regulatory certainty and proportionality, and
- Remain consistent with NEPRA's statutory mandate to protect consumer interests while promoting efficient and sustainable development of the power sector.

The undersigned requests that these comments be duly placed on record and considered during finalization of the Regulations.

Muhammed Arif Bilvani

0300-8229570

House No. 2-A, South Park Avenue,
Phase 2, D. H. A. Karachi.

For kind information, please.	For information
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<input checked="" type="checkbox"/> DG (Fin)	<input type="checkbox"/> DG (Fin)
<input checked="" type="checkbox"/> DG (A)	<input type="checkbox"/> DG (E)
<input checked="" type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (E)

For kind information, please.
 1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

Ref: Ther/NEPRA/26-001

Date: 08-01-2026

The Chairman

NEPRA

Islamabad

Registrar

Subject: REPLY AGAINST PROPOSED AMMENDMENT TO NET METERING POLICY UNDER PROSUMER REGULATIONS 2025

Dear Sir

Reference to above stated subject, NEPRA is planning to make some amendments in the Net metering policy with the help of CCPA, Power Division and other related institutions.

Under these regulations, Consumer is changed to Prosumer, Net metering to be changed to net billing, Buy Back rates to be revised from Rs. 25.98/unit to Rs. 11/unit, License validity to be reduced from 07 years to 05 years.

First of all, we appreciate working of net metering policy by the Govt in the previous years. It is also came to notice through NEPRA publications, that Govt. has also planned to go for more solar installations in the country, so that Electricity generation source should be optimized with those sources having less losses.

There are other source of electricity, by which, Govt is buying back electricity. i.e.

Fuel, Coal, Hydro, Wind, IPPs, RLNG, Nuclear, Thermal, Imported Coal, RFO, Neelum Jehulm, AJK-Jargan, Solar, Bagass etc.

Now with respect to above stated source of electricity Generation, we have capacity of Generation from all above sources is around 127,837 GWH (Source: NEPRA)

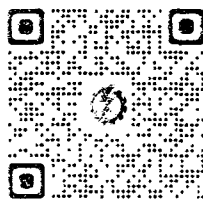
Out of the above capacity, Solar Generation is not more than 2% of total Generation from all sources of electricity.

In the reports of Performance Evaluation report and Statutory Industrial report 2025 published by NEPRA, all sources are highlighting same factors, which are involved in high losses of electricity. Which ultimately generating losses as Financial and technical to the

department
 +92 322 8585105

www.thermovision.pk

Office#04, 2nd Floor,
 Sardar Arcade, G11 Mkz,
 Islamabad



CHAIRMAN
 Date: 09-1-26

REGISTRAR OFFICE
 Date: 13.1.26

NEPRA
 Licensing Department
 Diary No. 331
 Date: 14-1-26

These losses are as follows:

- **Transmission and Distribution (T&D)** 18.31% for FY 2023-24
- **Low recovery** 92.44%
- **R/A from KE** Rs. 2,320.88 billion
- **Part Load Adjustment Charges: (PLAC)** Rs. 55.671 billion
- **Non-Project Missed Volume (NPMV)**
- **Liquidate Damages (LD)** Rs. 3797 Million
- **FREE ELECTRICITY TO CONSUMERS OF DISCOs**

TOTAL UNITS SOLD TO DISCOS: 94682 GWH

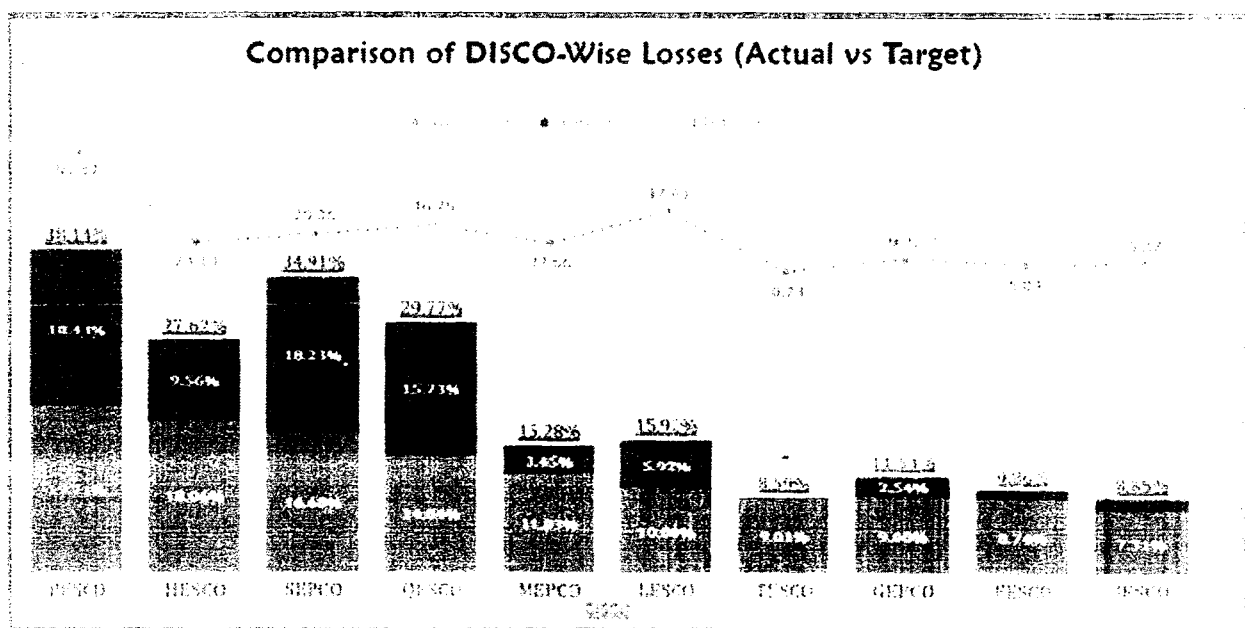
TOTAL UNITS BILLED FOR THE YEAR 2024: 94,682

GWH TOTAL AMOUNT BILLED FOR THE YEAR 2024:

4,167,357 M

TOTAL AMOUNT REALISED FOR THE YEAR 2024: 3,861,755 M

(93%) TOTAL DISTRIBUTION LOSSES: 21,148 GWH (18.26%)



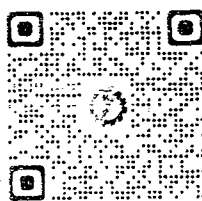
+92 51 2741725
+92 322 8585105



www.thermovision.pk



Office#04, 2nd Floor,
Sardar Arcade, G11 Mkz,



Buy Back rates:

Now we move towards the actual figure calculations of BUY BACK Rates by CCPA as mentioned in the reports;

Buy back rates are calculated with the components involved as Capacity purchase Price and Energy MIX price.

Capacity Purchase Price (CPP)

- The CPP covers the fixed costs associated with power plants, including fixed O&M, debt servicing, Return on Equity (RoE), Return on Equity During Construction (RoEDC), insurance, and other related expenses determined by NEPRA. These costs are fixed in nature, meaning they remain constant regardless of whether the plant is in operation
- the fixed cost may fluctuate due to variation in KIBOR, LIBOR, Exchange Rate and other relevant factors
- the per-unit CPP for RE plants is higher compared to thermal power plants. This is primarily due to the inherently low-capacity factor of RE plants,
- thermal power plants typically have higher capacity factors, often exceeding 92%.

Energy Purchase Price (EPP)

- The EPP is generally incurred only when the plants are operational.

The main factor involved is the higher the cost of non-operational plants and higher import cost and other related factors as well.

Now all the demand is raised properly, so that all the plants become proper operational and avoiding T&D losses, these cost factor can be reduced.

The EPP for RE power plants is almost zero, as they rely on natural resources such as wind, solar, or hydro, which do not incur fuel costs.

Efforts to be done to overcome above High cost factors

It is essential to fully utilize the generation capacity from nuclear, Thar coal, and indigenous gas power plants, while minimizing dependence on more expensive fuel-based plants such as RLNG, imported coal and RFO.



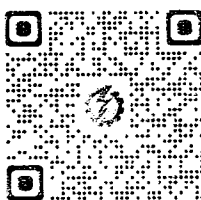
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The utilization factor of all combined thermal power plants, including nuclear power plants, during the first and second quarters of FY 2024-25 remained at 45.7% and 32.7%, respectively. In contrast, the utilization factor for renewable energy (RE) plants, including hydro, wind, solar and bagasse, stood at 54.4% and 27.6%, respectively. The lower utilization of thermal power plants was primarily attributed to lower demand and AT&C-based load shedding, while the suboptimal performance of RE plants stemmed largely from the unavailability of primary energy resources and challenges in energy evacuation, particularly for wind power plants. Electricity demand fluctuates across seasons and times of day, making it essential to carefully plan power generation capacity. Higher plant utilization typically leads to a lower per-unit cost of CPP, while lower utilization drives the cost higher. Therefore, when planning the country's power generation capacity, it is necessary to focus on optimizing the efficient use of the planned capacity to achieve

Details of Capacity, Energy, and EPP Mix in CPPA-G System, Along with the Combined Utilization Factor of Power Plants Across Different Technologies – July to Dec, 2024

Annex-II



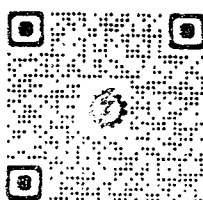
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a higher utilization factor. This approach is essential to lower the per-unit CPP, improve system reliability, and ensure a more cost-effective and sustainable energy supply.

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ENERGY CONSUMED BY ALL DISCOS FOR 2024 123,375 GWH

TOTAL UNITS PURCHASE THROUGH NET METERING 1073.50 GWH

TOTAL UNITS PURCHASE THROUGH NTDC/CPP/NET METERING: 115,831GWH

- WHICH IS HARDLY 1% IN TOTAL PURCHASE

Power Source from Different Sources other than Net metering (40287 MWH)

Big Challenges

- One of the biggest challenges facing Pakistan's electric power sector is the generation capacity, which is currently underutilized
- NEPRA has consistently highlighted enduring issues within the power generation sector, such as violations of Economic Merit Order (EMO), excessive capacity payments, payments related to Non-Project Missed Volume (NPMV), Partial Load Adjustment Charges (PLAC), as well as issues involving CPPA-G and KE
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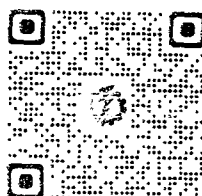
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CONTRIBUTION RATIO OF 71% FROM THERMAL TO 29% FROM RE

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- NET METERING UNITS IMPORT VS EXPORT FOR 2024
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Net metering facts and figures

The integration of renewable energy (RE) sources, such as solar power through the net-metering regime, reflects Pakistan's commitment to a greener future. As of June 2024, over 156,372 distributed generation solar facilities with installed capacity exceeding 2,200 MW, including K-Electric Limited (KE), have been integrated with the grid through net-metering. The ambitious goals outlined in the approved Indicative Generation Capacity Expansion Plan (IGCEP) 2022-31, targeting an additional 3,420 MW by 2031, highlight a strategic shift towards sustainable energy through RE resource. However, emerging challenges such as transformer overloading, generation losses from on-grid DG facilities during load-shedding, and uncertainty in policy decisions may undermine these efforts.

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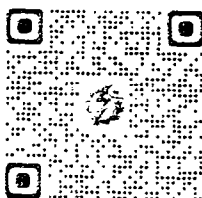
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Economic Characteristics of Net-Metered Solar

The following points underscore the **economic benefits of rooftop solar installations**:

- **Zero Energy Purchase Price (EPP)** due to the absence of fuel costs.
- **No capacity payment (CPP) obligations**, which otherwise contribute to system costs.
- **No exposure to foreign exchange risk or volatile fuel price fluctuations.**
- **No Non-Project Missed Volume (NPMV) or Part Load Adjustment Charges (PLAC)**, which add additional costs to the system.

These attributes, as highlighted by the Authority in previous consultations, place **net-metered solar** at a distinct advantage in terms of **low cost** and **risk mitigation**.

ANOTHER INITIATIVE BY GOVT TO INDUCT MORE SOLAR INTO THE GRID

Fast Track Solar Initiatives:

The Government has approved the Framework Guidelines for Fast-Track Solar PV Initiatives 2022 for fast-track deployment of solar PV. In this regard, as a first step, a 600 MWp solar project is planned to be developed at Kot Addu/ Muzaffargarh on G2G mode

CONCLUSION:

In light of the aforementioned observations, it is respectfully recommended that:

1. **Net metering should be retained as a policy mechanism that encourages distributed solar generation without imposing additional costs or inefficiencies on the system.**
2. **Focus should be redirected to improving T&D losses, recovery rates, and transmission system upgrades** as these remain the **major contributors** to cost escalation in the power sector.
3. Further analysis is required on the **merit-order management** of generation resources, including addressing the underutilization of existing thermal plants and addressing **capacity payment inefficiencies**.

Thanking you

Asif Javed



CEO Thermovision Pvt Ltd.
+92 322 8585105

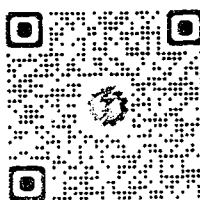


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GOVERNMENT OF PAKISTAN
PRIVATE POWER & INFRASTRUCTURE BOARD



No.B/3/2/GC/19

From

Sheeraz Anwar
Director General-Solar

To

1- Registrar-1, NEPRA, Islamabad

SUBJECT: THE NEPRA (PROSUMER) REGULATIONS, 2025

Forwarded please:

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☐ For information

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☐ DG (Fin)

☐ M.A.

☐ Dir. (LT)

☐ Consult (Tech)

☐ Consult (TCGM)

For kind information, please.

☒ Chairman

☐ 2. M (Tech)

☒ 3. M (Law)

☒ 4. M (Dev)

Islamabad, the 13th January, 2026

REGISTRAR OFFICE
Diary No: 796
Date: 13/1/26

This is with reference to NEPRA letter No. NEPRA/DG(Lic)/NMR-01/07-59 dated January 02, 2026, regarding the subject matter.

2. At the outset, PPIB supports the proposed transition from Net Metering to Net Billing as a progressive step towards establishing a balanced, transparent, and sustainable framework for Distributed Energy Resources (DERs). The proposed approach maintains reasonable incentives for prosumers while safeguarding the interests of other grid-connected consumers and ensuring the long-term financial and operational stability of the power sector. PPIB's comments on the draft Regulations are provided below for the consideration of the Authority:

I. Reference to IEEE Standards: Clause 9(5) of the draft Regulations requires inverter compliance with IEEE 1547-2003. It is recommended that this reference be updated to IEEE 1547-2018, as the latest version incorporates significant enhancements related to smart inverter functionality, grid support features, interoperability, and communication requirements. This version is widely adopted internationally and is more aligned with modern grid operational needs.

II. Applicability of Grid Code and Distribution Code: The draft Regulations refer to compliance with the Grid Code at various places. However, the NEPRA Grid Code is applicable to systems operating at 66 kV and above, whereas the NEPRA Distribution Code governs networks at 132 kV / 66 kV / 11 kV / 0.4 kV.

Furthermore, under Clause 2(c), an "Applicant" is defined as a domestic, commercial, or industrial consumer connected at 3-phase 400 V or 11 kV. Therefore, it is recommended that the Regulations explicitly require compliance with the relevant applicable code, i.e., the Grid Code or the Distribution Code, as appropriate, to avoid ambiguity and ensure regulatory clarity.

III. Distribution Transformer Loading Criterion: Clause 3(5) of the draft Regulations specifies an 80% distribution transformer loading threshold, beyond which no additional applications shall be permitted. While the intent of this provision from a system protection and planning margin perspective is understood, the application of a fixed threshold based solely on connected DER capacity does not accurately reflect actual network loading or reverse power flow conditions. In practice, power exported towards the distribution transformer is limited to the surplus generation remaining after serving the instantaneous localized

feeder load and is therefore inherently time-dependent. As a result, connected DER capacity alone is not a reliable indicator of transformer loading or the likelihood of sustained reverse power flow.

It is therefore recommended that DISCOs be encouraged to develop feeder-wise / grid-wise Hosting Capacity Maps (HCMs) based on detailed technical and time-series studies. Such an approach would enable identification of actual network constraints on a case-by-case basis, rather than imposing a uniform threshold across all feeders irrespective of their individual loading profiles and network characteristics.

IV. Application Processing Timelines: Pursuant to Clause 3(6) of the Regulations, a period of 15 days has been prescribed for the initial technical review, subsequent to the 5 days allocated for verification of the completeness of the application documents, and an additional 3 days for communication in case the application is found to be incomplete after review. These cumulative timelines appear to be relatively on the higher side. It is therefore suggested that the timelines prescribed under each step be rationalized and further streamlined to enable early licensing, improve procedural efficiency, and facilitate timely deployment for consumers.

V. Licensing Mechanism for Small-Scale Systems: Pursuant to S.R.O. 1448(I)/2021, the Federal Government, after consultation with NEPRA, has notified that distributed generation facilities using solar or wind power up to 25 kW, connected to the network of a distribution licensee through a net metering facility, do not require a generation licence from NEPRA.

The draft Regulations do not explicitly reflect this exemption, which may create the perception that all prosumers are required to obtain a licence. It is therefore recommended that this exemption be clearly incorporated in the updated Regulations to ensure continuity, regulatory consistency, and clarity for consumers.

VI. Metering Requirements: Pursuant to Clause 5(a)(i), consumers are permitted to install a standard bidirectional meter for net billing purposes. However, in view of the fact that DISCOs are already undertaking large-scale deployment of Advanced Metering Infrastructure (AMI) meters under prevailing government policy, and are increasingly requiring existing net-metered consumers to migrate to AMI meters, this approach may result in duplication of costs for consumers.

It is therefore recommended that the revised Regulations mandate the installation of AMI meters as a compulsory requirement for all new net billing/prosumer connections. This would ensure uniformity across DISCOs, avoid duplication of costs, and enhance grid visibility, billing accuracy, and overall system monitoring capabilities.

3. PPIB remains available to provide any additional technical input or clarification as may be required by the Authority to facilitate the effective implementation of these Regulations.



Sheeraz Anwar
Director General-Solar
Ph:051 9202082

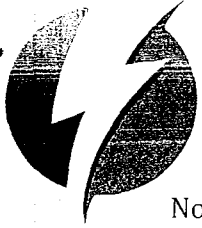
Copy for information to:-

- 1- Secretary, MOEPWD, Islamabad
2- Managing Director-PPIB, PPIB, Islamabad



Sheeraz Anwar
Director General-Solar
Ph:051 9202082

Wasim Anwar Bhinder
Register-1
16 January 2023, 10:33:11 AM



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Pakistan Alternative Energy Association
— CRAFTING SUSTAINABLE FUTURE —

No. PAEA/EDB/2026/03

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For kind information, please.

☒ 1. Chairman ☒ 2. M (Tech)
☒ 3. M (Law) ☒ 4. M (Dev)

13-01-26

January 8, 2026

The Chairman

National Electric Power Regulatory Authority (NEPRA)
NEPRA Tower G-5/1,
Islamabad.

Subject:

REPLY AGAINST PROPOSED AMMENDMENT TO NET METERING POLICY UNDER PROSUMER REGULATIONS 2025

Dear Sir

Reference to Draft Policy amendment under Prosumer Regulations 2025, NEPRA is planning to make some changes in the Net metering policy.

Under these regulations, Consumer is changed to Prosumer, Net metering to be changed to net billing, Buy Back rates to be revised from Rs. 25.98/unit to Rs. 11/unit, License validity to be reduced from 07 years to 05 years, all licenses will be validated through NEPRA including residential as well.

First of all, we appreciate working of net metering policy by the Govt in the previous years. It is also came to notice through NEPRA publications, that Govt. has also planned to go for more solar installations in the country, so that Electricity generation source should be optimized with those sources having less losses.

Other major sources of electricity generation are as follows;

Fuel, Coal, Hydro, Wind, IPPs, RLNG, Nuclear, Thermal, Imported Coal, RFO, Neelum Jehulm, AJK-Jargan, Solar, Bagass etc.

Now with respect to above stated source of electricity Generation, we have capacity of Generation from all above sources is around **127,837 GWH (Source: NEPRA)** Out of the above capacity, Solar Generation is not more than 2% of total Generation from all sources of electricity i.e. **64GWH**. In the reports of Performance Evaluation report and Statutory Industrial report 2025 published by NEPRA, all sources are highlighting same factors, which are involved in high losses of electricity. Which ultimately generating high losses as Financial and technical to the department.

Registrar

[Signature]

CHAIRMAN

Dy No. 290

Date: 09-1-26

WhatsApp: +92-317-1177240, Tel: 051-6127822

Email: info@aeapakistan.org Web: http://aeapakistan.org

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Diary No: 225
Date: 13-1-26



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These losses are as follows:

- **Transmission and Distribution (T&D)** 18.31% for FY 2023-24
- **Low recovery** 92.44%
- **R/A from KE** Rs. 2,320.88 billion
- **Part Load Adjustment Charges: (PLAC)** Rs. 55.671 billion
- **Non-Project Missed Volume (NPMV)**
- **Liquidate Damages (LD)** Rs. 3797 Million
- **FREE ELECTRICITY TO CONSUMERS OF DISCOs**

Prosumer:

By changing the policy, ROI of the prosumer will be raised from current 1.5-2 years to 4-5 years as he will be paying electricity bills at higher Off peak and peak time rates and selling lower cost Solar Generated electricity to the DISCOs.

Net metering to Net Billing:

By converting from Net metering to Net Billing, main bad impact to the Solar Industry, declining the customer demand to shift to Solar as the prosumer was going for Solar, only to cut down higher electricity bills. Now as per change to Net Billing, Prosumer will not be beneficial of low cost solar energy. Net billing rumors has already created bad and negative impact in the industry.

Buy Back rates:

Now we move towards the actual figure calculations of BUY BACK Rates by CCPA as mentioned in the reports;

Buy back rates are calculated with the components involved as Capacity purchase Price and Energy MIX price.

Capacity Purchase Price (CPP)

- The CPP covers the fixed costs associated with power plants, including fixed O&M, debt servicing, Return on Equity (RoE), Return on Equity During Construction (RoEDC), insurance, and other related expenses determined by NEPRA. These costs are fixed in nature, meaning they remain constant regardless of whether the plant is in operation
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Now all the demand is raised properly, so that all the plants become proper operational and avoiding T&D losses, these cost factor can be reduced.

The EPP for RE power plants is almost zero, as they rely on natural resources such as wind, solar, or hydro, which do not incur fuel costs.

In the month of June 2025, NEPRA has already revised rates of Buy Back for year 2025-2026 from Rs. 27/unit to Rs. 25.98/unit. Now after 06 months, NEPRA is also planning to cut down this buy back rate to further Rs. 14.98/unit to Rs. 11/unit. Which includes (As per NEPRA) is only Energy Cost and cutting down Capacity charges. Which ultimately creates Negative working behavior in the costing and book value of the Buy back rate. This will also create major impact of Off Grid and Behind the meter installations.

Further to be disclosed by NEPRA, weather they are going to change this Buy back rate for other source of electricity or just creating this impact on Solar source?

Secondly In case of rate revision, this should be proportionate as per actual Off Peak rates. As DISCOs are charging Off Peak rate @45/unit (Ex taxes) and buying back from Prosumer @Rs.11/unit (No tax).

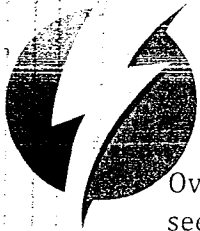
License Renewal

Previously all license from 1KW to 25KW for residential only were treated by relevant DISCOs. Now all cases will be entertained by NEPRA itself. This will again create more delays in the process of net metering as NEPRA takes almost 01 month to process a license. Whereas DISCOs managed these licenses within 15 to 20 days max.

License validity from 07 years to 05 years makes also a difference in economics of the prosumer.

Efforts to be done to overcome above High cost factors

It is essential to fully utilize the generation capacity from nuclear, Thar coal, and indigenous gas power plants, while minimizing dependence on more expensive fuel-based plants such as RLNG, imported coal and RFO.



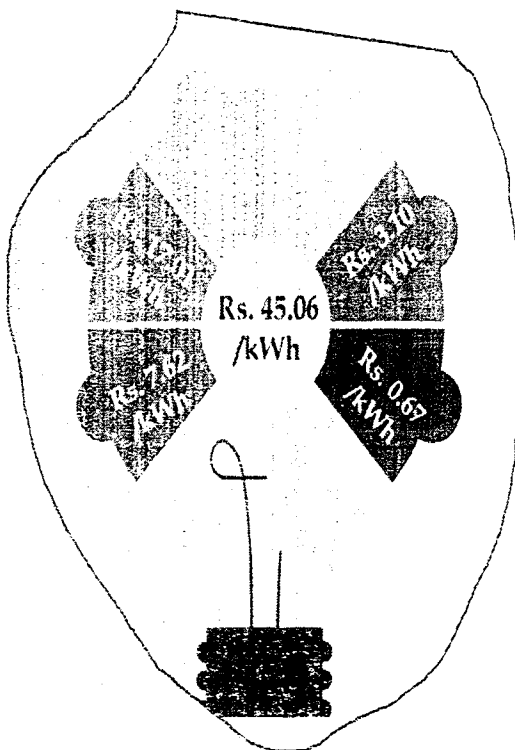
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Overall on this report from NEPRA in Performance Evaluation Report for 2024, RE seems to be more effective solution due to lower cost of operation and avoiding higher cost like imported fuel and coal and not utilizing power plants on their full capacity.

As per NEPRA, CCPA-G, Power Division, NTDC, Renewable First record all data from RE and Other sources of electricity generation in terms of Energy Mix, EPP, Capacity mix and utilization of plants. RE is the lowest factor in above all.

The utilization factor of all combined thermal power plants, including nuclear power plants, during the first and second quarters of FY 2024-25 remained at 45.7% and 32.7%, respectively. In contrast, the utilization factor for renewable energy (RE) plants, including hydro, wind, solar and bagasse, stood at 54.4% and 27.6%, respectively. The lower utilization of thermal power plants was primarily attributed to lower demand and AT&C-based load shedding, while the suboptimal performance of RE plants stemmed largely from the unavailability of primary energy resources and challenges in energy evacuation, particularly for wind power plants. Electricity demand fluctuates across seasons and times of day, making it essential to carefully plan power generation capacity. Higher plant utilization typically leads to a lower per-unit cost of CPP, while lower utilization drives the cost higher. Therefore, when planning the country's power generation capacity, it is necessary to focus on optimizing the efficient use of the planned capacity to achieve a higher utilization factor. This approach is essential to lower the per-unit CPP, improve system reliability, and ensure a more cost-effective and sustainable energy supply.



- **Energy Charges:**
Fuel + Variable O&M
- **Capacity Charges:**
Fixed O&M, ROE, ROEDC, IDC, Insurance, Debt Servicing etc.
- **Transmission Charges:**
O&M, Depreciation, RoE, Interest, Other Income, Prior Year Adjustment
- **Market Operator Fee:**
O&M, Other Income, Prior Year Adjustment
- **DISCOs Margin:**
O&M, Depreciation, RoE, Interest, Other Income, Prior Year Adjustment
- **Prior Year Adjustment:**
Under/Over Recovery due to delay in notification/over under sales etc.
- **Average Taxes/Surcharge/FPA/QTA**



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— CRAFTING SUSTAINABLE FUTURE —

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These attributes, as highlighted by the Authority in previous consultations, place **net-metered solar** at a distinct advantage in terms of **low cost** and **risk mitigation**.

Another Fast Track initiative already taken by Govt. is to induct another 600MW Solar Projects to be developed at Kot Addu/ Muzaffargarh on G2G bases and many more. This is only happening as of low loss generation strategy from Green Energy concept.



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Pakistan Alternative Energy Association
SUSTAINABLE FUTURE

CONCLUSION:
In light of the aforementioned observations, it is respectfully recommended that:

1. **Net metering** should be retained as a **policy mechanism** that **encourages distributed solar** generation without imposing additional costs or inefficiencies on the system.
2. **Focus should be redirected to improving T&D losses, recovery rates, and transmission system upgrades** as these remain the **major contributors** to cost escalation in the power sector.
3. Further analysis is required on the **merit-order management** of generation resources, including addressing the underutilization of existing thermal plants and addressing **capacity payment inefficiencies**.
4. Govt. must focus on other relevant issues like managing IPPs and other losses and recoveries from all sources.
5. Govt. department data should be accurate and feasible so that proper demand supply mechanism should be generated to create proper demand for already operative plants.
6. Buy back rate revision and policy changes for this Prosumer regulations 2025 will not be a great loss for the Government in terms of technical and feasible.

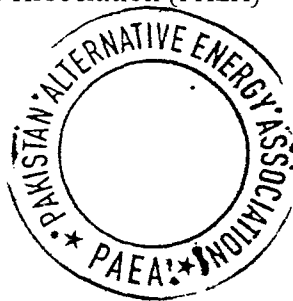
Pakistan Alternative Energy Association is always available to work with the Government of Pakistan, specially with NEPRA, NTDC, Ministry of Power division and other related Govt institutions, so that all electricity matters related to losses incur and management of Generations, Transmission, distribution and other factors to be triggered properly.

Submitted with due respect,

Sincerely,

For and on behalf of
Pakistan Alternative Energy Association (PAEA)

Mir Ahmad Shah
Secretary General



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Your reference:
Our reference: GIZ-19

12th January 2026

**Subject: Submission of GIZ recommendations on the Prosumers
Regulations, 2025**

Dear Sir,

GIZ project "Digitalisation and Decarbonisation of Power Distribution Networks (DEDI)" aims to support public sector stakeholders in Pakistan by developing new regulations and reviewing existing ones for the power sector. These regulations focus on improving operational efficiency, integrating renewable energy, implementing digitalization measures, promoting environmental sustainability, and enhancing the sector's economic efficiency.

Within this project, GIZ is advising NEPRA on the revisions of the existing net-metering regulations. The Prosumer Regulations, 2025 are currently undergoing a public consultation process.

Please find enclosed the GIZ recommendations on the draft of NEPRA Prosumer Regulations, 2025, after a thorough review of the draft regulation by our experts.

We would like to express our sincere appreciation to NEPRA for allowing GIZ to participate in the consultation process.

Kind regards,



Olena Gordiienko
Project Manager, DEDI Project



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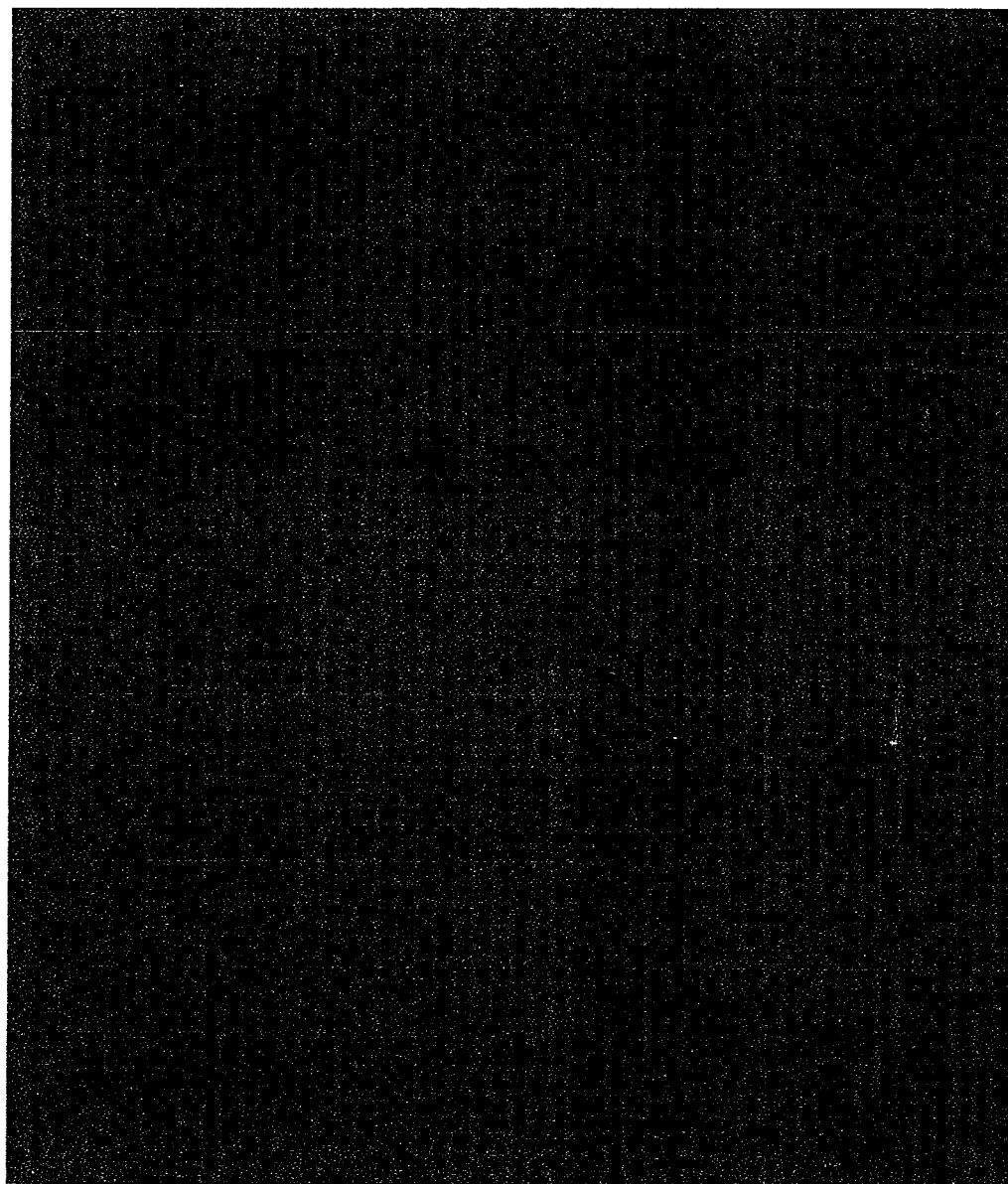
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GIZ Recommendations NEPRA Prosumer Regulations, 2025



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As at

January 2026

Text

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Felix Hohl (INTEGRATION environment & energy GmbH)

On behalf of the

German Federal Ministry for Economic Cooperation and Development (BMZ)

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1 Introduction

1.1 Background

The GIZ project "Digitalisation and Decarbonizations of Power Distribution Networks" aims to support public sector stakeholders in Pakistan by developing new regulations and reviewing existing ones for the power sector. These regulations focus on improving operational efficiency, integrating renewable energy, implementing digitalization measures, promoting environmental sustainability, and enhancing the sector's economic efficiency.

Within this project, GIZ is advising NEPRA on the revisions of the existing prosumer regulations. The 2025 prosumer regulations are currently undergoing a public consultation process.

At this point we want to express our sincere appreciation to NEPRA for allowing GIZ to participate in the consultation process.

1.2 Purpose and Structure of this Document

This document contains recommendations by GIZ on the NEPRA Prosumer Regulations, 2025. The recommendations are formally submitted as part of the ongoing public consultation process.

Recommendations are provided in a two-column layout:

- The left column provides the text / section of the NEPRA Prosumer Regulations, 2025 next to **Potential Issues** identified by GIZ.
- The right column provides **Recommendations** and **Rationale** for improvement.

2 Review and Recommendations

No	Regulation and Potential Issues	Rationale and Recommendations
1	<p>14.(1) (b) the kWh supplied by prosumer to the licensee, shall be billed in accordance with the national average energy purchase price.</p> <p>Potential Issue</p> <p>"National average energy purchase price" is nowhere specified in this document. There is no explanation, or reference, or example.</p> <p>In this context the group of prosumers operating $SPV \leq 1$ MWp at thousands if not hundred thousand separate locations, are viewed as the joint owners of one utility scale SPV with special privileges as outlined in this regulation. Add this utility scale SPV as "Solar (Prosumer)" in the national statistics of power plants with a kWh (sent) price of 14.(1) (b).</p>	<p>Recommendation</p> <p>It is recommended that the "National average energy purchase price" under 14.(1)(b) is defined as "the weighted average (wavg) price of avoided fuel cost for the generation of 1 kWh of electricity from any renewable or fossil (solid, liquid, or gaseous) fuel procured to generate electricity by a power plant, connected to a power distribution or transmission network, that injects all or part of the generated electricity into the network the power plant is connected to.</p> <p>Rationale</p> <p>The recommended definition includes all traditional fuels such as natural and liquefied gas, biogas, nuclear fuel rods, any type of coal, biomass and agricultural residues, and all "fuel-less" power plants such as solar, wind and hydro power plants. All fuel-less power plants enjoy 0 Rs/kWh fuel costs. It also includes all the solar photovoltaic power plants (SPV) ≤ 1 MWp under this regulation and all SPV > 1 MW i.e. all utility scale SPV.</p> <p>This export price is most likely always the least cost electricity source in the market for licensees to procure because the more "fuel-less" distributed generation facilities are operating the lower the national average energy purchase price.</p>

Sources	Generation		Fuel Cost	
	Mia Units		Mia Rs. Rs/kWh	
Biogas	125		1,292	10.37
Gas	1,258		12,617	10.03
Hydel	5,314			
Imp Coal	1,489		23,180	15.57
Thar coal	1,826		21,807	11.94
Nuclear	1,688		2,969	1.76
RLNG	2,995		76,319	25.48
RPO	370		11,772	31.81
Solar	94			
Wind	526			
Import	29		875	30.33
Total	15,713		150,831	9.60
UOSC/MOR/Losses	440			
Grand Total	15,273		150,831	9.88

No	Regulation and Potential Issues	Rationale and Recommendations
2	<p>7.(1) The term of Agreement between Prosumer and Licensee shall be five years with effect from the date of commissioning of DG facility. At the expiry of initial term, the Agreement may be renewed between Prosumer and Licensee for another term of five years and so on unless the Parties terminate the Agreement.</p> <p>7.(2) At the expiry of the initial term, the agreement may be renewed between the prosumer and the licensee for another term of five years and so on with mutual consent of the licensee and prosumer.</p> <p>Potential Issue 1</p> <p>The approach diverts significantly from a more common strategy of a 20-years term agreement corresponding with the average commercial life of a prosumer SPV facility.</p> <p>8. Termination of agreement. — (1) The prosumer may terminate the agreement upon thirty days' written notice if it decides to discontinue the sale of electricity to the licensee.</p> <p>(2) The licensee may terminate the agreement upon thirty days' written notice subject to prior approval of the Authority</p> <p>Potential Issue 2</p> <p>This regulation may have been necessary under the legacy netting-energy regulation but is redundant under the prosumer net-billing regulation. It will only prevent licensees to procure least cost electricity in the market from prosumers. It also prevents prosumers and financial advisors to calculate the production costs of 1 kWh electricity over the operational life of the SPV and compare with the 14.(1) (b) price.</p>	<p>Recommendations</p> <p>Repeal 8. and do not replace it.</p> <p>Repeal 7.(1)</p> <p>Repeal 7.(2) and</p> <p>Replace 7.(1): The term of Agreement between Prosumer and Licensee shall be 20 years with effect from the date of commissioning of the distributed generation facility.</p> <p>Rationale</p> <p>Based on the proposed export price 14.(1) (b) under Table 1 there is no need to play it safe and restrict the term of the agreement to very short terms and "so-on" renewals. The proposed kWh exported price (Table 1) is based on the avoided fuel cost of all other power plants injecting power into the public networks.</p> <p>The group of prosumers operating SPV<=1 MWp at thousands if not hundred thousand separate locations, are the joint owners of one very large utility scale SPV with special privileges as outlined in this regulation.</p> <p>This very large utility scale SPV shall be accounted for in the national statistics of power plants with a kWh(sent) price of 14.(1)b. The larger the capacity of this "Solar(Prosumer)" power plant the more lower cost electricity is available to the licensees. The associated network issues namely possible increased technical losses, revers flow, lacking ramp up, ramp down control and lack of automated demand side management are technical issues that one should not blame the Solar(Prosumer) for.</p> <p>The sub-regulation 14.(1) (b) export price seems to be the least cost kWh supply price of any power plant in Pakistan based on the forecasts of "Decision of the Authority in the matter of request filed by CPPA-G for Power Purchase Price forecast for the FY 2025-26." This single "Solar (Prosumer)" power plant will lower the energy procurement cost of licensees and benefit all consumers, not only the prosumers. However the SPV output is non-dispatchable. More balancing power is needed. That risk is minimized by hydro power, pumped storage and/or a VPP Table 16 and 16.4</p>

No	Regulation and Potential Issues	Rationale and Recommendations
3	<p>3.(2) The capacity of a proposed distributed generation facility shall not exceed the sanctioned load of the applicant's premises.</p> <p>Potential Issue 1 The regulation does not cover the scenario that a consumer has successfully asked for an increase of its sanction load prior to filing an application under 3.(1)</p> <p>3. (3) An applicant proposing to install a distributed generation facility with an installed capacity of 250 kW or above shall be obligated to conduct and submit a load flow study carried out through the licensee or any reputable consultant registered with Pakistan Engineering Council.</p> <p>Potential Issue 2 1. Replace KW by kW because there is no such capacity unit KW but only the derived unit kW =kWh/h. For SPV facilities the internationally accepted and certifiable unit is the kWp of the installed solar panels. 2. To whom shall the applicant submit the load flow analysis? 3. The term "load flow" refers to analysis of the kWh imported and kWh exported metered on an hourly basis i.e. kWh/h=kW.</p>	<p>Recommendation Repeal 3.(3) and replace by: The licensee will prepare for the applicant for distributed solar photovoltaic (SPV) facilities with an installed capacity of 10 kWp or above a prognosis of the expected kWh imported and kWh exported by the prosumer that complies with "NEPRA Guidelines for determination of electricity import and export flows of a SPV facility" of <some future date in 2026></p> <p>Add 3.(3)(a): The applicant will pay a fee to licensee for its services as specified by the Authority</p> <p>Rationale 1. Consultants will not be able to conduct a load flow analysis 3.(3) without at least one full calendar year of the past year's hourly electricity consumption data of the applicant. This data is available from the licensee. The hourly data is averaged to get daily, weekly or monthly data 2. The same analysis is required for the monthly SPV output. 3. Table 18 illustrates the result of a teaching hospital compound in a tropical setting with 82% of electricity supply consumed by air-conditioners.</p> <p>Add 3.(6) Licensee is obliged to disconnect or require the disconnection of an already commissioned distributed generation facility from its distribution system at any time, with or without notice, if it is established beyond doubt that the design capacity of the distributed generation facility exceeds the sanctioned load.</p> <p>Add 3.(7) Licensee is obliged to disconnect or require the disconnection of an already constructed distributed generation facility at any time and with or without notice if it is established beyond doubt that the distributed generation facility has been approved and registered by Schedule II and/or Schedule III prior to the date of its construction.</p>

No	Regulation and Potential Issues	Rationale and Recommendations
4	<p>5. (a) allow any of its consumers to establish distributed generation facilities to be interconnected with its distribution system using either (i) a standard meter capable of registering the flow of electricity in two directions, or (ii) two separate meters one for selling electricity to the licensee and other for purchasing electricity from the licensee</p> <p>Potential Issue 1</p> <p>1.The wording establish is too strong. Any consumer should only be allowed to request a licensee for permission to establish a distributed generation facility.</p> <p>2. The wording, (i) a standard meter capable of registering the flow of electricity in two directions is legally not enforceable as long as the standard is not referenced, or a technical guideline exists, or a positive list of sanctioned meters is published by the licensee</p>	<p>Recommendation</p> <p>Repeal 5.(a)</p> <p>Replace 5.(a) Allow any of its consumers to apply for permission for a planned distributed generation facility to operate and interconnect with its distribution system using (i) a 2-channel bi-directional electronic meter capable of registering the flow of exported and imported electricity at any instance of time in all four quadrants of the power plane and (ii) installing only meters which have been sanctioned by the licensee and (iii) comply with the national standards for revenue meters to balance a prosumer's export revenues with import costs based on Rule 14.</p> <p>Rationale</p> <p>Bi-directional meters for SPV are widespread State-of-the-Art meters for real-time monitoring. These meters are also able for remote management and accurate accounting (revenue meter) of kWh exported and kWh imported by a prosumer. Communication and data transmission via WIFI, cellular phone, Ethernet or RS485. It is not possible for a licensee to provide services without such meters. (Table 8 and Table 17)</p>

No	Regulation and Potential Issues	Rationale and Recommendations
5	<p>9. Protection requirements. — (1) The protection and control diagrams for the interconnection of the prosumer shall be in accordance with the provisions of the grid code and applicable documents and approved by the licensee prior to commissioning of the proposed interconnection facilities and a single line diagram as specified in Schedule-VII.</p> <p>Potential Issues</p> <ol style="list-style-type: none"> 1. There is no Schedule-VII 2. Which specific provisions of the Grid Code that is not covered by the Distribution Code applies for distributed generation facilities <=1 MW under this Prosumer Regulation ? 	<p>Recommendation</p> <p>1. For preparation of Schedule-VII it is recommended to follow No.4(14) /2025-POLICY Islamabad, the 13th of March, 2025 Annex IV Sr.4 concerning protection and control of a SPV</p> <div data-bbox="396 257 647 1243"> <p>4</p> <p>Technical Specification</p> <p>NEPRA shall ensure the incorporation of updated inverter standards under the legal and regulatory framework, requiring all new net metering consumers to comply. The updated standards-compliant inverters shall facilitate real-time grid interaction, including voltage and frequency regulation, incorporate anti-islanding protection to prevent back-feeding during outages, enable remote monitoring and control by the Distribution Company, and support communication interfaces such as Wi-Fi, GSM, or IoT-based monitoring systems.</p> </div> <p>2. State-of-the-Art inverters have sophisticated built-in integrated protection and control features as well as offer communication protocols satisfying the technical specification mentioned above. These inverters offer interesting features that are important for prosumers and advisors to design and operate the SPV in such a way that the cost-effectiveness of the SPV is maximized. The below video reference illustrates the power and flexibility of import and export strategies offered even for smaller kWp capacities. https://www.youtube.com/watch?v=zP4PeezwZJc</p> <p>Rationale</p> <p>Referring to provisions of the grid code or distribution code is not expedient in the case of an SPV power plant-. It requires a licensee and/or NEPRA to prove that the inverters sold and installed in Pakistan comply with the national grid code and/or distribution code concerning protection and control. Inverter manufacturers do not care about national codes but get their inverters certified based on the most widespread international codes. See Table 6 and explanations for details.</p>

No	Regulation and Potential Issues	Rationale and Recommendations
6	<p>9. (5) The grid connected inverters and generators shall comply with Underwriter Laboratories UL 1741 standard (Inverters, Converters, Controllers and Interconnection System Equipment for Use with Distributed Energy Resources) which addresses the electrical interconnection design of various forms of generating equipment, IEEE 1547 2003, IEC 61215, EN or other international standards.</p> <p>Potential Issues</p> <ol style="list-style-type: none"> 1. This text references the outdated (2003) version of standard IEEE 1547 and generic UL 1741 testing procedure by the Underwriter Laboratory, USA. 2. " ...or other international standards..." is a legally void and non-enforceable statement unless these other international standards are named. 3. The IEC 61215 is the international standard for the design qualification and type approval of terrestrial photovoltaic (PV) (solar) modules, setting performance and reliability requirements for long-term outdoor use. 4. The quality of solar panels should not be regulated by NEPRA because it is the decision of a prosumer which quality grade A, B or C or no quality certification at all is selected. Regulating solar panel quality may seriously disturb future local sales. 	<p>Recommendation</p> <p>Repeal 9.(5)</p> <p>Replace by 9.(5)(i):</p> <p>"The grid connected inverters and battery storage shall comply with Underwriter Laboratories UL 1741 standard and supplement SB test to confirm compliance with IEEE 1547-2018 covering features like frequency/voltage support and communication protocols for better grid stability and interoperability."</p> <p><i>Explanation:</i></p> <p>IEEE 1547 SA and SB, 2018 is the current international technical standard for interconnecting a distributed generation facility of a prosumer with the grid. It establishes the criteria and requirements for performance, operation, testing, safety, control, communication and maintenance. SB inverters can actively help stabilize the grid during disturbances, not just disconnect, making it the preferred standard. SB is broader and more stringent, incorporating all SA features plus more complex communication and control functions.</p> <p>UL 1741 Supplement SB is the standardized test that proves an inverter and/or battery storage complies with IEEE 1547, 2018. Grid code compliance, on the other hand, is project-specific and location-dependent. It refers to the actual operational behavior of the entire installed system at its point of interconnection. Different countries and even individual utilities have their own unique grid codes, such as California's Rule 21 or Germany (VDE-AR-N 4105). Both codes adopt IEEE 1547 as a baseline but may include additional requirements or specific settings.</p> <p>9.(5)(ii): The Authority in consultation with licensees may publish from time to time a positive list of inverters that are available in Pakistan and are UL 1741 SB certified.</p> <p>9.(5)(iii): The Authority or its appointed entity shall keep on file the original UL 1741 Supplement SB certificate of inverters listed in the positive list.</p>

No	Regulation and Potential Issues	Rationale and Recommendations
7	<p>12.(3) In case of non-availability of meter(s) with licensee, the prosumer may procure such meter(s) directly subject to testing by licensee, before installation.</p> <p>Potential Issue 1</p> <p>12.(3) It sounds strange that a prosumer is asked to search the internet or local shops to procure a meter for a licensee and brings this meter to the licensee for testing and installation. ?</p> <p>13. (1) The equipment installed for metering shall be capable of accurately measuring the flow of electricity in two directions:</p> <p>Provided that in case two separate meters are installed, the energy metering calculation shall yield the same result as when a single meter is used.</p> <p>Potential Issue 2</p> <p>This is a general statement with no reference of the meaning of "accuracy". The testing requirement of "yielding the same result" is not achievable.</p>	<p>Recommendation</p> <p>Repeal 12.(3)</p> <p>Replace by</p> <p>12.(3): In case of non-availability of meter(s) with licensee, the licensee is required to procure, test, calibrate and install a meter of similar technical specifications and accuracy within 5 working days and replace that meter within 30 days with a meter from its positive list of meters.</p> <p>Repeal 13. (1) with no replacement.</p>

No	Regulation and Potential Issues	Rationale and Recommendations
8	<p data-bbox="268 1310 330 1993">5. General powers, rights and obligations of the licensee.</p> <p data-bbox="373 1310 545 1993">Potential Issue 1 Regulation 5 does not mention the obligation of a licensee to provide information about progress and impact of the net-billing regulation implementation. This information is also needed under Table 17</p>	<p data-bbox="268 208 330 1310">Recommendation Add sub-Regulation 5(4): Reporting Obligation of the licensee</p> <p data-bbox="373 208 660 1310">(a) to maintain and update from time to time a positive list of makes and technology of sanctioned 2-channel bi-directional electronic meters capable of registering the flow of exported and imported electricity at any instance of time in all four quadrants of the power plane; (b) to maintain and update from time to time a positive list of makes and technologies of sanctioned inverters. (c) to maintain records and report, no later than the end of the month, to the Authority the following information for the preceding month,</p> <ul data-bbox="696 208 942 1310" style="list-style-type: none"> (i) Total number of distributed generation facilities connected to its network; (ii) Type and rated kW capacity of inverters installed in the preceding month; (iii) kWp of distributed generation facilities commissioned in the preceding month; (iv) Rated kWh of electricity storage, and other loads installed in the preceding month; (v) kWh imported and kWh exported as registered by the revenue meter; (vi) wav monthly kWh import cost in Rs/kWh of its non-Prosumers; (vii) wav monthly kWh import costs in Rs/kWh of its Prosumers. <p data-bbox="978 208 1150 1310">Rationale The above information is critical for a regulator to judge progress and impact of highly distributed electric power generation capacity addition under the net-billing prosumer regulation and make informed decisions based on its further analysis of the raw data provided by licensees.</p>

No	Regulation and Potential Issues	Rationale and Recommendations
9	<p>13. (3) The meter reading shall be carried out preferably through handheld units (HHU) and through automated means as directed by the Authority from time to time.</p> <p>Potential Issue Considering the still small percentage numbers of prosumers the regulation should use the group of prosumers to introduce and test State-of-the-Art bi-directional electronic meters and integrated communication protocols to record and transmit kWh imported and kWh exported data</p>	<p>Recommendation Repeal 13. (3) Replace by 13.(3) The meter reading shall be based on sanctioned 2-channel bi-directional electronic meters with integrated communication protocols to record and transmit kWh imported and kWh exported information . Meter readings through handheld units (HHU) shall be justified and approved by the Authority and replaced by automated data transmission based on the communication protocols of 2-channel bi-directional electronic meters at the latest at the end of 2027.</p>

No	Regulation and Potential Issues	Rationale and Recommendations
10	<p>14 (2) In case the billed amount of the kWh supplied by prosumer exceeds the billed amount of kWh supplied by licensee, the net billed amount shall be credited against prosumer's next billing cycle or shall be paid by the licensee to the prosumer quarterly.</p> <p>Potential Issue 1 Before this Regulation is promulgated it is recommended to appraise the financial impact of 14(1) and 14(2) on prosumers and the much larger group of consumers that are not investing in a distributed generation facility for whatever reason. The capabilities of hybrid inverters in combination with smart advisors to maximize cost-effectiveness has been a serious issue under netting-energy regulations not only in Pakistan. Under net-billing the opportunities for licensees to procure least cost power from a prosumer are much better if export prices are set as in (Table-1) https://www.youtube.com/watch?v=zP4PeezwZlc</p>	<p>Recommendation It is recommended to prepare an Excel-based Virtual Billing Computer (VBC) concerning the issue. The VBC translates and visualizes the provisions of Regulation 14 into equations and functions over the commercial life of a distributed generation facility. The basic shortcomings of net-metering, whether it is netting-energy in kWh or netting-energy cost are the same. Some prosumers and advisors will try to configure the kWp capacity of a solar photovoltaic power plant (SPV) and the percent self-consumption and kWh battery storage + creating additional loads in such a way that the monthly bill will be close to Zero, i.e. to maximize the cost-effectiveness of the SPV.</p> <p>Of interest for a prosumer and advisors is to iterate through the kWp size of a SPV and test inverter settings to satisfy the equation below. In other words, the monthly electricity bill is ZERO</p> <p>To what extent this is possible and how close to ZERO can we get, apply the equation below.</p> $\frac{kWh(Exp)}{kWh(Imp)} = \frac{Price(Imp)}{Price(Exp)}$ <p>Whether the result is a cost-effective investment is a different story and calculation. Nevertheless, prosumers know technical opportunities to ensure that the monthly electricity bill hovers around Zero.</p>

No	Regulation and Potential Issues	Rationale and Recommendations
11	<p data-bbox="286 1279 381 1989">Schedule-I. [See Regulation 2 (1) (b)] Distributed Generation Interconnection Agreement (1 KW to 1MW)</p> <p data-bbox="428 1787 454 1989">Potential Issue 1</p> <p data-bbox="498 1279 561 1989">1. The power unit KW does not exist in the SI-System or its derived units.</p> <p data-bbox="608 1279 773 1989">Schedule-I (3) The interconnection disconnect switch shall be rated for the voltage and fault current requirements of the DG Facility, and shall meet all applicable IEC, IEEE Standards, as well as applicable requirements of the Grid Code.</p> <p data-bbox="820 1787 846 1989">Potential Issue 2</p> <p data-bbox="854 1279 953 1989">".....and shall meet all applicable IEC, IEEE Standards, as well as applicable requirements of the Grid Code" is a legally void and non-enforceable requirement.</p>	<p data-bbox="286 1032 313 1256">Recommendation</p> <p data-bbox="321 230 357 1256">Change KW to kW because 1 kWh/h= 1 kW and define 1 kW= 1kWh/h in Regulation 2</p>

No	Regulation and Potential Issues	Rationale and Recommendations
12	<p>Schedule – II [See Regulation 3 (1)] Standard Application Form for Licensee</p> <p>2. Location of Generation System</p> <p>Latitude – Longitude (i.e. 49o 32'06" N—91o 64'18" – optional)</p>	<p>Recommendation</p> <p>Delete "optional" and make it mandatory</p> <p>Rationale</p> <p>The Latitude and Longitude information of the distributed generated facility is required to prognose the output of the facility if this facility is a solar photovoltaic (SPV) power plant. The cellular phone of an applicant and a suitable App from the internet will provide this information free of charge</p>

No	Regulation and Potential Issues	Rationale and Recommendations
13	<p data-bbox="228 1310 294 1971">Schedule – II [See Regulation 3 (1)] Standard Application Form for Licensee</p> <p data-bbox="299 1400 365 1971">5. Primary Intent of the Generation System -On Site Use of power or Distributed Generation</p> <p data-bbox="404 1769 435 1971">Potential Issue 1</p> <p data-bbox="440 1310 540 1971">Primary intent is too vaguely classified. See table 18 for a classification of power plants that are either netting energy or netting energy cost.</p> <p data-bbox="545 1444 577 1971">6. Electricity Use, Production and Purchases</p> <p data-bbox="581 1310 647 1971">(a) Anticipated annual electricity consumption of the facility or site (kWh)/yr.</p> <p data-bbox="686 1769 718 1971">Potential Issue 2</p> <p data-bbox="722 1310 823 1971">The licensee should know that anyway based on monthly bills issued to this applicant for the last few years.</p> <p data-bbox="827 1310 893 1971">(b) Anticipated annual electricity production of the generation system: (kWh)/yr.</p> <p data-bbox="932 1769 964 1971">Potential Issue 3</p> <p data-bbox="969 1310 1034 1971">An applicant is only able to complete this part if it follows the Table 3 strategy</p> <p data-bbox="1039 1310 1105 1971">c) Anticipated annual electricity purchases (i.e. (a) minus (b)) (kWh)/yr.</p> <p data-bbox="1114 1769 1146 1971">Potential Issue 4</p> <p data-bbox="1150 1310 1288 1971">This calculation ignores scenarios that the time-of-day load of the prosumer may be different from the time of -day output of the SPV or even mutually exclusive. Refer to example under 6(c) Rationale</p>	<p data-bbox="228 1064 260 1288">Recommendation</p> <p data-bbox="264 683 296 1288">Repeal 5. Primary Intent of the Generation System</p> <p data-bbox="301 1153 332 1288">Replace by</p> <p data-bbox="337 212 402 1288">5. Estimated percentage of self-consumption of the annual output of the distributed generation facility by the prosumer.</p> <p data-bbox="442 1164 473 1288">Rationale</p> <p data-bbox="478 212 685 1288">100% self-consumption implies that SPV works like a captive power plant with 0 kWh exported at any instance of time. 0% self-consumption implies that the distributed generation facility is exporting any kWh generated at any instance of time. Both modes of operation are possible but defy a common understanding of a netting-energy or netting energy cost power plant. Most distributed generation facilities operate at between 15% and 70% self-consumption.</p> <p data-bbox="724 1142 755 1288">Repeal 6.(a)</p> <p data-bbox="760 212 826 1288">Replace 6(a) by : Average annual electricity consumption of the applicant for the last 3 years = (kWh)/yr.</p> <p data-bbox="865 918 896 1288">Repeal 6(c) and do not replace</p> <p data-bbox="936 1164 967 1288">Rationale</p> <p data-bbox="972 212 1147 1288">Take a business that consumes annually 5,000 kWh electricity only between sunset and sunrise. In addition, the business operates an SPV without storage with an annual output of 4,000 kWh. Consequently, the applicant exports 4,000 kWh to the licensee and imports 5,000 kWh from the licensee. Based on 6(c) calculation the business imports only 1,000 kWh.</p>

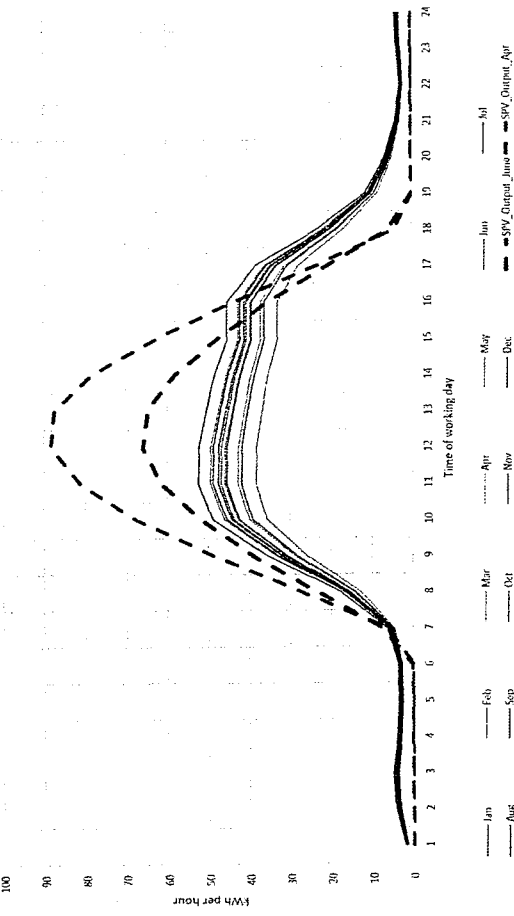
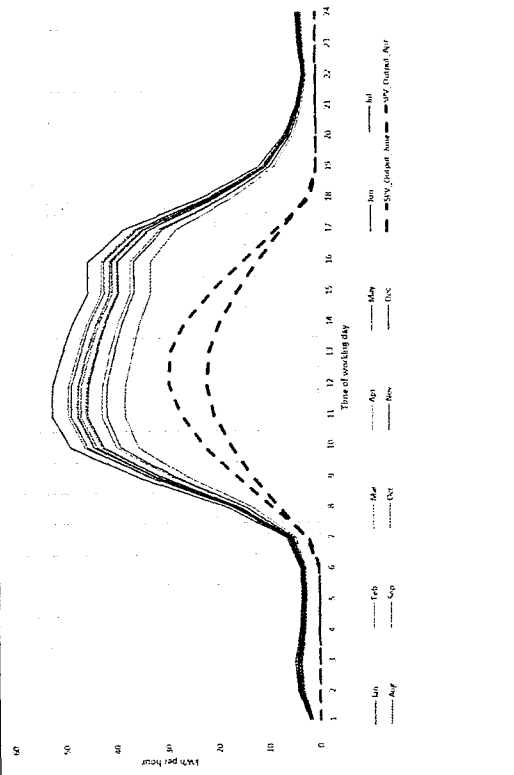
No	Regulation and Potential Issues	Rationale and Recommendations
14	<p>Schedule III [See Regulation 4(2)] APPLICATION FOR ACCORD OF CONCURRENCE NATIONAL ELECTRIC POWER REGULATORY AUTHORITY</p> <p>2. Location of DG Facility</p> <p>4. Size of proposed DG Facility</p> <p>Potential Issue 1: Unit missing</p> <p>5. Approximate monthly energy proposed to be supplied to Licensee (kWh): Potential Issue 2: An applicant cannot provide this information. The licensee should perform this task against a fee.</p>	<p>Recommendation</p> <ol style="list-style-type: none"> 1. This schedule may provide at the bottom a few instructions for an applicant on how to complete the table 2. Location of DG Facility: Latitude – Longitude (i.e. 49o 32'06" N—91o 64'18" 4. Size of proposed DG Facility in kWp 5. Weighted average monthly minimum kWh and maximum kWh supplied to Licensee <p>Rationale No. 5 requires applying replaced 3.(3)</p>

15	Paradigm Shift Regulation as proposed by NEPRA	Description of operation and relevant legal steps
	The following not yet included innovative forward-looking Regulations had been proposed by NEPRA or discussed with NEPRA. Each proposed Paradigm Shift Regulation requires its own legal and technical guidelines or regulations.	
	15.1 Community of consumers as a net-billing legal person	<ul style="list-style-type: none"> (1) Community of consumers of the same licensee invest, own and operate a SPV. (2) Authority grants permission to export up to 100% of the SPV output to the licensee (3) Community and licensee sign an Interconnection Agreement (4) Authority approves the Interconnection Agreement. (5) The SPV must be at a location the Community owns and controls.
	15.2 Licensee as a virtual net-billing legal person	<ul style="list-style-type: none"> (1) Licensee is granted permission to invest, own, and operate a SPV fully or partially financed by a community of consumers connected to its network. (2) Licensee is granted permission to sell up to 100% of the SPV output under CTBCM.
	15.3 Prosumer as a net-billing aggregator	<ul style="list-style-type: none"> (1) Prosumer with several revenue meters installed at different buildings on its premises is granted permission to aggregate the kWh exported and kWh imported (2) Any building installed on prosumer's premises may consume up to 100% of the output of any SPV installed on the Prosumer premises. (3) Aggregated import kWh and aggregated export kWh are applied for net-billing
	15.4. Virtual Power Plant (VPP) as a legal person and trader under CTBCM	<ul style="list-style-type: none"> (1) VPP is granted permission to interconnect SPVs (2) Maximum aggregated design capacity of all SPVs \leq xx MWp (3) VPP shall be licensed as an IPP to dispatch power under its central dispatch system and to provide services such as power trading, balancing energy and power scheduling under CTBCM. (4) VPP shall contribute to a more cost-competitive procurement of balancing power
	15.5. Trader of prosumers SPVs aggregated output	<ul style="list-style-type: none"> (1) A licensed and registered trader under CTBCM is granted permission to procure up to 100% of the aggregated output of a Community that are all prosumers that own or operate a SPV and prefer to sell up to 100% of the SPV output under CTBCM (2) The trader shall charge the prosumer a commissioning fee set and adjusted from time to time by the Authority. (3) The terms and conditions of the Power Purchasing Agreement signed between the Trader and the prosumer are subject to approval by the Authority (4) The prosumer shall pay for the costs and installation of its revenue meter (5) The revenue meter shall be from the positive list of the Authority or Licensee

No	Regulation and Potential Issues	Rationale and Recommendations
16	<p data-bbox="271 1585 299 1984">16. Power to require information</p> <p data-bbox="341 1800 370 1984">Potential issue</p> <p data-bbox="377 1319 550 1984">NEPRA may already apply its power to require information and request licensees to provide all information available to them to enable NEPRA to publish an annual report of progress and impact of the prosumer net-billing regulation.</p> <p data-bbox="592 1319 801 1984">The shown example is based on the annually published 1 page summary in Germany. The form and manner of reporting may consider specific issues of public interest or requirements from higher authorities in Pakistan. The baseline for the statistic is the calendar year that follows the date of promulgation of this regulation.</p>	<p data-bbox="271 560 299 1301">Progress and Impact End of 2024</p> <ul data-bbox="307 309 620 1301" style="list-style-type: none"> - 4.75 million SPV installed of which 0.425 are smaller than 2 kWp ("balcony SPV"). - 99 million kWp SPV installed - 59.8 billion kWh exported by prosumers in 2024 - 12.4 billion kWh self—consumed by prosumers - 72.2 billion kWh generated by prosumers - 14.5% of all electricity generated is from SPV - 17.2 billion EURO invested in SPV in 2023 - Export tariff for <=10 kWp 8.05 EURO ct/kWh in 2024 - Average of 22.7 kWp installed by all registered prosumers <p data-bbox="663 640 691 1301">Some required information is discussed in Table No. 8</p>

Annex to Table 3

Visualization of the hourly calculated percent self-consumption of the output of a 50 kWp SPV (left) and 150 kWp(right) of the same building



The 12 parabolic shaped solid line curves represent the hourly wav kWh electricity consumption i.e. kWh/h = kW of an air-conditioned building in a hot or tropical climate. The two dashed lines represent the hourly kWh supply of **50 kWp** SPV for the months of April and June. The 12 monthly consumption completely engulfs the SPV output. The kWh exported meter shows 0 kWh exported

The 12 parabolic shaped solid line curves represent the hourly wav kWh electricity consumption i.e. kWh/h = kW of the same building. The two dashed lines represent the hourly kWh supply of a **150 kWp** SPV for the months of April and June. The SPV exports excess kWh in June and even more in April almost all day because the dashed red and black line engulf the building consumption

LAHORE ELECTRIC SUPPLY COMPANY

DIRECTORATE GENERAL MIRAD LESCO HQ

adjacent 132 kV Garden Town Grid Station, Ferozpur Road Lahore

Ph: 042-99232117

www.lesco.gov.pk

SUB: PUBLIC NOTICE FOR SEEKING COMMENTS IN THE MATTER OF DRAFT PROSUMER REGULATIONS

REF: Your good office letter no.DG(Lic)/NMR-01/07-59 dated 02.01.26

REGISTRAR OFFICE
Date: 12.1.26
Diary No: 660

Please find below the preliminary comments for kind consideration:-

Clause no.	Comments
2(e)	May add in the end "who own and operate the DG facility"
2(e)(i)(j)	Schedule I Recitals clause B mentions about "storage device" but here not mentioned in the definitions. May mention about storage system
3	A flow chart of whole connection process with timelines may be added
3(3)	May replace "load flow study" with "grid interconnection studies (load flow, short circuit, dynamic stability and harmonic analysis)"
	May also mention the names of standard softwares for performing these studies e.g. PSS, ETAP, CYME, Synergi, PSCAD
3(4)	May add that there shall not be any outstanding arrears or deferred amount against that premises / connection
3(5)	May mention that this 80% limit is also applicable in case of independent transformer OR otherwise?
3(5)	What about maximum limit of DG capacity allowed on 11 kV feeder?
3(6)	May mention here about requirement of Hosting Capacity Analysis
3(11)	May add in the beginning about testing of DG facility by the certified Installer in witness of representatives of Licensee
4(1)	May refer to decision of Federal Cabinet dated 31.08.21 regarding cessation of generation licence for DG facility upto 25 kW. Please refer to SRO 448(I)/2021 dated 09.11.21

Forwarded please:

☒ Sec. action

☒ For info (Lic)

☒ SA (M&E)

☒ DG (Tech)

☒ ADG (Trd)

☒ SLA

☒ Consult (Tech)

☒ For kind information, please.

1. Chairman

2. M (Tech)

3. M (Law)

☒ For info (Lic)

☒ DG (Admin/HR)

☒ DG (CAD)

☒ DG (ATC)

☒ DG (Fin)

☒ Dir. (LT)

☒ DG (Lic)

☒ For kind information, please.

1. Chairman

2. M (Tech)

3. M (Law)

4. M (Dev)

5(a)	May delete sub clause ii
5(d)	May mention the equation for validation check to apply in the billing system for export readings
7(2), 21(3)	May add that the prosumer shall apply for renewal 03 months before expiry of the term
	When a prosumer, with earlier approved DG capacity more than sanctioned load or say equal to 1.5 times of sanctioned load, will seek renewal, then DG capacity approved onwards will be equal to its sanctioned load only? Meaning if such prosumer is not willing to enhance his sanctioned load, then he has to remove any already installed DG capacity more than sanctioned load?
9(1)	May replace "grid code" with "Distribution Code"
	It is mentioned about "single line diagram as specified in Schedule-VII". But there is no Schedule-VI or Schedule-VII found in this draft
9(2)	May add about installing external Circuit Breakers, Surge Protection Devices
9(4)	What about applicants on 11 kV level?
9(5)	The mentioned standard IEC 61215 is for crystalline PV Modules. May add about IEC 61646 for thin film PV Modules. For PV Inverters, may mention IEC 62109, IEC 61727, IEC 61000
	May mention about role of PSQCA, Customs etc. in the enforcement of these equipment standards
	May mention about hybrid Inverter
	May add here another sub clause as under:- "There shall be separation / isolation of solar PV system bus bar from other generating sources (i.e. gas, diesel, coal, furnace oil, captive solar etc.); to avoid any illegal export of energy to Licensee network & safety hazards"
12(3)	May delete this, to avoid any complication
14(2)	May delete "or shall be paid by the licensee to the prosumer quarterly", to avoid any complication
16	May mention a reasonable time frame i.e. minimum one week
21	May clarify about the case of a prosumer who is with valid generation concurrence and apply for enhancement of its DG

	capacity, before the expiry. When the new DG Concurrence under these Prosumer Regulations will be issued, the term will start afresh with next 5 years term OR the previous term will continue till its original expiry?
	In the same case above, that prosumer will be billed according to national average power purchase price OR will be billed according to national average energy purchase price?
	May delete Explanation from here and instead insert the complete definition of Distributed Generator in the clause 2 "Definitions"
Schedule I Agreement	In para no.6, in the heading, may replace "commissioning testing" with "testing and commissioning of connection"
	In para no.8 "Temporary Disconnection of a DG Facility", may delete "upon the provision of 30 days written notice"
	In para no.8 "Temporary Disconnection of a DG Facility" may add about system constraints
	In para no.10 "Term and Termination of Agreement", may delete "upon the provision of 30 days written notice"
Schedule IV	May mention about the evidence of deposit / type of acceptable banking instruments (e.g. pay order, CDR, online deposit receipt etc.) as per requirement of NEPRA
	May mention that charging of NEPRA fee should be for applied DG capacity > 25 kW only
	At present, there is no provision of charging of DG application fee by DISCOs from applicants. Whereas, considerable human resources, man hours and other office resources are being used of DISCO, in HQ as well as field formations, from application up to billing stages. Therefore, a DG application fee by DISCOs @Rs.1,000/- per kW applied DG capacity against all prosumers may also be allowed
General	
(i) Except Schedule II(14), role of the Installer certified by PPIB is missing here	
(ii) It is proposed to introduce separate tariff sub categories for prosumers with higher fixed charges.	
Increasing penetration of distributed generation has huge financial implication to DISCOs. It is highlighted here about capacity obligations of DISCOs. Capacity charges component of tariff charged to DISCOs is much higher than fixed charges component of tariff charged to consumers.	

(iii) Prosumers of all allowed tariff categories should be bound to maintain power factor 0.95. Otherwise low power factor penalty should be charged in their electricity bills

(iv) Use of single phase inverters shall be prohibited

(v) Will previous instructions / clarifications issued time to time by NEPRA on net metering, other than amendments in Regulations, also stand repealed? e.g. NEPRA letter no.DG(CAD)/TSD-10/4174-83 dated 19.03.25 etc.

(vi) May add Single line diagram / Connection schemes


Director General (MIRAD)
LESCO

To:

Registrar,
NEPRA,
Attaturk Avenue (East), G-5/1, Islamabad

Info:

1. S.O to C.E.O LESCO
2. Master file

No. 107-68 /MRD/CMRA

Dated 08/01/2026

FORMAL STAKEHOLDER REPRESENTATION ON THE DRAFT NEPRA (PROSUMER) REGULATIONS, 2025

Submitted to

The Registrar

National Electric Power Regulatory Authority (NEPRA)

Islamabad, Pakistan

Submitted by

Pakistan Solar Association (PSA)

National Representative Body of Pakistan's Solar & Distributed Energy Industry

Forwarded please:

☒ For new action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (T&I)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (E.T.)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EPCOM)

For kind information, please:

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

12-01-26

REGISTRAR OFFICE
Diary No. 656
Date: 12.1.26



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To: The Registrar, National Electric Power Regulatory Authority (NEPRA)
Date: December 27, 2025
Subject: Formal Representation and Stakeholder Comments on the Draft
NEPRA (Prosumer) Regulations, 2025

Respected Sir / Madam,

The Pakistan Solar Association (PSA) respectfully submits this formal stakeholder representation on the Draft NEPRA (Prosumer) Regulations, 2025 for the consideration of the Authority. This submission is presented with the objective of highlighting practical, technical, and economic implications of the proposed regulatory changes, and to ensure that necessary measures for grid management do not unintentionally undermine the viability of distributed solar generation that has emerged as a critical relief mechanism for Pakistan's power sector.

PSA recognizes NEPRA's responsibility to address evolving grid dynamics and financial pressures within the distribution system. However, as demonstrated in this document, several provisions of the Draft Regulations—particularly those related to system sizing, export compensation, contract duration, and administrative processes—risk reversing the progress achieved over the past decade. These measures disproportionately impact residential and SME prosumers, restrict future electrification needs such as electric vehicles, and weaken investor confidence at a time when private capital is actively offsetting public-sector constraints. This representation is therefore submitted in a constructive spirit, with data-backed recommendations aimed at preserving grid stability while ensuring that distributed solar remains an affordable, scalable, and nationally beneficial solution.

1. EXECUTIVE SUMMARY

The Pakistan Solar Association (PSA) submits this response to the NEPRA (Prosumer) Regulations, 2025 with the objective of safeguarding grid stability while preserving the financial viability of distributed solar generation in Pakistan. PSA fully recognizes NEPRA's mandate to manage technical risks; however, the proposed framework introduces abrupt economic disincentives, rigid capacity constraints, shortened contract tenures, and prolonged approval timelines that collectively threaten to stall one of Pakistan's most successful energy transitions. Statistical evidence from 2025 shows that rooftop solar contributes only 2.9% of total national generation, while delivering disproportionate benefits such as reduced peak demand, avoided fuel imports, and lower transmission and distribution losses (currently 16–18%). Despite this, the regulations devalue surplus solar energy by nearly 60%, restrict system sizing to outdated sanctioned loads, and impose transformer caps that ignore modern smart-inverter capabilities and consumer-led investment in battery storage.

International experience clearly demonstrates that such abrupt policy tightening leads to market contraction, job losses, and loss of investor confidence. Examples from Vietnam, California, and the UK show that aggressive cuts to export compensation and regulatory uncertainty can collapse rooftop solar markets within months, while countries like Germany, Australia, the Netherlands, and Thailand have achieved high solar penetration through long-term policy certainty, flexible system sizing, smart-grid integration, and streamlined digital approvals. PSA therefore urges NEPRA to recalibrate the 2025 regulations by restoring contract stability, adopting hosting-capacity-based grid management, ensuring fair compensation for exported energy, and modernizing approval processes. These measures will protect the grid, prevent a utility "death spiral," and ensure that solar remains an affordable and scalable solution for Pakistan's middle class, SMEs, and emerging EV ecosystem—aligning fully with national energy security goals and Vision 2030.

2. INTRODUCTION: THE PAKISTAN SOLAR ASSOCIATION (PSA)

2.1 Who We Are

The **Pakistan Solar Association (PSA)** is the premier representative body for the solar energy sector in Pakistan, comprising over 800 member companies, including Tier-1 manufacturers, Engineering, Procurement, and Construction (EPC) firms, and renewable energy consultants. Since its inception, PSA has served as the critical bridge between the private sector and regulatory authorities, ensuring that Pakistan's transition to clean energy is technically sound, economically viable, and socially inclusive.

2.2 Our Role in the Solar Industry and Clean Energy

The PSA plays a pivotal role in shaping Pakistan's energy landscape by:

- ✓ **Driving VRE Adoption:** We are the primary catalysts for the deployment of Distributed Generation, having facilitated the installation of solar capacity, which significantly reduces the burden on the national grid.
- ✓ **Job Creation & Economic Growth:** The solar industry, under the umbrella of PSA, has created over **50,000 direct and indirect jobs**, fostering a new generation of skilled engineers and technicians.
- ✓ **Climate Leadership:** We are committed to the **United Nations Sustainable Development Goals (SDG 7)** and Pakistan's **Vision 2030**, which targets 30% of the energy mix from Renewable Energy (VRE). PSA members provide the technology and capital that allow the state to mitigate carbon emissions without utilizing public debt.

2.3 Purpose of this Document

This formal submission is presented by the PSA to provide a comprehensive technical and economic critique of the **Draft NEPRA (Distributed Generation and Net Metering) Regulations, 2025**.

While the PSA acknowledges the need for grid stability and evolution, we believe that several clauses in the proposed regulations—specifically regarding **Net Billing rates, capacity caps, and contract tenures**—pose a significant threat to the survival of the solar industry and the financial security of thousands of prosumers.

The comments and recommendations contained herein are backed by **2025 global statistical benchmarks** and are intended to offer a "win-win" path: protecting the national grid while ensuring that "Green Pakistan" remains an affordable reality for the middle class, the SME sector, and the emerging Electric Vehicle (EV) market.

Strategic Note:

This introduction positions the PSA not as an "opposition" group, but as a **stakeholder** that is helping the government achieve its own goals. It emphasizes that PSA members are doing the government's job (funding clean energy) so that NEPRA should listen to them to avoid "stalling" the progress made so far.

3. DETAILED COMMENTS ON SPECIFIC REGULATIONS

I. System Sizing, Operational Constraints, and the EV Transition

Regulation Referenced: *"The capacity of a proposed distributed generation facility shall not exceed the sanctioned load of the applicant's premises:" (p. 2)*

- **PSA Comment:**
 - ♦ **Technical Efficiency:** Limiting capacity to the "sanctioned load" ignores the DC-to-AC ratio (over-provisioning) required for optimal inverter performance. c. Considering these inefficiencies, it is not possible for a household to be self-sufficient in terms of electricity generation.
 - ♦ **Electric Vehicle (EV) Integration:** As of 2025, Pakistan is seeing a rapid shift toward Electric Vehicles (EV cars and motorbikes). A standard EV car charger requires 7kW to 22kW of power. By capping solar capacity at the existing sanctioned load, NEPRA is effectively forcing prosumers to charge their "green" vehicles using expensive, carbon-heavy grid power at night, rather than harvesting excess solar during the day for later use.
 - ♦ In California (USA) under NEM 3.0, prosumers are explicitly permitted to size systems based on *future* expected loads, such as the purchase of an EV or a heat pump, rather than being restricted to historical sanctioned loads. Likewise, the UK's G98/G99 regulations have been updated to accommodate "Smart Export Guarantee" (SEG) schemes that incentivize oversized solar arrays to ensure that home-based EV charging hubs do not strain the local distribution network during peak evening hours.
- **Recommendation:**
 1. **Proactive Sizing:** PSA proposes a sizing limit of 1.5x the sanctioned load or a provision to increase capacity based on proof of EV ownership (e.g., vehicle registration).
 2. **Future-Proofing:** Allow an automatic 30-50% "Growth Buffer" above the sanctioned load to accommodate the transition to electric mobility and the electrification of heating/cooling, aligning with Pakistan's National Electric Vehicle Policy (NEVP) goals for 2025-2030.

II. Local Grid Hosting Capacity & Technical Barriers

Regulation Referenced: *Regulation 3, Sub-regulation (5), Second Proviso: "Provided further that the licensee shall not entertain any application if the distributed generation capacity connected to a particular distribution transformer has reached 80% of its rated capacity." (p. 2)*

PSA Comment:

- ♦ **Creation of "Solar Monopolies":** This regulation creates an unfair "first-mover advantage." In a typical residential block, the first few houses to install solar will exhaust the 80% limit. This leaves remaining neighbors—who may also wish to reduce their bills or charge EVs—legally barred from going solar, regardless of their willingness to pay. This creates social inequity and halts the "Green Neighborhood" movement.

- **Misunderstanding of Transformer Stress:** The 80% cap assumes that solar generation *adds* a burden to the transformer. In reality, during peak sunlight hours (when industrial and AC loads are highest), distributed solar meets the load locally. This reduces the current flowing through the transformer from the high-voltage grid, effectively cooling the transformer and extending its life.
- **Revenue Loss for DISCOs:** By capping solar at 80%, DISCOs are intentionally limiting the amount of cheap, locally generated energy available to them to offset their own distribution losses (T&D losses).
- **Technological Obsolescence:** A fixed 80% cap is a "static" solution. Modern power electronics allow for "dynamic" management. In 2025, rather than blocking new users, DISCOs should use the one-time fees they collect to install basic monitoring on transformers to manage actual real-time flow rather than theoretical limits.

Supporting Examples:

- **Australia (South Australia Case Study):** South Australia frequently reaches 100% of its demand met by rooftop solar. They moved away from static caps years ago. By implementing Dynamic Operating Envelopes (DOEs), the grid communicates with smart inverters to slightly dial back export only during the rare minutes when the transformer is actually at risk, rather than banning solar connections entirely.
- **IEEE 1547-2018 Standards:** This global standard for Interconnecting Distributed Resources allows inverters to provide Volt-VAR support, which automatically stabilizes local grid voltage without requiring the DISCO to intervene or cap capacity.

Recommendation:

1. **Shift to 100% Hosting Capacity:** Increase the limit to 100% of the transformer's rated capacity, as the simultaneous peak generation of all solar systems rarely coincides with zero local demand.
2. **Smart Inverter Mandate:** Instead of a cap, NEPRA should mandate that all new grid-tied inverters must be "Smart Inverters" capable of remote curtailment or automated voltage regulation.
3. **Upgrade Fund:** Propose that the Rs. 1000/kW fee collected by NEPRA/DISCOs be ring-fenced into a "Grid Modernization Fund" specifically used to upgrade transformers that reach 90% capacity, ensuring no citizen is denied the right to generate clean energy.

III. Financial Viability & Net Billing Transition

Regulation Referenced: Regulation 14, Sub-regulation (1) Explanation:

"Explanation: 'net billing arrangement' means an arrangement under which electricity generated by distributed generation facility of prosumer is purchased by the licensee and the licensee raises the bill on the prosumer for his consumption at the applicable tariff, after giving credit for electricity supplied by prosumer to the licensee at the national average energy purchase price." (p. 6)

PSA Comment:

- ♦ **Economic Unviability (The "Savings Gap"):** Under the current 2024/2025 retail tariff, a prosumer buys electricity at an average of Rs. 50-60/kWh (including taxes/surcharges). By offering only Rs. 11.30/kWh for exports, NEPRA is creating a 400-500% price disparity. This means a prosumer must export 5 units to the grid just to "offset" the cost of 1 unit they consume at night. This math makes solar an "expense" rather than an "investment."
- ♦ **Middle-Class Exclusion:** The 1.5 to 2-year payback was the primary driver for middle-income households to adopt solar as a hedge against inflation. A 4 to 7-year payback period, combined with high interest rates in 2025, makes solar financing nearly impossible. This regulation effectively reserves solar only for the ultra-wealthy, leaving the struggling middle class tied to high DISCO bills.
- ♦ **Risk of Grid Defection (The "Death Spiral"):** When the "Buy-Back" rate is too low, prosumers stop exporting. Instead, they invest in Hybrid/Off-Grid Battery Storage (BESS). In 2025, as battery prices drop, consumers will choose to disconnect from the grid entirely. This leaves the DISCOs with even fewer paying customers, forcing them to raise rates further for the poor—a phenomenon known globally as the "Utility Death Spiral."
- ♦ **Misalignment with NAPP Logic:** The NAPP is calculated based on massive IPPs (Coal, Gas, Nuclear) that received government guarantees, land, and infrastructure. Prosumers provide "distributed energy" at zero cost to the government—no fuel, no sovereign guarantees, and no transmission losses. Paying them the same "base price" as a massive coal plant is technically and economically unfair.

Supporting Example:

- ♦ **The Vietnam Crisis (2021-2023):** Vietnam's solar market was the fastest-growing in Southeast Asia until the government slashed export rates. The result was a **market crash** in the rooftop segment, leading to the bankruptcy of specialized solar firms and a massive loss of investor confidence in the country's energy sector.
- ♦ **California NEM 3.0 (2023-2025):** When California transitioned to lower net-billing rates, the industry saw a 70-80% drop in new applications initially. However, the market only survived because they offered "Transition Credits" to bridge the gap—a mechanism currently missing in NEPRA's 2025 draft.

Recommendation:

1. **Introduce a "Solar Export Floor Price":** Instead of NAPP, the export rate should be pegged to the Average Variable Cost of Generation plus a "Green Premium" (approx. Rs. 25–30/kWh) to reflect the avoided T&D losses.
2. **Implementation of "Grandfathering":** Explicitly state that all systems commissioned before 2025 will retain their original 1:1 net metering rates for the remainder of their 10-year agreements.
3. **Tiered Buy-Back:** Offer a higher buy-back rate for small residential systems (under 25kW) to protect low-to-middle income households.

IV. Contract Stability & Investor Confidence

Regulation Referenced: *Regulation 7, Sub-regulation (1): "The term of the agreement between prosumer and licensee shall be five years with effect from date of commissioning of distributed generation facility." (p. 4)*

Expanded PSA Comment:

- **Mismatch with Payback Periods:** Under the new "Net Billing" (NAPP) rates proposed in Regulation 14, the payback period for a residential or commercial solar system will likely exceed 7 years. By setting the contract term at only 5 years, NEPRA is creating a scenario where the legal agreement expires *before* the consumer has even recovered their initial investment. This makes solar a high-risk financial "gamble" rather than a secure investment.
- **Asset Life vs. Contract Life:** Tier-1 solar modules are engineered for a 25-to-30-year operational life. A 5-year contract covers only 20% of the system's useful life. This disparity creates "Regulatory Cliff" anxiety—prosumers fear that after 5 years, DISCOs may refuse to renew the contract or impose even harsher terms, rendering the hardware useless.
- **Deterrence of Financing:** Most green financing schemes from commercial banks (under State Bank of Pakistan's previous or future iterations) require a stable regulatory horizon. A 5-year term is too short for banks to offer long-term, low-interest loans, effectively killing the Solar Financing market for the middle class.
- **Erosion of "Grandfathering" Rights:** The reduction from 7 years to 5 years signals to the market that NEPRA can change the rules of the game at any time. This "Regulatory Uncertainty" is the single biggest deterrent to Foreign Direct Investment (FDI) in Pakistan's energy sector.

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1. **Reinstate the 7-Year Term (Minimum):** PSA strongly urges NEPRA to maintain the existing **7-year term** as the absolute minimum.
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Regulation Referenced: *Regulation 12 & Application Timeline (pp. 2-3).*

The initial process, from the time an application is first submitted to the licensee until the system is commissioned and concurrence is granted, involves a series of steps with specific deadlines and the maximum working days would be **81 that is around 4 months** (pp. 2-3):

Step	Responsible Party	Timeframe	Relevant Regulation
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Install & Commission Interconnection Facility	Licensee	15 working days	Reg 3(11)
Prosumer Notify Licensee of DG completion	Prosumer	At least 15 working days before interconnection	Agreement Point 6
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- **The Digital Disconnect (81-Day Timeline):** In 2025, where consumer services are moving toward instantaneous fulfillment, a 4-month (81 working days) approval window is a deterrent to adoption. This timeline represents "dead capital," where a consumer has paid for equipment that sits idle, losing 25% of a year's generation while waiting for paperwork.
- **Regulatory Overreach (Systems <25kW):** By pulling the approval of small residential systems (under 25kW) away from DISCOs and back to NEPRA (Regulation 4), the Authority is creating a massive administrative bottleneck. NEPRA, as a federal regulator, is not equipped to process thousands of individual residential applications monthly. This centralization serves no technical purpose but adds weeks of "transit time" for documents between the DISCO and NEPRA.
- **The "Entry Tax" (Rs. 1,000/kW):** Charging a fee of Rs. 1,000 per kW (Schedule-IV) creates a significant upfront cost. For a 10kW residential system, this is an additional Rs. 10,000 for a "concurrence" that is essentially a rubber-stamp exercise. When added to the cost of the green meter, the earthing, and the technical study, the "soft costs" of solar in Pakistan are becoming some of the highest in the region.
- **Lack of Transparency:** Without an online tracking system, prosumers are left at the mercy of lower-level DISCO staff. This manual "file-moving" system is the primary driver of petty corruption and "facilitation payments" required to get a net meter installed.

Statistical Data/Global Example:

- **United States (SolarAPP+):** The U.S. Department of Energy launched SolarAPP+, an automated permitting portal. In jurisdictions using this, the "Time to Permit" for residential solar was reduced from 20 days to zero (instant approval).
- **India (National Portal for Rooftop Solar):** In 2025, India's PM Surya Ghar Portal allows consumers to track their application from feasibility to subsidy release in real-time, significantly reducing the role of DISCO middlemen.

Recommendation:

1. **Restore Decentralization:** Empower DISCOs to grant final approval for all systems below 25kW without requiring NEPRA's concurrence. NEPRA should act as an auditor, not a processor, for small-scale residential solar.
2. **Implement a Unified Portal:** PSA recommends the launch of a National Prosumer Portal. Applications should be submitted digitally, and every step

(Technical Review, Payment, Inspection) must be timestamped and visible to the applicant.

3. **Automatic "Deemed Approval":** To enforce the 15-day technical review limit (Reg 3(6)), the regulation must state that if no objection is raised in writing within 15 days, the application is legally deemed approved, allowing the applicant to proceed with payment and installation.

4. **Exempt Small Systems from Fees:** Waive the Rs. 1,000/kW fee for systems under 25kW. The government should be subsidizing the *process* of going green, not taxing it.

4. SUMMARISE TABLE OF ISSUES IDENTIFIED & RECOMMENDATIONS

Regulation / Clause	Subject Matter	Issue Identified by PSA	PSA Recommendation
Regulation 3(2)	System sizing limited to sanctioned load	Sanctioned load is an outdated administrative value that ignores inverter efficiency losses, future electrification needs (EVs, heating/cooling), and real-world DC-AC ratios. Restriction prevents optimal system design and future-proofing.	Allow system sizing up to 1.5× sanctioned load , or permit additional capacity based on demonstrated future load (e.g., EV ownership). Introduce an automatic 30–50% growth buffer to support electrification.
Regulation 3(3)	Mandatory load flow study for ≥ 250 kW systems	Blanket requirement imposes high costs on SMEs, even where feeders have adequate hosting capacity, creating an unnecessary entry barrier.	Apply load flow studies only where DISCOs demonstrate feeder constraints . Introduce a risk-based or fast-track approval process for unconstrained feeders.
Regulation 3(5), Second Proviso	80% distribution transformer capacity cap	Static cap creates first-mover advantage, blocks otherwise viable connections, and ignores the fact that rooftop solar reduces transformer loading during peak demand hours.	Increase allowable limit to 100% of transformer capacity and replace static caps with dynamic hosting capacity management using smart inverters and monitoring.
Regulation 14(1) – Explanation	Net billing at National Average Energy Purchase Price (NAPP)	Export compensation reduced by ~60%, creating a 4–5× price disparity between import and export tariffs, making solar financially unattractive for middle-income consumers and SMEs.	Introduce a solar export floor price linked to avoided variable generation cost plus a green premium (approx. Rs. 25–30/kWh). Implement tiered buyback rates to protect small residential systems.
Regulation 7(1)	Contract duration reduced to 5 years	Five-year term is misaligned with system payback periods and asset life, increases regulatory uncertainty, and discourages	Reinstate minimum 7-year contract term , include automatic renewal clauses , and explicitly protect existing contracts from future tariff or billing

		financing and long-term investment.	changes (grandfathering).
Regulation 12(1)	Prosumer bears full interconnection costs	Full cost allocation ignores system-wide benefits of distributed solar and leads to double recovery through tariffs.	Adopt a shared-cost approach for interconnection assets that provide broader network benefits.
Regulation 12(2)	Prosumer bears cost of distribution system upgrades	Prosumers are charged for upgrades that often benefit future connections and overall grid performance.	Socialize network upgrade costs where benefits extend beyond the connecting prosumer, consistent with international practice.
Schedule IV (Reg. 4(2)(b))	Rs. 1,000/kW concurrence fee	Per-kW fee creates high upfront "entry tax," particularly burdensome for residential and SME systems.	Waive concurrence fee for systems below 25 kW and cap fees for larger systems. Ring-fence collected funds into a Grid Modernization Fund .
Regulations 3 & 4 (Application Process)	Centralized approval and extended timelines (up to 81 working days)	Lengthy, manual process delays commissioning, increases financing costs, and creates administrative bottlenecks and transparency concerns.	Restore DISCO-level approval for systems below 25 kW , implement a national digital prosumer portal , and introduce deemed approval if timelines are not met.

5. CONCLUSION

In light of the foregoing analysis, the Pakistan Solar Association respectfully urges NEPRA to reconsider and recalibrate the Draft Prosumer Regulations, 2025 to ensure that necessary grid management objectives are achieved without undermining the economic viability of distributed solar generation or eroding investor and consumer confidence. Solar prosumers are not a burden on the power system; rather, they are private citizens and businesses investing their own capital to reduce peak demand, lower system losses, and mitigate Pakistan's energy and foreign exchange challenges. A balanced, data-driven regulatory approach—grounded in technical realities and international best practice—will allow NEPRA to safeguard grid stability while preserving the progress made in clean energy adoption. PSA therefore requests that these concerns be given due consideration and that a public hearing be convened to allow stakeholders to present the supporting technical and economic evidence in detail.

Sincerely,

Mr. Waqas Moosa

Waqas
Chairman

Pakistan Solar Association (PSA)

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FORMAL STAKEHOLDER REPRESENTATION ON THE DRAFT NEPRA (PROSUMER) REGULATIONS, 2025

Addl. DG	Dir.	Addl. Dir.	DD-I
* AD-I*	RO	PS	E/S
CA-I	CA-II	CA-III	CA-III

Submitted to

The Registrar

National Electric Power Regulatory Authority (NEPRA)

Islamabad, Pakistan

Submitted by

Pakistan Solar Association (PSA)

National Representative Body of Pakistan's Solar & Distributed Energy Industry

Forwarded please:

☒ For recommendation ☐ For information

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1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

12.01.26

REGISTRAR OFFICE
Diary No. 656
Date: 12.1.26



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To: The Registrar, National Electric Power Regulatory Authority (NEPRA)
Date: December 27, 2025
Subject: Formal Representation and Stakeholder Comments on the Draft
NEPRA (Prosumer) Regulations, 2025

Respected Sir / Madam,

The Pakistan Solar Association (PSA) respectfully submits this formal stakeholder representation on the Draft NEPRA (Prosumer) Regulations, 2025 for the consideration of the Authority. This submission is presented with the objective of highlighting practical, technical, and economic implications of the proposed regulatory changes, and to ensure that necessary measures for grid management do not unintentionally undermine the viability of distributed solar generation that has emerged as a critical relief mechanism for Pakistan's power sector.

PSA recognizes NEPRA's responsibility to address evolving grid dynamics and financial pressures within the distribution system. However, as demonstrated in this document, several provisions of the Draft Regulations—particularly those related to system sizing, export compensation, contract duration, and administrative processes—risk reversing the progress achieved over the past decade. These measures disproportionately impact residential and SME prosumers, restrict future electrification needs such as electric vehicles, and weaken investor confidence at a time when private capital is actively offsetting public-sector constraints. This representation is therefore submitted in a constructive spirit, with data-backed recommendations aimed at preserving grid stability while ensuring that distributed solar remains an affordable, scalable, and nationally beneficial solution.

1. EXECUTIVE SUMMARY

The Pakistan Solar Association (PSA) submits this response to the NEPRA (Prosumer) Regulations, 2025 with the objective of safeguarding grid stability while preserving the financial viability of distributed solar generation in Pakistan. PSA fully recognizes NEPRA's mandate to manage technical risks; however, the proposed framework introduces abrupt economic disincentives, rigid capacity constraints, shortened contract tenures, and prolonged approval timelines that collectively threaten to stall one of Pakistan's most successful energy transitions. Statistical evidence from 2025 shows that rooftop solar contributes only 2.9% of total national generation, while delivering disproportionate benefits such as reduced peak demand, avoided fuel imports, and lower transmission and distribution losses (currently 16–18%). Despite this, the regulations devalue surplus solar energy by nearly 60%, restrict system sizing to outdated sanctioned loads, and impose transformer caps that ignore modern smart-inverter capabilities and consumer-led investment in battery storage.

International experience clearly demonstrates that such abrupt policy tightening leads to market contraction, job losses, and loss of investor confidence. Examples from Vietnam, California, and the UK show that aggressive cuts to export compensation and regulatory uncertainty can collapse rooftop solar markets within months, while countries like Germany, Australia, the Netherlands, and Thailand have achieved high solar penetration through long-term policy certainty, flexible system sizing, smart-grid integration, and streamlined digital approvals. PSA therefore urges NEPRA to recalibrate the 2025 regulations by restoring contract stability, adopting hosting-capacity-based grid management, ensuring fair compensation for exported energy, and modernizing approval processes. These measures will protect the grid, prevent a utility "death spiral," and ensure that solar remains an affordable and scalable solution for Pakistan's middle class, SMEs, and emerging EV ecosystem—aligning fully with national energy security goals and Vision 2030.

2. INTRODUCTION: THE PAKISTAN SOLAR ASSOCIATION (PSA)

2.1 Who We Are

The Pakistan Solar Association (PSA) is the premier representative body for the solar energy sector in Pakistan, comprising over 800 member companies, including Tier-1 manufacturers, Engineering, Procurement, and Construction (EPC) firms, and renewable energy consultants. Since its inception, PSA has served as the critical bridge between the private sector and regulatory authorities, ensuring that Pakistan's transition to clean energy is technically sound, economically viable, and socially inclusive.

2.2 Our Role in the Solar Industry and Clean Energy

The PSA plays a pivotal role in shaping Pakistan's energy landscape by:

- ✓ **Driving VRE Adoption:** We are the primary catalysts for the deployment of Distributed Generation, having facilitated the installation of solar capacity, which significantly reduces the burden on the national grid.
- ✓ **Job Creation & Economic Growth:** The solar industry, under the umbrella of PSA, has created over **50,000 direct and indirect jobs**, fostering a new generation of skilled engineers and technicians.
- ✓ **Climate Leadership:** We are committed to the **United Nations Sustainable Development Goals (SDG 7)** and Pakistan's **Vision 2030**, which targets 30% of the energy mix from Renewable Energy (VRE). PSA members provide the technology and capital that allow the state to mitigate carbon emissions without utilizing public debt.

2.3 Purpose of this Document

This formal submission is presented by the PSA to provide a comprehensive technical and economic critique of the **Draft NEPRA (Distributed Generation and Net Metering) Regulations, 2025**.

While the PSA acknowledges the need for grid stability and evolution, we believe that several clauses in the proposed regulations—specifically regarding **Net Billing rates, capacity caps, and contract tenures**—pose a significant threat to the survival of the solar industry and the financial security of thousands of prosumers.

The comments and recommendations contained herein are backed by **2025 global statistical benchmarks** and are intended to offer a "win-win" path: protecting the national grid while ensuring that "Green Pakistan" remains an affordable reality for the middle class, the SME sector, and the emerging Electric Vehicle (EV) market.

Strategic Note:

This introduction positions the PSA not as an "opposition" group, but as a **stakeholder** that is helping the government achieve its own goals. It emphasizes that PSA members are doing the government's job (funding clean energy) so that NEPRA should listen to them to avoid "stalling" the progress made so far.

3. DETAILED COMMENTS ON SPECIFIC REGULATIONS

I. System Sizing, Operational Constraints, and the EV Transition

Regulation Referenced: *"The capacity of a proposed distributed generation facility shall not exceed the sanctioned load of the applicant's premises:" (p. 2)*

• PSA Comment:

- **Technical Efficiency:** Limiting capacity to the "sanctioned load" ignores the DC-to-AC ratio (over-provisioning) required for optimal inverter performance. c. Considering these inefficiencies, it is not possible for a household to be self-sufficient in terms of electricity generation.
- **Electric Vehicle (EV) Integration:** As of 2025, Pakistan is seeing a rapid shift toward Electric Vehicles (EV cars and motorbikes). A standard EV car charger requires 7kW to 22kW of power. By capping solar capacity at the existing sanctioned load, NEPRA is effectively forcing prosumers to charge their "green" vehicles using expensive, carbon-heavy grid power at night, rather than harvesting excess solar during the day for later use.
- **In California (USA) under NEM 3.0,** prosumers are explicitly permitted to size systems based on *future* expected loads, such as the purchase of an EV or a heat pump, rather than being restricted to historical sanctioned loads. Likewise, the UK's G98/G99 regulations have been updated to accommodate "Smart Export Guarantee" (SEG) schemes that incentivize oversized solar arrays to ensure that home-based EV charging hubs do not strain the local distribution network during peak evening hours.

• Recommendation:

1. **Proactive Sizing:** PSA proposes a sizing limit of 1.5x the sanctioned load or a provision to increase capacity based on proof of EV ownership (e.g., vehicle registration).
2. **Future-Proofing:** Allow an automatic 30-50% "Growth Buffer" above the sanctioned load to accommodate the transition to electric mobility and the electrification of heating/cooling, aligning with Pakistan's National Electric Vehicle Policy (NEVP) goals for 2025-2030.

II. Local Grid Hosting Capacity & Technical Barriers

Regulation Referenced: *Regulation 3, Sub-regulation (5), Second Proviso: "Provided further that the licensee shall not entertain any application if the distributed generation capacity connected to a particular distribution transformer has reached 80% of its rated capacity." (p. 2)*

PSA Comment:

- **Creation of "Solar Monopolies":** This regulation creates an unfair "first-mover advantage." In a typical residential block, the first few houses to install solar will exhaust the 80% limit. This leaves remaining neighbors—who may also wish to reduce their bills or charge EVs—legally barred from going solar, regardless of their willingness to pay. This creates social inequity and halts the "Green Neighborhood" movement.

- **Misunderstanding of Transformer Stress:** The 80% cap assumes that solar generation *adds* a burden to the transformer. In reality, during peak sunlight hours (when industrial and AC loads are highest), distributed solar meets the load locally. This reduces the current flowing through the transformer from the high-voltage grid, effectively cooling the transformer and extending its life.
- **Revenue Loss for DISCOs:** By capping solar at 80%, DISCOs are intentionally limiting the amount of cheap, locally generated energy available to them to offset their own distribution losses (T&D losses).
- **Technological Obsolescence:** A fixed 80% cap is a "static" solution. Modern power electronics allow for "dynamic" management. In 2025, rather than blocking new users, DISCOs should use the one-time fees they collect to install basic monitoring on transformers to manage actual real-time flow rather than theoretical limits.

Supporting Examples:

- **Australia (South Australia Case Study):** South Australia frequently reaches 100% of its demand met by rooftop solar. They moved away from static caps years ago. By implementing Dynamic Operating Envelopes (DOEs), the grid communicates with smart inverters to slightly dial back export only during the rare minutes when the transformer is actually at risk, rather than banning solar connections entirely.
- **IEEE 1547-2018 Standards:** This global standard for Interconnecting Distributed Resources allows inverters to provide Volt-VAR support, which automatically stabilizes local grid voltage without requiring the DISCO to intervene or cap capacity.

Recommendation:

1. **Shift to 100% Hosting Capacity:** Increase the limit to 100% of the transformer's rated capacity, as the simultaneous peak generation of all solar systems rarely coincides with zero local demand.
2. **Smart Inverter Mandate:** Instead of a cap, NEPRA should mandate that all new grid-tied inverters must be "Smart Inverters" capable of remote curtailment or automated voltage regulation.
3. **Upgrade Fund:** Propose that the Rs. 1000/kW fee collected by NEPRA/DISCOs be ring-fenced into a "Grid Modernization Fund" specifically used to upgrade transformers that reach 90% capacity, ensuring no citizen is denied the right to generate clean energy.

III. Financial Viability & Net Billing Transition

Regulation Referenced: Regulation 14, Sub-regulation (1) Explanation:

"Explanation: 'net billing arrangement' means an arrangement under which electricity generated by distributed generation facility of prosumer is purchased by the licensee and the licensee raises the bill on the prosumer for his consumption at the applicable tariff, after giving credit for electricity supplied by prosumer to the licensee at the national average energy purchase price." (p. 6)

PSA Comment:

- **Economic Unviability (The "Savings Gap"):** Under the current 2024/2025 retail tariff, a prosumer buys electricity at an average of Rs. 50-60/kWh (including taxes/surcharges). By offering only Rs. 11-30/kWh for exports, NEPRA is creating a 400-500% price disparity. This means a prosumer must export 5 units to the grid just to "offset" the cost of 1 unit they consume at night. This math makes solar an "expense" rather than an "investment."
- **Middle-Class Exclusion:** The 1.5 to 2-year payback was the primary driver for middle-income households to adopt solar as a hedge against inflation. A 4 to 7-year payback period, combined with high interest rates in 2025, makes solar financing nearly impossible. This regulation effectively reserves solar only for the ultra-wealthy, leaving the struggling middle class tied to high DISCO bills.
- **Risk of Grid Defection (The "Death Spiral"):** When the "Buy-Back" rate is too low, prosumers stop exporting. Instead, they invest in Hybrid/Off-Grid Battery Storage (BESS). In 2025, as battery prices drop, consumers will choose to disconnect from the grid entirely. This leaves the DISCOs with even fewer paying customers, forcing them to raise rates further for the poor—a phenomenon known globally as the "Utility Death Spiral."
- **Misalignment with NAPP Logic:** The NAPP is calculated based on massive IPPs (Coal, Gas, Nuclear) that received government guarantees, land, and infrastructure. Prosumers provide "distributed energy" at zero cost to the government—no fuel, no sovereign guarantees, and no transmission losses. Paying them the same "base price" as a massive coal plant is technically and economically unfair.

Supporting Example:

- **The Vietnam Crisis (2021-2023):** Vietnam's solar market was the fastest growing in Southeast Asia until the government slashed export rates. The result was a market crash in the rooftop segment, leading to the bankruptcy of specialized solar firms and a massive loss of investor confidence in the country's energy sector.
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- **Regulatory Overreach (Systems <25kW):** By pulling the approval of small residential systems (under 25kW) away from DISCOs and back to NEPRA (Regulation 4), the Authority is creating a massive administrative bottleneck. NEPRA, as a federal regulator, is not equipped to process thousands of individual residential applications monthly. This centralization serves no technical purpose but adds weeks of "transit time" for documents between the DISCO and NEPRA.
- **The "Entry Tax" (Rs. 1,000/kW):** Charging a fee of Rs. 1,000 per kW (Schedule-IV) creates a significant upfront cost. For a 10kW residential system, this is an additional Rs. 10,000 for a "concurrence" that is essentially a rubber-stamp exercise. When added to the cost of the green meter, the earthing, and the technical study, the "soft costs" of solar in Pakistan are becoming some of the highest in the region.
- **Lack of Transparency:** Without an online tracking system, prosumers are left at the mercy of lower-level DISCO staff. This manual "file-moving" system is the primary driver of petty corruption and "facilitation payments" required to get a net meter installed.

Statistical Data/Global Example:

- **United States (SolarAPP+):** The U.S. Department of Energy launched SolarAPP+, an automated permitting portal. In jurisdictions using this, the "Time to Permit" for residential solar was reduced from 20 days to zero (instant approval).
- **India (National Portal for Rooftop Solar):** In 2025, India's PM Surya Ghar Portal allows consumers to track their application from feasibility to subsidy release in real-time, significantly reducing the role of DISCO middlemen.

Recommendation:

1. **Restore Decentralization:** Empower DISCOs to grant final approval for all systems below 25kW without requiring NEPRA's concurrence. NEPRA should act as an auditor, not a processor, for small-scale residential solar.
2. **Implement a Unified Portal:** PSA recommends the launch of a National Prosumer Portal. Applications should be submitted digitally, and every step

(Technical Review, Payment, Inspection) must be timestamped and visible to the applicant.

3. **Automatic "Deemed Approval":** To enforce the 15-day technical review limit (Reg 3(6)), the regulation must state that if no objection is raised in writing within 15 days, the application is legally deemed approved, allowing the applicant to proceed with payment and installation.

4. **Exempt Small Systems from Fees:** Waive the Rs. 1,000/kW fee for systems under 25kW. The government should be subsidizing the *process* of going green, not taxing it.



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4. SUMMARISE TABLE OF ISSUES IDENTIFIED & RECOMMENDATIONS

Regulation / Clause	Subject Matter	Issue Identified by PSA	PSA Recommendation
Regulation 3(2)	System sizing limited to sanctioned load	Sanctioned load is an outdated administrative value that ignores inverter efficiency losses, future electrification needs (EVs, heating/cooling), and real-world DC-AC ratios. Restriction prevents optimal system design and future-proofing.	Allow system sizing up to 1.5× sanctioned load , or permit additional capacity based on demonstrated future load (e.g., EV ownership). Introduce an automatic 30–50% growth buffer to support electrification.
Regulation 3(3)	Mandatory load flow study for ≥ 250 kW systems	Blanket requirement imposes high costs on SMEs, even where feeders have adequate hosting capacity, creating an unnecessary entry barrier.	Apply load flow studies only where DISCOs demonstrate feeder constraints . Introduce a risk-based or fast-track approval process for unconstrained feeders.
Regulation 3(5). Second Proviso	80% distribution transformer capacity cap	Static cap creates first-mover advantage, blocks otherwise viable connections, and ignores the fact that rooftop solar reduces transformer loading during peak demand hours.	Increase allowable limit to 100% of transformer capacity and replace static caps with dynamic hosting capacity management using smart inverters and monitoring.
Regulation 14(1) – Explanation	Net billing at National Average Energy Purchase Price (NAPP)	Export compensation reduced by ~60%, creating a 4–5× price disparity between import and export tariffs, making solar financially unattractive for middle-income consumers and SMEs.	Introduce a solar export floor price linked to avoided variable generation cost plus a green premium (approx. Rs. 25–30/kWh). Implement tiered buyback rates to protect small residential systems.
Regulation 7(1)	Contract duration reduced to 5 years	Five-year term is misaligned with system payback periods and asset life, increases regulatory uncertainty, and discourages	Reinstate minimum 7-year contract term , include automatic renewal clauses , and explicitly protect existing contracts from future tariff or billing

		financing and long-term investment.	changes (grandfathering).
Regulation 12(1)	Prosumer bears full interconnection costs	Full cost allocation ignores system-wide benefits of distributed solar and leads to double recovery through tariffs.	Adopt a shared-cost approach for interconnection assets that provide broader network benefits.
Regulation 12(2)	Prosumer bears cost of distribution system upgrades	Prosumers are charged for upgrades that often benefit future connections and overall grid performance.	Socialize network upgrade costs where benefits extend beyond the connecting prosumer, consistent with international practice.
Schedule IV (Reg. 4(2)(b))	Rs. 1,000/kW concurrence fee	Per-kW fee creates high upfront "entry tax," particularly burdensome for residential and SME systems.	Waive concurrence fee for systems below 25 kW and cap fees for larger systems. Ring-fence collected funds into a Grid Modernization Fund .
Regulations 3 & 4 (Application Process)	Centralized approval and extended timelines (up to 81 working days)	Lengthy, manual process delays commissioning, increases financing costs, and creates administrative bottlenecks and transparency concerns.	Restore DISCO-level approval for systems below 25 kW , implement a national digital prosumer portal , and introduce deemed approval if timelines are not met.

5. CONCLUSION

In light of the foregoing analysis, the Pakistan Solar Association respectfully urges — NEPRA to reconsider and recalibrate the Draft Prosumer Regulations, 2025 to ensure that necessary grid management objectives are achieved without undermining the economic viability of distributed solar generation or eroding investor and consumer confidence. Solar prosumers are not a burden on the power system; rather, they are private citizens and businesses investing their own capital to reduce peak demand, lower system losses, and mitigate Pakistan's energy and foreign exchange challenges. A balanced, data-driven regulatory approach—grounded in technical realities and international best practice—will allow NEPRA to safeguard grid stability while preserving the progress made in clean energy adoption. PSA therefore requests that these concerns be given due consideration and that a public hearing be convened to allow stakeholders to present the supporting technical and economic evidence in detail.

Sincerely,

Mr. Waqas Moosa

Waqas
Chairman

Pakistan Solar Association (PSA)

www.pakistansolarassociation.org



PAKISTAN SOLAR ASSOCIATION

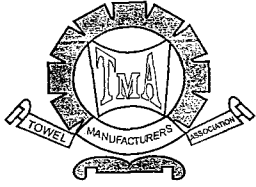
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Towel Manufacturers' Association Of Pakistan

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E-mail : tma@towelassociation.com Website : www.towelassociation.com

FL-2026/TMA/0005

January 3, 2026

The Chairman

National Electric Power Regulatory Authority (NEPRA)

Islamabad, Pakistan

Concerns Regarding NEPRA (Prosumer) Regulations, 2025 Request for Policy Reconsideration

Respected Sir,

On behalf of the trade and export community, I wish to express serious concerns regarding the recently notified *NEPRA (Prosumer) Regulations, 2025*, which replace the earlier Net Metering framework with a Net Billing arrangement. While we appreciate NEPRA's efforts to regulate distributed generation, the new policy carries significant risks for Pakistan's industrial competitiveness, household affordability, energy sustainability, and foreign exchange stability. These measures also raise doubts that the entire exercise is designed to safeguard Independent Power Producers (IPPs). A comparison between IPPs and Solar Rooftop users clearly reveals a pattern of favoritism toward IPPs, effectively undermining Solar Rooftop initiatives—much like the precedent set with CNG and Captive Power Plants in the past.

Feature	Independent Power Producers (IPPs)	Solar Prosumers (Rooftop Users)
Buyback Rate	Average Rs 25–26/unit (total PPP)	Rs 10–13/unit (new 2025/26 rate)
Payment Model	Take-or-Pay: Paid even if grid doesn't use the power	Net-Billing/Gross-Metering: Paid only for surplus exported
Contract Security	25–30 years sovereign guarantees	5–7 years contracts (subject to revision)
Risk Protection	USD Indexation: Profit protected against Rupee devaluation	No Indexation: Paid in fixed PKR; exposed to inflation/devaluation
Infrastructure	Govt provides land, easy loans, and facilitates connections	User pays 100% for panels, inverter, and green meter
Grid Fees	Paid "Capacity Charges" to stay available	Charged "Fixed Charges" for using the grid as backup
Taxes/Duties	Major exemptions on imports and income	Standard taxes; limited localized subsidies

1. Impact on Industrial Cost-Cutting Strategy

- Industries adopted renewable energy, particularly solar, as a **cost-cutting measure** to offset rising electricity tariffs.

Forwarded please.

☒ For nec. action ☐ For Information

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<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EPRM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN

Dy No. 210

Date: 08-01-26



Affiliated with the Federation of Pakistan Chambers of Commerce and Industry

NEPRA

REGISTRAR OFFICE

Diary No: 577
Date: 08/01/26

- Under net metering, the financial viability of rooftop solar projects encouraged widespread adoption.
- The shift to net billing, where exported electricity is credited at the **national average energy purchase price (NAEPP)** instead of retail tariff, **reduces the incentive** for industries to invest in renewable energy.
- The export rate has been fixed at Rs. 11–13 per unit, compared to the import price of Rs. 60 per unit. This pricing structure reflects a return on investment (ROI) that effectively bridges a gap of nearly 500%.

This policy shift will directly raise production costs, undermining competitiveness in both domestic and international markets. We risk witnessing history repeat itself, much like the challenges faced during the CNG and Captive Power Plant eras.”

2. Risk of Shift Back to Carbon-Based Energy

- With reduced economic viability of renewable projects, industries and households may revert to **fossil fuel-based captive generation** (coal, furnace oil, diesel).
- This reversal undermines Pakistan’s commitments to **green energy transition** and climate change mitigation.
- It will also increase the country’s **carbon footprint**, making our exports vulnerable to **Carbon Border Adjustment Mechanisms (CBAM)** in Europe and other developed markets.

3. Threat to Export Competitiveness

- Exporters to Europe and other regions face **carbon taxes** if their production is not powered by renewable energy.
- The new policy risks discouraging renewable adoption, thereby exposing exporters to **higher carbon tariffs**.
- This will lead to a **decline in exports**, reduced foreign exchange inflows, and loss of market share in competitive sectors such as textiles, leather, and agro-based products.

4. Macroeconomic Consequences – Oil & Gas Imports

During the last three years, Pakistan has successfully reduced oil and gas imports, saving billions in foreign exchange. This achievement is directly linked to the adoption of rooftop solar and distributed generation, which offset fossil fuel demand.

Oil & Gas Import Trends (Last 3 Years)

Year	Oil Import Bill (USD bn)	Gas Imports (billion cubic meters)	Trend vs. Previous Year	Economic Impact
2022–23	\$13.0 bn	~11.0 bcm	High baseline year	Heavy pressure on reserves
2023–24	\$10.58 bn	~9.34 bcm	↓ Oil imports fell ~19%; Gas ↓ 15%	~\$2.5 bn foreign exchange savings
2024–25 (Jul–Feb)	\$10.71 bn	~10.0 bcm	Oil ↑ 1.2%; Gas ↑ 7%	Early signs of reversal

Sources: Pakistan Bureau of Statistics (PBS), CEIC/OPEC data

Observation:



- Declining imports in FY2023–24 saved Pakistan nearly **\$2.5 billion** in foreign exchange.
- This progress is now at risk: discouraging solar adoption will **increase fossil fuel demand**, reversing savings and worsening the trade deficit.
- Rising imports will expose Pakistan to **IMF/World Bank pressure** for stricter taxation, further burdening industries and households.

5. Recommendations

We respectfully urge NEPRA to reconsider the following:

- ✓ **Retain Net Metering for Industrial and Residential Consumers** to safeguard competitiveness and affordability.
- ✓ Introduce a **differentiated tariff mechanism** (industries/exporters vs. households).
- ✓ Encourage **hybrid solar + storage solutions** to strengthen resilience against load shedding.
- ✓ Recognize the **foreign exchange savings** from reduced fossil fuel imports as a national priority.
- ✓ Engage stakeholders, including trade associations, exporters, and consumer groups, in a **consultative dialogue** before finalizing implementation.

Conclusion

Pakistan's energy policy must balance grid sustainability with industrial competitiveness, household affordability, and climate obligations. The current shift to net billing risks reversing hard-earned progress in renewable adoption, while exposing exporters to punitive carbon taxes abroad and increasing fossil fuel imports. We strongly request NEPRA to revisit this policy in consultation with stakeholders to safeguard Pakistan's economic and environmental future.

Yours sincerely,



Ather Bari
Chairman



Date: [03, January 2026]

To,
The Registrar,
National Electric Power Regulatory Authority (NEPRA),
NEPRA Tower, Attaturk Avenue (East), G-5/1,
Islamabad.

Forwarded please:

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Subject: Formal Comments and Objections regarding the Draft NEPRA (Prosumer) Regulations, 2025

Dear Sir,

We, **Primage Pvt Ltd**, a registered member of the Pakistan Solar Association (PSA) and a stakeholder in the renewable energy sector, hereby submit our formal response to the Draft Prosumer Regulations, 2025.

While we acknowledge the need for grid stability, we believe the current draft contains several provisions that will dismantle the solar industry, discourage private investment, and penalize citizens for adopting clean energy. Our specific objections are as follows:

1. Disparity in Export Rates (Net Billing Model)

The proposed transition to a "Net Billing" model using the National Average Energy Purchase Price (NAPP)—estimated at Rs. 11.30/kWh—is economically unviable.

- **The Issue:** Charging prosumers ~Rs. 60/kWh for imports while paying them ~Rs. 11/kWh for exports creates a 500% price gap.

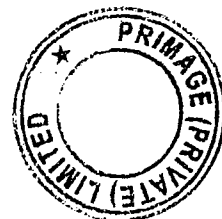
Our Demand: Price for export unit should be equal to the import unit.

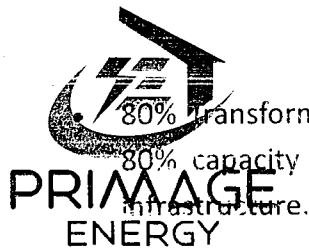
2. Arbitrary Capacity and Transformer Caps

- **100% Sanctioned Load Limit:** Restricting system capacity to 100% of the sanctioned load ignores future electrification (EV charging, heat pumps etc.). We recommend restoring the 150% (1.5x) buffer to allow for future-proofing households.

REGISTRAR OFFICE
Diary No: 565
Date: 09/01/26

(Signature)





PRIMAGE (PVT) LTD.

80% transformer Capacity: Barring new solar connections once a transformer reaches 80% capacity penalizes late adopters due to need for transformer upgrade infrastructure.

Government Approved Contractor
Approved Consultant, Contractor, Energy Auditor

3. Reduction in Agreement Term (5 Years)

- **The Issue:** Reducing the contract duration from 7 years to 5 years creates immense uncertainty for financiers and consumers (For example ROI). No other power generation contract in Pakistan is as short as 5 years.

Our Demand: We strongly urge that the existing 7-year contract duration be maintained.

4. Mandatory Licensing for Small-Scale Systems

- **The Issue:** Requiring a NEPRA license for systems under 25 kW adds unnecessary bureaucratic hurdles and costs for residential users.

Our Demand: Systems under 25 kW should be exempt from NEPRA licensing requirements.

5. Protection of Future Consumers

The Issue: The draft remains vague on the transition of existing prosumers after their current 7-year terms expire. This shift from net-metering to net-billing will reduce the system's transparency and equality for new solar users.

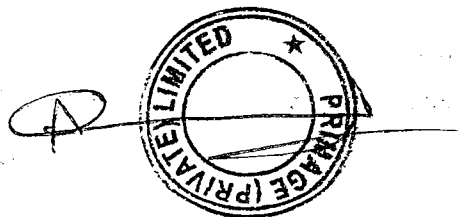
- **Our Demand:** Clear, transparent transition rules must be defined for existing prosumers after their 7-year terms, ensuring fairness and equal treatment during any shift from net-metering to net-billing.

Conclusion

The 2025 Draft Regulations, in their current form, protect the inefficiencies of DISCOs at the cost of the Prime Minister's "Clean Green Pakistan" vision. We urge NEPRA to hold a consultative workshop with all the stakeholders including Pakistan Solar Association (PSA) to revise these points before final notification.

Sincerely,

MUHAMMAD ASLAM KHAN
PRIMAGE PVT LTD
0309-5555713



Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CICCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Date: January 8, 2026.

No: REAP/26-0017.

To

Mr. Waseem Anwar Bhinder
Director General (Admin/HR)/Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad, Pakistan

Addl. DG	Dir.	Addl. Dir.	DD-I
AD-I	RO	PS	E/S
TA	OA-I	OA-II	OA-III

Subject: Representation Against Proposed Amendments to the Net Metering Policy

Respected Sir,

On behalf of the **Renewable Energy Association of Pakistan (REAP)** We formally oppose the current proposed amendments to the policy due to material inconsistencies in the supporting data and the absence of stakeholder consultation.

However, the recent proposed amendments to Net Metering Regulations have raised significant concerns among solar businesses and consumers. The transition from net metering to Net billing and the substantial reduction in the purchase rate of solar generated electricity pose serious challenges to the continued growth and sustainability of the solar industry.

1. Questionable Data Basis for Policy Revision

The recent policy amendments cite grid impact, cross-subsidy burden, and financial stress on DISCOs as primary justifications. However:

- **No publicly disclosed, independently verifiable dataset** has been shared detailing:
 - Actual net financial impact of prosumers on DISCO revenues.
- **NEPRA State of Industry Reports and CPPA-G power procurement data** consistently indicate that:
 - Peak daytime generation was largely met through **high-cost thermal generation**, while solar generation offsets these costs.
 - Capacity payments the dominant driver of sectoral losses are **contractual and independent of net metered energy volumes**.

In absence of transparent modeling and published assumptions, the **data foundation of the revised policy remains questionable**.

2. Net Metering Share in Overall Installed Capacity

As per available data, the **Total installed power generation capacity** of Pakistan is approximately **46 GW**, whereas the cumulative installed capacity under **Net Metering** stands close to **6.8 GW**. which clearly indicates that net metering constitutes a relatively small and manageable portion of the national power system. Characterizing net metering as

NEPRA
Licensing Department
Diary No. 279
Date: 12-01-2026

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Diary No: 624
Date: 09/01/26

a dominant or destabilizing factor in the grid is therefore not supported by data, other factors i.e. (T&D losses, theft of electricity, Capacity charges, off grid systems, agriculture solarization, behind the meter installations) should be taken in account that are actually damaging the energy infrastructure.

Total Installed Power Generation Capacity	46 GW
Installed Net metering Capacity	6.8 GW
Off-Grid Capacity	No Data
Agriculture Solarization	No Data
Behind the meter Installation's	No Data

3. Energy Contribution and Financial Impact

The annual energy export of net-metered solar systems (approximately 6.8 GW installed) translates to nearly 3.3 TWh (terawatt-hours) per year, as per provided data by NEPRA.

In the context of Pakistan's total annual electricity generation of over 100 TWh, net metering contributes less than 3.3% of total energy, while significantly reducing marginal generation costs. When evaluated against avoided fuel costs, transmission losses, and peak time generation expenses, the net financial impact is substantially positive, rather than burdensome, for the power sector.

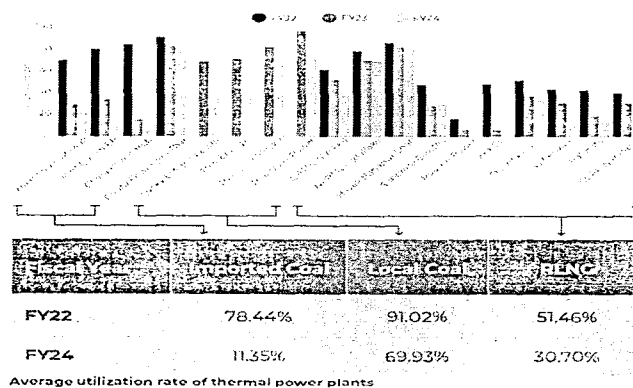
4. Reduction in Fuel Import Bill

Net-metered solar generation directly offsets electricity that would otherwise be produced using imported fuels such as RLNG, furnace oil, and coal. Each unit generated through rooftop solar displaces fuel-based generation, thereby:

- Reducing foreign exchange outflows
- Lowering exposure to global fuel-price volatility
- Improving the national current account balance

It is widely acknowledged that distributed solar generation has contributed to a measurable reduction in Pakistan's fuel import bill, particularly during daylight peak hours.

% Utilization of thermal plants, FY22 - FY24



Learn more in Renewables East 2025, "Pakistan Energy Market Review"
Data Source: NEPRA Performance Evaluation Report, PACRA Coal Mining and Trading Report 2023, REE

5. Risk of Grid Defection and Increase in Capacity Charges

Any abrupt or unfavorable change in the net metering framework will make the solar system financially unviable and will encourage the consumer to leave the GRID and strongly incentivize consumers to shift toward battery storage systems and partial or full grid defection. This outcome would have serious implications:

- Reduced energy offtake from the grid
- Fixed capacity payments spread over a shrinking consumer base
- Increase in per-unit capacity charges for remaining grid consumers

Such an outcome would be counterproductive and would exacerbate the capacity charge issue the proposed amendments aim to address. The grid loses the "free" daytime generation that currently helps meet peak summer demand.

6. Regulatory Compliance and Tax Contribution

Net metering systems in Pakistan are formally regulated, requiring approvals from DISCOs, bi-directional metering, and compliance with NEPRA regulations. Furthermore:

- Equipment is imported or manufactured through documented channels
- Sales and services are subject to sales tax.
- System owners are already part of the formal economic and tax framework

Thus, net metering is not an informal or unregulated activity, but a compliant, documented, and auditable segment of the power sector.

7. Technical Benefits

The net-metering initiative in Pakistan has demonstrated significant benefits, including, but not limited to, improved voltage stability and reduced T&D losses.

8. Increased installed capacity, T&D losses, OFF-GRID installations, Behind the meter installations & less recoveries the main culprit behind the capacity charges

According to the available data the installed capacity doubles over a time span of 10 years yet the units consumed / sold increase maximum by 39% the extra installed capacity hence is the main issue in capacity payments as our maximum peak demand touches 30,000 MW on peak.

Fiscal Year	Installed Capacity (MW, approx. end-of-year)	Total Units Consumed/Sold (GWh)	Capacity Charges Per Unit (PKR, approx.)
FY2024	42,512	127,837	~17
FY2025	46,605 (March)	90,000~100,000 (Approx.)	~17-18 (Approx.)



RENEWABLE ENERGY
ASSOCIATION PAKISTAN

The aggregate T&D losses of all DISCOs combined during FY 2023-24 have increased to 18.31% as compared to 16.84% during FY 2022-23. It is pertinent to highlight here that NEPRA's allowed average target of T&D losses for FY 2023-24 was 11.77%. Thus, all DISCOs combined have exceeded the target by 6.54%. This breach of target contributed around Rs. 276 billion in circular debt for FY 2023-24. This is despite the fact DISCOs have been allowed an investment amount of Rs. 163.1billion for FY 2023-24 to improve their network.

We therefore request NEPRA to reconsider any drastic or abrupt changes to the net metering regime and instead adopt a data driven, gradual, and consultative approach that protects investor confidence, encourages clean energy adoption, and aligns with Pakistan's long term energy security objectives.

We remain available for any technical discussion or stakeholder consultation in this regard to develop a balanced policy.

Regards,
Engr. Syed Usman Ali
Chairman REAP
0313-5650091
Plot # 209, Industrial Estate,
Kahuta Triangle Islamabad





GOVERNMENT OF PAKISTAN
MINISTRY OF ENERGY POWER DIVISION, ISLAMABAD



SUBJECT: THE NEPRA (PROSUMER) REGULATIONS, 2025

The undersigned is directed to refer to the letter No. NEPRA/DG(Lic)fNMR-01/ o7-59 , dated 2nd January, 2025 and to state that response of PPIB and PPMC is attached herewith for further necessary action at your end, pl.

Ruby Nawaz

Ruby Nawaz
Section officer (Policy)

Registrar-1, National Electric Power Regulatory Authority, Islamabad (NEPRA), Islamabad
Ministry Of Energy Power Division, Islamabad No.10(14)/2025-POLICY Dated 23 January ,

2026

Copy for information to:-

- 1- Addl Secretary-II, MOEPWD, Islamabad
- 2- Sr. Joint Secretary (Policy), MOEPWD, Islamabad
- 3- Deputy Secretary (Policy), MOEPWD, Islamabad

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please.

1. Chairman
2. M (Tech)
3. M (Law)
4. M (Dev)

26.01.26

Addl. DG	Dir.	Addl. Dir.	DD-I
AD-I	RO	PS	E/S
TA	QA-I	QA-II	QA-III

REGISTRAR OFFICE
Diary No: 1404
Date: 26.1.26

NEPRA
Licensing Department
Diary No: 484
Date: 27-01-26



GOVERNMENT OF PAKISTAN
PRIVATE POWER & INFRASTRUCTURE BOARD



No.B/3/2/GC/19

Islamabad, the 13th January , 2026

From

Sheeraz Anwar
Director General-Solar

To

1- Registrar-1, NEPRA, Islamabad

SUBJECT: THE NEPRA (PROSUMER) REGULATIONS, 2025

This is with reference to NEPRA letter No. NEPRA/DG(Lic)/NMR-01/07-59 dated January 02, 2026, regarding the subject matter.

2. At the outset, PPIB supports the proposed transition from Net Metering to Net Billing as a progressive step towards establishing a balanced, transparent, and sustainable framework for Distributed Energy Resources (DERs). The proposed approach maintains reasonable incentives for prosumers while safeguarding the interests of other grid-connected consumers and ensuring the long-term financial and operational stability of the power sector. PPIB's comments on the draft Regulations are provided below for the consideration of the Authority:

I. Reference to IEEE Standards: Clause 9(5) of the draft Regulations requires inverter compliance with IEEE 1547-2003. It is recommended that this reference be updated to IEEE 1547-2018, as the latest version incorporates significant enhancements related to smart inverter functionality, grid support features, interoperability, and communication requirements. This version is widely adopted internationally and is more aligned with modern grid operational needs.

II. Applicability of Grid Code and Distribution Code: The draft Regulations refer to compliance with the Grid Code at various places. However, the NEPRA Grid Code is applicable to systems operating at 66 kV and above, whereas the NEPRA Distribution Code governs networks at 132 kV / 66 kV / 11 kV / 0.4 kV.

Furthermore, under Clause 2(c), an "Applicant" is defined as a domestic, commercial, or industrial consumer connected at 3-phase 400 V or 11 kV. Therefore, it is recommended that the Regulations explicitly require compliance with the relevant applicable code, i.e., the Grid Code or the Distribution Code, as appropriate, to avoid ambiguity and ensure regulatory clarity.

III. Distribution Transformer Loading Criterion: Clause 3(5) of the draft Regulations specifies an 80% distribution transformer loading threshold, beyond which no additional applications shall be permitted. While the intent of this provision from a system protection and planning margin perspective is understood, the application of a fixed threshold based solely on connected DER capacity does not accurately reflect actual network loading or reverse power flow conditions. In practice, power exported towards the distribution transformer is limited to the surplus generation remaining after serving the instantaneous localized

feeder load and is therefore inherently time-dependent. As a result, connected DER capacity alone is not a reliable indicator of transformer loading or the likelihood of sustained reverse power flow.

It is therefore recommended that DISCOs be encouraged to develop feeder-wise / grid-wise Hosting Capacity Maps (HCMs) based on detailed technical and time-series studies. Such an approach would enable identification of actual network constraints on a case-by-case basis, rather than imposing a uniform threshold across all feeders irrespective of their individual loading profiles and network characteristics.

IV. Application Processing Timelines: Pursuant to Clause 3(6) of the Regulations, a period of 15 days has been prescribed for the initial technical review, subsequent to the 5 days allocated for verification of the completeness of the application documents, and an additional 3 days for communication in case the application is found to be incomplete after review. These cumulative timelines appear to be relatively on the higher side. It is therefore suggested that the timelines prescribed under each step be rationalized and further streamlined to enable early licensing, improve procedural efficiency, and facilitate timely deployment for consumers.

V. Licensing Mechanism for Small-Scale Systems: Pursuant to S.R.O. 1448(I)/2021, the Federal Government, after consultation with NEPRA, has notified that distributed generation facilities using solar or wind power up to 25 kW, connected to the network of a distribution licensee through a net metering facility, do not require a generation licence from NEPRA.

The draft Regulations do not explicitly reflect this exemption, which may create the perception that all prosumers are required to obtain a licence. It is therefore recommended that this exemption be clearly incorporated in the updated Regulations to ensure continuity, regulatory consistency, and clarity for consumers.

VI. Metering Requirements: Pursuant to Clause 5(a)(i), consumers are permitted to install a standard bidirectional meter for net billing purposes. However, in view of the fact that DISCOs are already undertaking large-scale deployment of Advanced Metering Infrastructure (AMI) meters under prevailing government policy, and are increasingly requiring existing net-metered consumers to migrate to AMI meters, this approach may result in duplication of costs for consumers.

It is therefore recommended that the revised Regulations mandate the installation of AMI meters as a compulsory requirement for all new net billing/prosumer connections. This would ensure uniformity across DISCOs, avoid duplication of costs, and enhance grid visibility, billing accuracy, and overall system monitoring capabilities.

3. PPIB remains available to provide any additional technical input or clarification as may be required by the Authority to facilitate the effective implementation of these Regulations.



Sheeraz Anwar
Director General-Solar
Ph:051 9202082

Copy for information to:-

- 1- Secretary, MOEPWD, Islamabad
- 2- Managing Director-PPIB, PPIB, Islamabad



Sheeraz Anwar
Director General-Solar
Ph:051 9202082

10/05/2018
10/05/2018
10/05/2018



GOVERNMENT OF PAKISTAN
MINISTRY OF ENERGY & POWER DIVISION, ISLAMABAD
P.O. BOX 1000, ISLAMABAD



No.10(14)/2025-POLICY

Islamabad, the 06th January , 2026

From

Ruby Nawaz
Section officer (Policy)

To

- 1- Managing Director, PPMC, Islamabad
- 2- Managing Director-PPIB, PPB, Islamabad

SUBJECT: THE NEPRA/PROSUMER REGULATIONS, 2025

Please find enclosed the Memo's No. NEPRA/DG(Lic)fNMR-01/ 07-59, dated 2nd January, 2025 on the subject cited above.

02. In view of the above, it is therefore requested to share your views/comments on the subject matter within 07 working days of the date of the urgency of the matter. The draft of Prosumer Regulations has been made available on the website of NEPRA i.e. nepra.org.pk/news.php and can be accessed/consulted for reference, etc.

Ruby Nawaz
Section officer (Policy)

Copy for information to:-

- 1- Addl Secretary to Government, Islamabad
- 2- Sr. Joint Secretary to Government, Islamabad
- 3- Deputy Secretary to Government, Islamabad

Ruby Nawaz
Section officer (Policy)



GOVERNMENT OF PAKISTAN
POWER PLANNING AND MONITORING COMPANY



No.PPMC/FPRA/GEN/2025/06

Islamabad, the 16th January , 2026

From

Waleed Bin Usman
Team Lead (Legal)

To

1- Section officer (Policy), MOEPWD, Islamabad

SUBJECT: THE NEPRA (PROSUMER) REGULATIONS, 2025

With reference to subject letter No. 10(14)/2025-POLICY, the comments are as follows:

Sr. No.	Draft Regulation	Remarks/ Comments
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Mosim / 04
Re
28 Jan 2026

1.

21. Savings and Repeal.— (1) The National Electricity Power Regulatory Authority (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015 shall stand repealed upon coming into force of these regulations.

(2) Notwithstanding the repeal effected by these regulations, nothing shall affect or be deemed to affect, the licence issued and agreement executed under the repealed regulations before commencement of these regulations except the billing shall be in accordance with regulation 14 commencing from the billing cycle subsequent to the month in which these regulations come into effect. Provided that distributed generators having pre-billed agreements executed under the repealed regulations, shall be billed in accordance with the national average power purchase price till the expiry of the term of their agreement and thereafter shall be billed in accordance with the national average energy purchase price for future renewals.

(3) Upon expiry of the term of the agreement executed under the repealed regulations, any extension in the agreement shall be in conformity with these regulations and the arrangements shall be brought in conformity with these regulations.

Explanation: For the purpose of this regulation, the term "distributed generator" includes any undertaking distributed generation in conformity with these regulations.

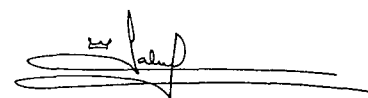
It is noted that the new regulation are silent on the modifications to be done in future by the DGs licensed under repealed regulations, therefore, suitable language may be added in the saving clause to restrict modification by such DGs and in case of any proposed modification by such DGs shall be treated under the new regulation as a new prosumer applicant and shall secure a fresh concurrence from the Authority for the entire DG Facility with such rates applicable under draft NEPRA Prosumer Regulations 2025.

2. General Comments

It is recommended that the agreement clauses referred to in the draft NEPRA Prosumer Regulations 2025 shall also include clauses to the effect that any amendments/revisions made by the Authority in the Regulations shall be deemed to have been incorporated and take effect to the extent of executed agreements as well.

Further recommended that the above suggested language shall also form part of the substantive portion/ clauses of the proposed regulations.

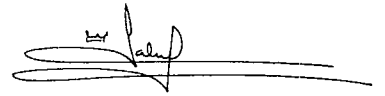
Furthermore, it is recommended that a standard amendment to regulations clause be added.



**Waleed Bin Usman
Team Lead (Legal)**

Copy for information to:-

1- SO to Managing Director, PPA, Islamabad



Waleed Bin Usman
Team Lead (Legal)



Thursday, January 01, 2026

Mr. WASIM ANWAR BINDER
Registrar/Public Information Officer
NATIONAL ELECTRIC POWER REGULATORY AUTHORITY
NEPRA TOWER ATTATURK AVENUE (EAST)
SECTOR G-5/1, ISLAMABAD.

Forwarded please:

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<input checked="" type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTBCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Subject: **CONCERNS REGARDING THE PROPOSED DISCONTINUATION OF NET-METERING.**

Dear Sir,

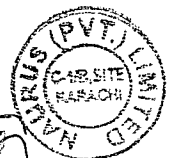
I hope this message finds you well. I am writing to formally express my serious concerns regarding the proposed discontinuation of the current net-metering regime, as well as its potential replacement with a net-billing or gross-billing mechanism, as reflected in the recent draft rules issued by NEPRA.

While the challenges facing Pakistan's power sector are acknowledged, I believe that the proposed policy shift may lead to significant negative consequences for the nation's economy, energy security, environmental commitments, and international reputation. Below, I outline several key issues that merit careful consideration.

1. Adverse Impact on Small Consumers and Renewable Energy Adoption

Net metering has played a pivotal role in enabling small residential consumers (≤ 15 kW) to adopt rooftop solar energy systems, providing them relief from high electricity tariffs while simultaneously contributing clean energy to the national grid. As of November 2025, Pakistan has approximately more than 4 Lacs net-metering consumers, with nearly 70% being residential users.

Under the proposed net-billing model, exported solar electricity would be compensated at a significantly lower rate of Rs 9–13 per unit, compared to the much higher cost of imported electricity (Rs 55–65 per unit). This substantial disparity would result in greatly extended payback periods, making rooftop solar financially unviable for most households. Such a shift is in stark contrast to regional best practices, such as in our neighboring country, where net metering remains in place for systems up to 10 kW, promoting faster payback periods and sustained renewable energy growth.



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www.Naurus-Sundip.com



5. A Constructive Way Forward

Instead of discontinuing the net-metering regime, I respectfully suggest that NEPRA consider the following adjustments:

- Retaining net metering for residential systems up to 10 kW
- Introducing reasonable grid usage, line loss, or service charges where justifiable
- Exploring carbon credit mechanisms that would allow DISCOs to monetize emissions reductions in international markets
- Aligning energy policy with national objectives related to climate, industrial growth, and foreign exchange management

These measures would help balance system costs while preserving investor confidence, environmental benefits, and Pakistan's international obligations.

Conclusion

The discontinuation of net metering would risk reversing a rare and successful energy policy, with long-term consequences that far outweigh short-term fiscal considerations. A stable, forward-looking renewable energy policy is critical not only for Pakistan's energy future but also for its reputation as a responsible member of the global community.

I therefore earnestly request that NEPRA reconsider the proposed changes, engage in transparent public consultations, and adopt a more balanced approach that protects consumers, the environment, and Pakistan's national interests.

Thank you for your time and consideration.

Kind regards,



Tajammul Hussain Chishti
Executive Director
Naurus (Pvt) Limited.
C-1/B, Naurus Chowrangi.
S.I.T.E., Karachi.
Cell: +92 321-9201020

Cc: 1). Mr. Waseem Mukhtar, Chairman, NEPRA
2). Director General Consumer Affair Division, NEPRA



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Yours Sincerely,

Name: Malik Nadeem Afzal

Designation: Chief Executive Officer (CEO)

CNIC No.: 37405-4728917-5

Contact: 0327-5034220

Office No. 53, Ground Floor, Poonch House, Saddar, Rawalpindi
Contact No. 0327-5034220 & 0315-5219946
www.solarsky.com.pk



SOLAR SKY (PVT) LTD

Ref No.: SSL/2026/102

Date: 02 January 2026

Wasim Anwar Bhinder
Registrar Nepra
Nepra Tower, Attaturk Avenue (East)
Sector G-5/1, Islamabad.

Subject: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make Amendment

Dear Sir,

Reference to your publication regarding Prosumer Regulation 2025 in the newspaper dated 15th December 2025, I am writing as a concerned citizen and existing solar Net metering consumer to formally record my reservations regarding the recently proposed **"NEPRA Prosumer Regulations, 2025."** While I appreciate the Authority's efforts to ensure grid stability and manage the growing distributed generation capacity, however certain clauses in the draft are highly discouraging for renewable energy adoption in Pakistan.

1. Objection to the Change in Net Metering Mechanism

The shift from the existing Net Metering (unit-to-unit adjustment) to a Net Billing/Gross Metering model is a significant setback. By slashing the buyback rate to the National Average Energy Purchase Price (approx. Rs. 13/unit) while charging retail rates for imports (approx. Rs. 50-60/unit), the financial viability of solar investments for middle-class households is effectively destroyed.

The 2015 Regulations provided a fair incentive for citizens to invest their own capital to bridge the national energy gap. I request the Authority to revert to the original Net Metering mechanism to maintain consumer trust and continue the momentum of Green Energy.

2. Acceptance of Technical Constraints *Supported.*

I recognize that the rapid growth of solar generation poses technical challenges to the aging distribution infrastructure. In this regard, I find the following proposed changes to be reasonable and acceptable:

- ✓ Sanctioned Load Clause: Limiting the solar system capacity to 100% of the Sanctioned Load (instead of 150%) is a fair measure to ensure that the household's export does not exceed its authorized grid connection capacity.
- ✓ Transformer Capacity Clause: Restricting new connections once a transformer reaches 80% of its capacity is a logical technical safeguard to prevent local grid failures and protect equipment.

3. Re-evaluation of IPP Agreements and Capacity Payments

Beyond the technicalities of net metering, the primary driver behind the current energy crisis is the existence of unfair and unsustainable agreements with Independent Power Producers (IPPs). For decades, the national economy has been bled dry by "Take-or-Pay" clauses, where the government is forced to pay billions in "capacity charges" for electricity that is never actually produced or consumed. These dollar-indexed returns and sovereign guarantees have created an artificial tariff hike that is killing

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industrial productivity and pushing the common man below the poverty line. It is high time the government takes decisive steps to renegotiate or terminate these lopsided contracts, transitioning instead to a "Take-and-Pay" model. We cannot expect the public to subsidize the inefficiencies of the power sector and the excessive profits of a few influential groups while the rest of the country's economy remains in a state of paralysis.

4. Contribution to Reducing the National Fuel Import Bill

It is critical to acknowledge that Net-Metering consumers are not a burden, but a major contributor to the national exchequer. In FY 2024-25 alone, net-metered solar capacity in Pakistan crossed 5,800 MW, significantly reducing the need for expensive thermal power generation. By generating clean energy during peak daylight hours, consumers directly displace electricity that would otherwise be produced using imported FO (Furnace Oil) and RLNG (Regasified Liquefied Natural Gas). Recent data indicates that this decentralized generation has helped the country save billions in foreign exchange and even contributed to negative Fuel Charge Adjustments (FCA), providing relief to all grid consumers. Discouraging net metering now would essentially force the country back toward a heavy reliance on imported fossil fuels, further draining our precious foreign exchange reserves and worsening the trade deficit.

5. Environmental Survival and the Transition to Electric Vehicles (EVs)

Finally, it must be noted that Pakistan is already among the countries most vulnerable to climate change, with cities like Lahore and Multan suffering from hazardous smog levels every winter. Slowing down solar deployment by making it financially unviable will force a continued reliance on coal and oil-based power plants, which are primary contributors to particulate matter and poor air quality. Furthermore, the Government's own Electric Vehicle (EV) Policy depends entirely on the availability of economical and clean electricity. If net-metering benefits are withdrawn, the incentive for citizens to switch to EVs will vanish, as charging vehicles from an expensive and "dirty" national grid offers no relief. To achieve a "Clean Green Pakistan" and a smog-free future, the Authority must encourage solar energy as the backbone for an affordable EV charging infrastructure.

6. Recommendations

Instead of penalizing prosumers through reduced buyback rates, I urge NEPRA to:

- Maintain the unit-to-unit adjustment (Net Metering) as per the 2015 policy.
- Enforce strict compliance with Sanctioned Load and Transformer Loading limits to address grid stability.
- Re-evaluate expensive IPP Agreements
- Encourage Solar energy so that we can further reduce our import bill
- Wisely facilitate solar energy consumers to cater to escalating environmental challenges, ensuring that clean energy remains the primary tool for national growth rather than a casualty of regulatory shifts.

The proposed 2025 regulations, in their current form, will stall Pakistan's progress toward its renewable energy targets and increase the burden on already struggling consumers. I hope the Authority will consider these points during the public consultation process.



GUJRANWALA ELECTRIC POWER COMPANY LIMITED

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dgmirad@gepco.com.pk

OFFICE OF CHIEF EXECUTIVE OFFICER, GEP CO LTD.
(Market Implementation Regulatory Affairs Department)
WAPDA Rest House Peoples Colony Gujranwala.

No. MIRAD/CM&RA/ 8004-7

Dated 24/12/2025.

The Registrar,
National Electric Power Regulatory Authority,
NEPRA Tower, Attaturk Avenue (East),
G-5/1, Islamabad.

Subject: COMMENTS ON DRAFT NEPRA (PROSUMER) REGULATIONS, 2025.

Reference: Notice for Comments regarding the draft NEPRA (Prosumer) Regulations, 2025, published on the NEPRA Website.

With respect to comments desired in the subject cited draft, attached herewith please find comments / recommendations, based on review of relevant teams within GEP CO, so as to assist honorable Authority in arriving at well informed decision in the matter.

J. Rafique
(IRFAN RAFIQUE)
Director General (MIRAD)
GEP CO H/Q Gujranwala

Copy to:-

- 1) PSO to CEO, GEP CO for information please.
- 2) Chief Technical Officer GEP CO, Gujranwala.
- 3) Chief Financial Officer, GEP CO, Gujranwala.
- 4) Master File

NEPRA

Licensing Department

Diary No. 2161

Date: 31-12-25

Forwarded please:

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For kind information, please.

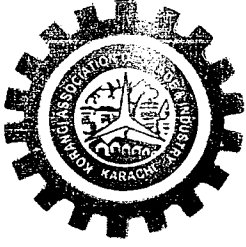
1. Chairman
2. M (Tech)
3. M (Law)
4. M (Dev)

GEPCO – Comments on draft NEPRA (Prosumer) Regulations, 2025

Sr. #	Regulation #	Summary Content	Comments / Recommendation
1	Definitions	Distribution Code	Definition of "Distribution Code" may be added, and all technical and operational references for DG facilities connected below transmission voltage should explicitly refer to the Distribution Code instead of the Grid Code.
2	Definitions	Premises	A clear and unambiguous definition of "Premises" should be inserted. It must strictly require that the Distributed Generation (DG) facility be physically located within the legal boundary of the same premises where the electricity connection exists, to prevent off-site, virtual, or remote installations.
3	Definitions	Grid Code	As the instant (draft) Regulations deal exclusively with DG facilities connected below minimum transmission voltage, the definition and repeated references to Grid Code may be deleted or replaced with Distribution Code, as applicable.
4	Regulation 3	Application Process	The application process should be fully digitized through mandatory online portals, with central hosting at NEPRA, with automated tracking, approvals, and record keeping. Reliance on paper-based submissions will cause delays and administrative inefficiencies as DG penetration increases.
5	Regulation 3(2)	DG Capacity vs Sanctioned Load	The provision should explicitly state that export MDI shall not exceed sanctioned load at any time. Violation of export limits should trigger enforcement actions as proposed under Regulation 5.
6	Regulation 3(5) – 2nd Proviso	80% DT Capacity Cap	<p>The static 80% distribution transformer capacity limit should be replaced with Hosting Capacity Analysis (HCA) at transformer and feeder levels. Static limits do not reflect actual network conditions.</p> <p>International best practices often reference broader system limits, such as 3% of the Distribution Company's peak demand and 15% of the Distribution Transformer Capacity (Regulatory framework for small-scale solar PV systems in Saudi Arabia referred)</p>

Sr. #	Regulation #	Summary Content	Comments / Recommendation
7	Regulation 5(1)(d)	Validation checks for unlawful extension	In case a prosumer (existing net-metering or future net-billing) is found exceeding sanctioned DG capacity (export MDI), the licensee shall have the right to suspend net-metering/net-billing facility. Restoration should only be allowed after load extension or removal of excess panels/inverters, and restoration shall be strictly under net-billing arrangement.
8	Regulation 5	Enforcement Mechanism	The Regulations should explicitly empower DISCOs to conduct technical audits, meter data analytics, and on-site inspections to detect unlawful DG expansion, inverter oversizing, or bypassing of export controls.
9	Regulation 9(1)	Protection Requirements	Reference to Grid Code should be replaced with Distribution Code, as DG facilities are connected at distribution voltage levels.
10	Regulation 9(5)	Technical Standards	The regulation should mandate compliance with IEEE 1547-2018, including IEEE 1547a-2020, IEEE 1547.1-2020, IEEE 1547.2-2023, or any subsequent amendments. Reference to IEEE 1547-2003 is obsolete.
11	Regulation 11	Voltage and Frequency Range	In addition to voltage and frequency limits, power factor and reactive power capability should be specified. Prosumers should be required to operate within defined PF limits (0.95) or provide reactive power support to mitigate voltage rise and network stress.
12	Regulation 13	Metering Requirements	AMI-based metering should be mandated for all prosumers to enable interval data, export MDI monitoring, remote disconnection, and grid visibility. This will also strengthen validation checks under Regulation 5(1)(d).
13	Regulation 14	Net Billing Arrangement	Only one net-billing arrangement per premises should be allowed. Multiple meters or multiple DG facilities under one ownership at the same premises should not be permitted to prevent tariff arbitrage.
14	Regulation 14	Use of Adjacent Properties	In case of limited rooftop space, no additional DG capacity should be allowed using adjacent buildings, shared rooftops, or across streets/roads. The DG facility must remain confined to the same premises.

Sr. #	Regulation #	Summary Content	Comments / Recommendation
15	Regulation 21	Savings and Repeal	<p>All prosumers under repealed regulations should be transitioned to the 2025 Regulations, except for installed DG capacity. Billing based on National Average Energy Purchase Price should apply uniformly to all existing and future prosumers to avoid discrimination and ensure regulatory consistency.</p> <p>As fundamental of Regulations, a new Regulation, repealing the previous, becomes applicable on all existing and future applicable matters, except where change/ transition is entirely not possible.</p> <p>Reference Regulation 14(6) of the existing Regulations the Tariff once awarded to the Distributed Generator shall remain valid for a term of the Agreement/ Licence. Whereas, each of the massive increases in National Average Purchase Price since 2021 (i.e from Rs.9.95 to Rs.27 in 2024-25, currently Rs.25.98) were paid to all prosumers irrespective of their year of Agreement. The same principle should be adopted for a reverse situation.</p> <p>Reference to Grid Code should be replaced with Distribution Code, consistent with distribution-level interconnections.</p> <p>It is recommended to explicitly clarify that additional single-phase connections shall not be eligible for the premises where net-metering or net-billing arrangements exist. Allowing single-phase connections results in cross-subsidy leakage.</p>
16	Schedule I – Clause 3	Interconnection Disconnect Switch	
17	General	Single-phase connections	



Korangi Association of Trade & Industry

Muhammad Ikram Rajput
President

KATI/3-D/2025-19816
December 22, 2025

ایوان صنعت و تجارت کورنگی کراچی (پاکستان)

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Mr. Waseem Mukhtar
Chairman
National Electric Power Regulatory Authority (NEPRA)
NEPRA Tower
Attaturk Avenue (East), Sector G-5/1
Islamabad.

Subject: Humble request for notification of a clear cut-off date for net billing, for pending net metering applications with DISCOs

Respected Sir,

On behalf of the Korangi Association of Trade and Industry (KATI), we respectfully submit this request for NEPRA's kind consideration regarding the transition from the net metering framework to the net billing regime. This issue is being repeatedly raised by both residential consumers and industrial members, particularly those whose applications are currently pending at different stages of processing.

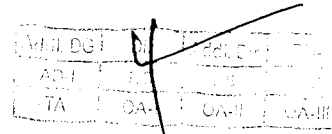
We understand that under the revised framework, existing net metering licence holders will continue to receive compensation for electricity exported to the grid at the national average power purchase price until the expiry of their licences, while new licence holders will be compensated at an energy-only rate. While we respect NEPRA's policy direction, we humbly submit that the absence of a clearly notified cut-off date has created uncertainty for consumers who have already installed solar systems and submitted applications in good faith.

It is important to highlight that a large number of net metering applications are presently pending with DISCOs and K-Electric and, in many cases, have not yet been forwarded to NEPRA for further processing. In practice, applications are only submitted after the installation of the system in accordance with prescribed technical standards. As a result, consumers have already incurred capital costs based on the regulatory framework prevailing at the time of installation. Delays in inspection, verification, and onward forwarding of applications are administrative in nature and are beyond the control of consumers.

NEPRA
Licensing Department
Utility No. 2151
Date: 30-12-2025

15775
29/12/25

Registrar



Dy No. 7321
Date: 23-12-25



In all fairness, consumers who have completed installations and submitted applications within time should not be disadvantaged due to procedural delays at the utility level. A clearly notified cut-off date will help ensure uniform treatment, avoid confusion across DISCOs, and provide consumers with clarity to make informed decisions regarding continuation under the new framework or modification of their system design, such as shifting to hybrid or storage-based solutions.

In view of the above, we humbly request NEPRA to kindly notify a clear cut-off date, and allow all applications submitted and pending with DISCOs or K-Electric up to that date, including those not yet forwarded to NEPRA, to be accommodated under the net billing framework with compensation at the national average power purchase price. This will help ensure that consumers are treated fairly and consistently.

We believe that such clarification will significantly reduce grievances, maintain consumer confidence, and support a smooth and orderly transition to the revised framework. KATI and its members remain fully supportive of NEPRA's efforts to strengthen the power sector and submit this request in a spirit of cooperation and constructive engagement.

We respectfully request your kind consideration of this matter.

Yours sincerely,

Muhammad Ikram Rajput
President
Cell: 0321-3082255

Copy to:

1. Sardar Awaiz Ahmad Khan Leghari, Federal Minister for Energy (Power Division).
2. Dr. Muhammad Fakhre Alam Irfan, Federal Secretary of Energy (Power Division).
3. Mr. Rehan Jawed, Chairman NEPRA & OGRA Standing Committee-KATI.



THE FEDERATION OF PAKISTAN
CHAMBERS OF COMMERCE & INDUSTRY
وفاق ایران هائے تجارت و صنعت - پاکستان

FPCCI-NEPRA/2025-3754
22nd December 2025

The Registrar,
National Electric Power Regulatory Authority (NEPRA),
Islamabad

Subject: Request for notification of cut-off date and protection of compensation mechanism for net metering applications filed prior to such date

Dear Sir,

At the outset, FPCCI respectfully submits that a large number of residential and industrial consumers have already installed net metering systems and filed their applications with DISCOs or K-Electric strictly in accordance with the regulatory framework prevailing at the time of investment. These applications, whether processed or still under administrative review, were submitted in good faith based on the then-applicable export compensation at the national average power purchase price. The notification of the net billing framework, in the absence of a clearly defined cut-off date, has created confusion and uncertainty regarding the treatment of such applications.

In all fairness and in accordance with the principles of natural justice, we respectfully request NEPRA to notify a clear and objectively verifiable cut-off date linked to the date of application submission. Further, FPCCI submits that all applications filed up to such notified cut-off date must be compensated for exported energy at the national average power purchase price, irrespective of whether they are processed before or after the announcement of the cut-off date. Until such cut-off date is formally notified, all net metering applications being filed and processed must continue to be treated under the existing compensation mechanism at the national average power purchase price. This approach ensures regulatory certainty, prevents retrospective application of policy changes, and guarantees uniform implementation across all DISCOs and K-Electric.

FPCCI respectfully request NEPRA's kind consideration and early issuance of an appropriate clarification or directive. **We will continue to highlight and submit further issues, if pointed out by the business community, to support a fair and orderly implementation of the regulatory framework.**

Very Best Regards,

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTRCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Brig Iftikhar Opel, SI (M), Retd
Secretary General

Copy to : - Honourable Minister for Energy (Power Division), Government of Pakistan
- The Secretary, Ministry of Energy (Power Division), Government of Pakistan

Addl. DG	Addl. Dir.	TA
AD-I	RO	PS
TA	OA-I	OA-II
		OA-III

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NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (NEPRA)



اب آپ ”نیپرا آسان اپروچ“، موبائل ایپلیکیشن کے ذریعے
بجلی کے متعلق کوئی بھی شکایت فوری درج کروا سکتے ہیں

NEPRA ASAAN APPROACH

بروقت بروقت

PUBLICATION OF DRAFT OF THE NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (PROSUMER) REGULATIONS, 2025 FOR ELICITING PUBLIC OPINION

In exercise of the powers conferred by section 47 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (XL of 1997) ("NEPRA Act"), the Authority is pleased to publish draft of the National Electric Power Regulatory Authority (Prosumer) Regulations, 2025 for eliciting public opinion thereon as required under section 47(3) of the NEPRA Act. These Regulations can be accessed through the NEPRA's official website under the "News" section. Comments may be sent to the Registrar (NEPRA) on the address given below within thirty (30) days of this publication.

Wasim Anwar Bhinder
Registrar NEPRA

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

Phone: 051-2013200 | Fax: 051-2600021

Email: registrar@nepra.org.pk

For further information, please visit: www.nepra.org.pk

From: Air Foundation School -G14 <airschoolg14@gmail.com>
Sent: Tuesday, December 23, 2025 12:58 PM
To: Registrar@nepra.org.pk
Subject: COMMENTS ON "NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (PROSUMER) REGULATIONS, 2025"

COMMENTS ON

"NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (PROSUMER) REGULATIONS, 2025"

NEPRA
 Licensing Department
 Entry No. 2121
 Date: 29-12-25

Definitions: (h) "billing cycle" means energy recorded by the meters in a period of thirty days;

Comment: The billing cycle should be based on a calendar month rather than a fixed 30-day period. If a 30-day billing cycle is applied, the meter reading date will continuously shift each month and result in a lag of approximately five days per year, since a calendar year has 365 days whereas twelve 30-day billing periods account for only 360 days.

6. Rights and obligations of the prosumer. — (2) The prosumer shall not have any right to utilize licensee's interconnection facilities for the sale of electricity to any other person.

Comment: What if a Prosumer opts supply of electricity to a person under CTBCM regime by using licensee's interconnection facility and pay use of system charges to the DISCO?

TERM OF AGREEMENT, TERMINATION OF AGREEMENT AND DISPUTE RESOLUTION

Comment: Nothing mentioned about "Dispute Resolution" in this section though title of section contains it. Some mechanism is given under Clause 17 and not under this section.

7. Term of agreement and conditions. — (1) The term of the agreement between prosumer and licensee shall be five years with effect from date of commissioning of distributed generation facility.

At the expiry of the initial term, the agreement may be renewed between the prosumer and the licensee for another term of five years and so on with mutual consent of the licensee and prosumer.

Comment: Under new regulation, the pay back period will be increased for a plant. So, first agreement period should remain of 7 years and any subsequent renewal may be for 5 years each.

Moreover, some suitable mechanism may also be provided here for Prosumers who already have completed their first 7 years term and their licenses have expired.

12. Responsibility for costs of interconnecting a distributed generation facility. — (1) Prosumer shall be responsible for all costs associated with interconnection facilities up to the interconnection point including metering installation.

Comment: If the electricity meter is functioning properly and the licensee (the utility company) requires its replacement for their own operational or regulatory reasons, then the cost of replacement must be borne by the

good
Comments

Addl. DG	Dir	Addl. Dir	DD-1
AD-1	NO	PS	E/S
TA	OA-I	OA-II	OA-III

Forwarded please

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTBCM)

For kind information, please,

✓ 1. Chairman 2. M (Tech)
 ✓ 3. M (Law) 4. M (Dev)

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 24/12/25

licensee, not the consumer. Consumers are only responsible for costs when the meter is defective due to their own fault or tampering. This aspect should be mentioned in the Regulations.

14. Billing.— (1) At the end of each billing cycle, following the date of interconnection of distributed generation facility to its distribution system, the licensee shall raise its bill after taking into account the electricity generated and consumed by the prosumer under a **net billing** arrangement as follows:

(a) the kWh supplied by licensee to prosumer, shall be billed in accordance with the applicable tariff.

(b) the kWh supplied by prosumer to the licensee, shall be billed in accordance with the national average energy purchase price.

Comment: *When a prosumer will be billed for energy consumed, certainly, it will have to pay all applicable taxes in the bill for energy consumed. Since, two separate streams of sale and purchase of electricity are being proposed, so there is likelihood that prosumers may have to pay sales tax too for energy supplied to the licensee. This aspect needs to clearly cater for in the Regulation.*

14. Billing.— (1) (b) the kWh supplied by prosumer to the licensee, shall be billed in accordance with the national average energy purchase price.

Comments: *the regulation should clearly specify which period's national average energy purchase price applies, because the financial impact can vary significantly depending on whether it's calculated monthly, quarterly, or annually.*

14. Billing.— (3) The Authority may revise the rate provided in sub-regulation (1) during the subsistence of the agreement and the rate so revised shall be deemed incorporated in the agreement.

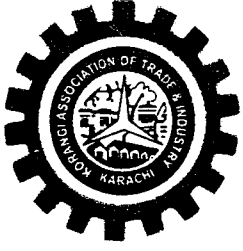
Comments: *This clause will create uncertainty regarding the applicable rates, and the retrospective application of revised rates would be unjustified.*

21. Savings and Repeal.— (1) The National Electric Power Regulatory Authority (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015 shall stand repealed upon coming into force of these regulations.

(2) Notwithstanding the repeal effected by these regulations, nothing shall affect or be deemed to affect, the licence issued and agreement executed under the repealed regulations before commencement of these regulations except the billing shall be in accordance with regulation 14 commencing from the billing cycle subsequent to the month in which these regulations come into effect;

Provided that distributed generators having the valid agreements executed under the repealed regulations, shall be billed in accordance with the national average power purchase price till the expiry of the term of their agreement and thereafter shall be billed in accordance with the national average energy purchase price for all future renewals.

Comment: *The above arrangement clearly shows that all existing Solar generators are being shifted to new regime of net billing except with the difference that they will be paid national average **Capacity** purchase price instead of national average **Energy** purchase price. This retrospective revision seems unjustified.*



Korangi Association of Trade & Industry

ایوان صنعت و تجارت کورنگی کراچی (پاکستان)

Muhammad Ikram Rajput

President

KATI/3-D/2025-19817
December 22, 2025

Mr. Waseem Anwar Bhinder
Registrar
National Electric Power Regulatory Authority (NEPRA)
NEPRA Tower
Attaturk Avenue (East), Sector G-5/1
Islamabad.

Forwarded please:

☒ For one action ☐ For information

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For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

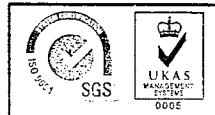
Subject: Humble request for notification of a clear cut-off date for net billing, for pending net metering applications with DISCOs

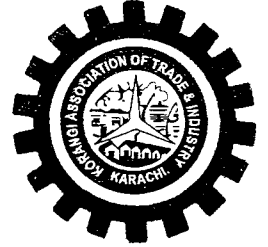
Respected Sir,

On behalf of the Korangi Association of Trade and Industry (KATI), we respectfully submit this request for NEPRA's kind consideration regarding the transition from the net metering framework to the net billing regime. This issue is being repeatedly raised by both residential consumers and industrial members, particularly those whose applications are currently pending at different stages of processing.

We understand that under the revised framework, existing net metering licence holders will continue to receive compensation for electricity exported to the grid at the national average power purchase price until the expiry of their licences, while new licence holders will be compensated at an energy-only rate. While we respect NEPRA's policy direction, we humbly submit that the absence of a clearly notified cut-off date has created uncertainty for consumers who have already installed solar systems and submitted applications in good faith.

It is important to highlight that a large number of net metering applications are presently pending with DISCOs and K-Electric and, in many cases, have not yet been forwarded to NEPRA for further processing. In practice, applications are only submitted after the installation of the system in accordance with prescribed technical standards. As a result, consumers have already incurred capital costs based on the regulatory framework prevailing at the time of installation. Delays in inspection, verification, and onward forwarding of applications are administrative in nature and are beyond the control of consumers.





In all fairness, consumers who have completed installations and submitted applications within time should not be disadvantaged due to procedural delays at the utility level. A clearly notified cut-off date will help ensure uniform treatment, avoid confusion across DISCOs, and provide consumers with clarity to make informed decisions regarding continuation under the new framework or modification of their system design, such as shifting to hybrid or storage-based solutions.

In view of the above, we humbly request NEPRA to kindly notify a clear cut-off date, and allow all applications submitted and pending with DISCOs or K-Electric up to that date, including those not yet forwarded to NEPRA, to be accommodated under the net billing framework with compensation at the national average power purchase price. This will help ensure that consumers are treated fairly and consistently.

We believe that such clarification will significantly reduce grievances, maintain consumer confidence, and support a smooth and orderly transition to the revised framework. KATI and its members remain fully supportive of NEPRA's efforts to strengthen the power sector and submit this request in a spirit of cooperation and constructive engagement.

We respectfully request your kind consideration of this matter.

Yours sincerely,

Muhammad Ikram Rajput
President
Cell: 0321-3082255

Copy to:

1. Sardar Awais Ahmad Khan Leghari, Federal Minister for Energy (Power Division).
2. Dr. Muhammad Fakhre Alam Irfan, Federal Secretary of Energy (Power Division).
3. Mr. Rehan Jawed, Chairman NEPRA & OGRA Standing Committee-KATI.

Very important & pertinent comments



Capi

CLIMATE ACTION AND
POLICY INITIATIVE

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad, Pakistan

N/M.
Prosumer
Regulation

Subject: Submission of Proposed Amendments to draft NEPRA (Prosumer) Regulations, 2025 for Alignment with Pakistan's NDC, Grid Modernization, and Climate Finance Enablement

Respected Sir/Madam,

I respectfully submit herewith a comprehensive proposal for amendments to the draft NEPRA (Prosumer) Regulations, 2025, for consideration by the Authority. The proposed amendments are aimed at strengthening the existing draft regulatory framework uploaded by NEPRA for seeking comments to:

- align distributed generation and prosumer participation with Pakistan's Nationally Determined Contribution (NDC) under the UNFCCC and Paris Agreement;
- enable measurable, reportable, and verifiable (MRV) emissions reductions from the power sector;
- support grid stability, resilience, and modernization through smart inverters, energy storage, AMI, digital control centres, and virtual power plants;
- unlock climate finance, results-based finance, and carbon market opportunities to enhance commercial viability for licensees and prosumers; and
- protect investor confidence through transparent tariff degression and grandfathering provisions.

This submission includes:

1. an Explanatory Memorandum;
2. a Statement of Objects and Reasons;
3. an Executive Policy Brief including indicative tCO₂e reduction and revenue potential;
4. a critical review of the draft regulations
5. a comprehensive comparative analysis table identifying gaps and proposed improvements; and
6. a draft of recommendations prepared in formal regulatory language.

The submission is made in good faith to support NEPRA's mandate of ensuring a secure, affordable, efficient, and sustainable power sector for Pakistan.

In view of the foregoing, it is respectfully prayed that the Authority may be pleased to take this submission on record and consider this submission for further regulatory processing while finalizing the draft NEPRA Prosumer Regulations, 2025.

Yours sincerely,

Dr. Irfan Yousuf
CEO
Climate Action and Policy Initiative
+92-300-5220122

19/12/2025

Forwarded please:

☒ For action ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTRCM)

For kind information, please.

1. Chairman
2. M (Tech)
3. M (Law)
4. M (Dev)

REGISTRAR OFFICE
Date: 23.12.25
Page No: 14924

Climate Action And Policy Initiative

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EXPLANATORY MEMORANDUM

1. Background

Pakistan's power sector is a central pillar of national mitigation efforts under its NDC. Distributed renewable generation by prosumers represents a rapidly growing segment with high mitigation potential, yet the existing regulatory framework remains largely limited to net billing mechanics, without enabling:

- emissions accounting;
- active grid management;
- aggregation and virtual power plants;
- or monetization of climate benefits.

2. Need for Amendments

The existing Prosumer Regulations:

- do not require emissions data recording or MRV;
- do not define ownership or use of emissions reductions;
- restrict third-party sale and aggregation, limiting scale;
- rely on legacy metering and technical standards;
- do not encourage licensees to leverage climate finance or carbon markets.

These gaps constrain both grid modernization and investment mobilization.

3. Approach Adopted

The proposed amendments:

- integrate NDC and Paris Agreement alignment directly into regulatory objectives;
- introduce smart grid requirements (AMI, smart inverters, telemetry, storage);
- enable VPPs, aggregators, and digital control centres;
- establish MRV and carbon asset frameworks; and
- maintain consumer and investor safeguards through predictable tariff rules.

STATEMENT OF OBJECTS AND REASONS

Objects

The primary objects of the proposed amendments are to:

1. mainstream distributed renewable energy into Pakistan's national decarbonization pathway;
2. ensure grid safety, stability, and efficiency in a high-DER environment;
3. create regulatory certainty for private investment;
4. balance investor certainty and consumer protection with regulatory flexibility, by enabling the Authority to adapt tariff structures to evolving market conditions without imposing predetermined degression schedules.
5. unlock climate finance and carbon market revenues for the power sector; and
6. support NEPRA's statutory mandate of sustainable and affordable electricity.

Reasons

These amendments are necessitated by:

- Pakistan's enhanced NDC ambition;
- declining renewable and storage technology costs;
- increasing stress on distribution networks;
- international best practices in DER integration; and
- the need to reduce fiscal and tariff pressure through non-tariff revenue streams.

EXECUTIVE POLICY BRIEF

A. Strategic Importance

Prosumers are no longer passive consumers; globally they are:

- providers of clean energy,
- contributors to grid services, and
- generators of carbon-mitigation value.

Pakistan can leverage this segment to meet NDC targets at lower system cost.

B. Indicative Mitigation Potential (Illustrative)

Parameter	Conservative Scenario
Additional prosumer capacity by 2030	5,000 MW
Average capacity factor	18%
Annual clean generation	7.9 TWh
Grid emission factor (indicative)	0.55 tCO ₂ e/MWh
Annual emissions reduction	4.3 million tCO₂e

C. Revenue Potential (Carbon Markets)

Carbon price (USD/tCO ₂ e)	Annual revenue (USD)
USD 5	21 million
USD 10	43 million
USD 20	86 million

These revenues could be used to:

- retain tariff flexibility by empowering the Authority to adjust export purchase tariffs in response to market evolution, technology cost trends, and demand-side participation, while avoiding rigid degression mechanisms that could undermine consumer viability.;
- finance AMI, storage, and grid upgrades;
- support low-income prosumers; and
- improve DISCO's financial sustainability.

CRITICAL REVIEW OF THE DRAFT NEPRA PROSUMERS REGULATIONS, 2025

A. High-impact observations (what will break / what will scale)

1) The Regulations are still “net-billing paperwork + basic protection”—not a modern DER/grid-integration framework

They allow DG and set billing at the “national average energy purchase price” for exports NEPRA Prosumer Regulations 2025, but do not create a technical/market architecture for:

- active network management (DERMS, telemetry, dispatch, curtailment rules, cyber/security),
- ancillary services (Volt/VAR, frequency response, ramp control),
- aggregation (Virtual Power Plants, Virtual Microgrids),
- storage-linked compliance (ramp-rate limits, smoothing, peak export caps),
- settlement-grade AMI.

This will cause: higher interconnection friction, “ad-hoc” DISCO practices, disputes, and slower investment.

2) Several clauses unintentionally restrict market development and investor confidence

- Third-party sale is barred outright (“shall not have any right... sale of electricity to any other person”). That blocks wheeling-like commercial structures, private offtakers, aggregation models, and many VPP business cases.

• A hard operational gate is introduced: no application if DG on a transformer hits “80% of its rated capacity”, but without method, data transparency, queue management, hosting capacity publication, or upgrade options, invites non-uniform implementation and rent-seeking behavior.

3) Definitions/coverage are inconsistent and incomplete

- DG is defined as only solar, wind, and biogas, but Schedule I explicitly mentions “DG facility or energy storage device”. That’s an internal inconsistency and also a missed opportunity: storage should be formalized as a first-class resource.
- Hydro is not eligible under the DG definition, despite being a practical distributed resource (micro/mini-hydro).
- Biomass/Waste to energy is also not eligible under the DG definition, despite being a practical distributed resource

4) Regulations meant for connection at the distribution level, however, these refer to the Grid Code only, and do not refer to the Distribution Code

- Grid code is inserted in the regulations, seemingly, with a view to better power planning and generation capacity expansion planning. Since the interconnection under these regulations is envisaged at the 11 kV level and below, it is crucial to integrate the distribution code as well.

5) Metering and data approach is outdated for a prosumer-heavy grid

Meter reading is “preferably through HHU” and metering can be one bidirectional meter OR two meters. This is not compatible with:

- scalable settlement,
- interval data & time-sync requirements,

- VPP operations,
- fraud detection at scale,
- performance-based tariffs and network services.

B. Key additional recommendations

1) Prosumer-side: modern plant/equipment + grid services

Current standards mention UL 1741 and IEEE 1547 (2003) but do not require “smart inverter functions,” telemetry, remote limiting, ramp control, or storage readiness. There is a need to add explicit requirements:

- **Smart inverter** functions: Volt/VAR, Volt/Watt, frequency-watt droop, ride-through, soft-start/ramp-rate limits.
- **Communications protocol**: define minimum telemetry + command signals and an open protocol (vendor-neutral), with cybersecurity requirements.
- **Battery/storage requirement (conditional, not blanket)**: mandate storage or export-limiting where hosting capacity is constrained or where flicker/ramp issues are expected; allow compliance via (i) BESS, (ii) inverter export cap, (iii) controlled curtailment, (iv) hybrid scheme.
- **Grid support obligation** (with safeguards): prosumer facility shall be available for system stability services when needed, but only under transparent conditions (limits, compensation mechanism, and dispute pathway).

2) Licensee-side: AMI-only + DER control centre / DERMS

Replace HHU preference with:

- AMI meters only (interval, time-synced, remote read, remote connect/disconnect where allowed, tamper events, event logs).
- A dedicated data control centre (DERMS-like) to ingest prosumer telemetry, record data, run validation, forecast, and issue operational commands (curtailment/export caps) with audit logs.

3) Market design: allow third-party sale with DNO arrangements

At the onset, the regulations define the licensee as “shall mean an entity holding a distribution license and a supplier license under the Act.” This does not prohibit a competitive supplier do not own the distribution/interconnection facilities from signing an agreement with a prosumer for the supply of electricity. At the same time, Regulation 6(2) prohibits that “The prosumer shall not have any right to utilize licensee's interconnection facilities for the sale of electricity to any other person.” This also prohibits innovation and the emergence of new business models. It would be more prudent to replace the blanket prohibition with a structured permission:

- Third-party sale is allowed provided the third party has “adequate legal arrangements” with the distribution network operator for evacuation, metering, settlement, imbalance, and loss allocation (and compliance with grid/security rules) and is a license holder of the Authority for providing the electricity services, i.e. supplier, trader, aggregator, ancillary services provider, etc. This is essential for bankability, competition, and innovation.

4) VPP / Virtual microgrids

Introduce:

- recognition of aggregators,
- rules for aggregation registration,
- dispatch/curtailment hierarchy,

- data access (consent-based),
- baseline and settlement rules (including AI-enabled verification, anomaly detection, and anti-fraud).

5) Tariff transition

1. **Degression/Adjustments for new entrants:** export purchase price reduces/adjusts each year for those who connect starting Jan 01 of the next year by a specific percentage (to be determined by the Authority) keeping in view the power market situation (a clear investment signal + cost-reflective transition).
2. **Grandfathering for applicants:** all consumers who applied to licensees before 31 Dec of a year keep the tariff basis of that year (investor safety/fairness).
3. **Sale to third-party licensees:** prosumers may be allowed to sell electricity to the third-party licensees, including electricity suppliers or traders at a rate duly agreed among them, giving an opportunity to participate in the power market.

These can be inserted as sub-clauses within billing/tariff provisions under Regulation 14, which currently sets export credit at the national average energy purchase price and permits revisions

6) Likage with NDC & carbon-market linkage is essential (policy rationale)

Pakistan's updated NDC commits to significant mitigation in the power sector, largely conditional on international climate finance and carbon markets. Distributed generation and prosumers are:

- measurable, verifiable, and scalable mitigation assets,
- capable of producing real, additional, and traceable emissions reductions, and
- ideal candidates for Article 6.2 / 6.4, voluntary carbon markets, results-based climate finance, and green financing instruments.

Yet, the current Regulations:

- do not require emissions data recording,
- do not define ownership of emissions reductions, and
- do not enable licensees or aggregators to monetize mitigation value.

This is a missed opportunity to lower tariffs, improve DISCO finances, and meet NDC targets simultaneously.

Comparative table of improvements (with contradictions/confusions highlighted)

Captions adjusted slightly to make the table more usable.

Regulation / Section	Clause	Current statement (summary)	Issues / weaknesses / confusion / contradiction	Explanation for addressal	Recommended clause(s) (draft-ready)
Objectives (missing)	—	No explicit objective section	No linkage to NDC, decarbonization, Paris Agreement	Regulations should explicitly align with national & international climate commitments	Insert new Regulation 1A – Objectives linking prosumers to NDC mitigation, Paris Agreement, clean energy transition
Definitions	2(i), 2(i)	DG facility/resource limited to solar/wind/biogas up to 1 MW NEPRA Prosumer Regulations 2025	Excludes hydro, biomass, waste to energy, and doesn't define storage though later text references it; constrains viable local resources. No emissions or carbon definitions	Expand eligible technologies and formally define storage & hybrid systems. Weak foundation for MRV and climate finance	"Distributed generation facility means a facility using solar, wind, biogas, biomass/waste-to-energy, and hydro (including micro/mini-hydro), and may be hybridized with energy storage... up to 1 MW." Add definitions for emissions reductions, carbon assets, aggregator, DERMS, virtual power plant
Agreement template inconsistency	Schedule-1 (Recital B)	Mentions "DG facility or energy storage device..."	Contradiction with DG definition that omits storage	Harmonize the legal scope to avoid disputes. Further, Legal ambiguity affects carbon ownership	Add definition: "Energy storage system (ESS)..." and explicitly allow DG+ESS interconnection and settlement treatment. Harmonize the emissions ownership.
Eligibility / sizing	3(2)	Capacity ≤ sanctioned load	May block economically optimal	Replace with feeder/transformer	"Capacity may exceed sanctioned load subject to

			designs and VPP value; not aligned with hosting-capacity based planning	hosting capacity + export caps instead of crude sanctioned-load cap	hosting capacity, export limitation, and protection/telemetry compliance."
Grid hosting capacity gate	3(5) proviso	No application if DG on transformer reaches 80%	Opaque and arbitrary; discourages clean energy, no method, queue, upgrade option; invites arbitrary refusals	Require DISCOs to publish hosting capacity and offer upgrade/cost-sharing pathways NDC requires planned upgrades, not caps	"Licensee shall publish transformer/feeder hosting capacity monthly; applications processed by queue, where exceeded, licensee shall offer (i) export limit, (ii) storage/ramp compliance, (iii) network upgrade estimate and timeline."
					Also, require hosting capacity maps & upgrade pathways
Licensee discretion	5(2)	Licensee may disconnect "with or without notice" on fault	Too broad, no event logging, restoration SLA, or due process	Add operational governance and auditability	"All disconnections shall be logged with timestamp, reason code, and restoration steps; prosumer notified within X hours except emergencies; restoration SLA."
Third-party sale ban	6(2)	Prosumers cannot use interconnection to sell to "any other person" NEPRA Prosumer Regulations 2025	Kills private off-takers, corporate PPAs, aggregation, VPPs, article 6 aggregation, innovation; reduces competition and bankability	Allow third-party sale with DNO legal/technical arrangements. Carbon markets require aggregation	Replace with: "Third-party sale is permitted subject to DNO-approved wheeling/evacuation agreement, metering, settlement, losses, and compliance with

					dispatch/curtailment and cyber requirements.”
Technical standards	9(5)	UL 1741, IEEE 1547:2003, IEC 61215 etc	2003-era baseline; no mandatory smart-inverter functions/telemetry No emissions monitoring or smart functionality	Require smart inverter functions and update references via “latest version” wording Grid services reduce fossil dispatch	“Inverters shall be smart inverters with Volt/VAR, Volt/Watt, freq-watt, ride-through, ramp-rate controls; compliance with latest IEEE/IEC standards as adopted by Authority.” Mandate smart inverters + telemetry
Communication/telemetry (missing)	—	Not specified (only “interference” mention)	No protocol; cannot build DERMS/VPP, grid stability risk	Add minimum telemetry + protocol + cybersecurity	“Prosumers \geq X kW shall provide real-time/near-real-time telemetry (P, Q, V, f, breaker status, export cap) and accept secure control signals via approved protocol; cyber controls mandatory.”
Storage requirement (missing)	—	Not defined; only implicit in Schedule-I mention	Without storage/export-limits, spikes and reverse power flow become DISCO justification to block	Make storage/export cap a compliance option	“Where hosting capacity is constrained, prosumer shall comply via (i) ESS, (ii) export limiting, (iii) ramp-rate control, or (iv) dispatchable curtailment under DERMS.”
Voltage & frequency	11	Voltage/frequency limits only ($\pm 5\%$ voltage; $\pm 1\%$ frequency)	Over-simplified; no ride-through curves, flicker/harmonics, fault ride-through. No active grid support	Move detailed power-quality requirements to an annexed “Interconnection Code”	“Authority shall notify a Prosumer Interconnection Code with harmonics, flicker, unbalance, protection settings, ride-through curves, and compliance testing.”

				Grid support avoids peaking fossil plants	Require Volt/VAR, freq-watt, ride-through
Metering approach	13(3)	Meter reading preferably via HHU	Not scalable; weak auditability; limits innovation No interval data, no MRV	Require AMI-only and interval data MRV is mandatory for carbon finance	"All prosumers shall be served on AMI (interval) metering with remote reading and event logs; HHU allowed only as temporary fallback with written justification."
Two-meter option	5(1)(a), 13(1)	One bidirectional meter or two meters	Two-meter option can create settlement confusion, gaming, and higher O&M	Standardize to AMI net meter (or AMI import/export channels)	"Metering shall be via AMI capable of recording import/export in separate registers; two-meter allowed only for legacy transition."
Data control centre (missing)	—	Not required	DISCOs lack a mandated operational & settlement backbone No emissions accounting	Require a dedicated DER data control centre / DERMS functions NDC tracking requires central data	"Each licensee shall establish a DER Data Control Centre to (i) ingest AMI + telemetry, (ii) validate data, (iii) forecast DER output, (iv) issue export caps/curtailment, (v) maintain auditable logs."
Billing basis	14(1)(b)	Export credited at national average energy purchase price	No time granularity; no degression rule; uncertainty for investors if Authority revises mid-term No provision for prosumers to sale electricity to third party licensees. No climate value recognized.	Add predictable transition + grandfathering + transparency Allow third party sale of electricity Carbon revenues can reduce tariffs	Add: (i) annual degression/adjustment for new connections from Jan 01 next year, (ii) grandfathering for applicants before Dec 31; (iii) published methodology and notice period Allow sale of electricity to third party licensees at the mutually agreed tariff rate.

					Allow climate finance/carbon revenues to offset tariffs
Tariff revisions	14(3)	Authority may revise price	Investor uncertainty	NDC needs private capital	Authority-led tariff adjustment based on market and demand-side conditions
"Power" vs "Energy" purchase price	21(2) proviso	Uses "national average power purchase price" then "energy purchase price"	Terminology inconsistency creates litigation risk Legal inconsistency	Standardize definitions and terms Carbon contracts require clarity	Define "National Average Energy Purchase Price (NAEPP)" once; replace inconsistent term everywhere
Consumer protection / fairness (missing)	—	No explicit grandfathering for application date	Investors face cliff risk around year-end and tariff revisions	Add clear cut-off rule and notification	"Applicants who submitted complete applications by 31 Dec shall be settled under that year's export price basis."
Emissions accounting (missing)	—	No requirement	No MRV, no carbon markets	Critical gap	Insert mandatory emissions recording & reporting
Carbon ownership (missing)	—	Silent	Disputes inevitable	Article 6 requires clarity	Define emissions reduction ownership
Licensee role (missing)	—	Passive	Missed revenue & NDC role	DISCOs can monetize mitigation	Encourage licensees to explore climate finance
Aggregation / VPP / virtual microgrids (missing)	—	Not provided	Blocks VPP, demand response stacking, resilience microgrids No scaling	Add "Aggregator" category + operating rules NDC requires scale	"Authority may register Aggregators; prosumers may participate in VPP/virtual microgrids; settlement, data consent, dispatch priority, and curtailment rules shall apply."
AI / blockchain / innovation enablement (missing)	—	Not covered	No framework for digital MRV, automated settlement, anti-fraud	AI lowers transaction costs	"Licensee may deploy AI for forecasting/anomaly detection; Authority may approve DLT/blockchain for

			Manual MRV costly	Add enabling + governance language	settlement audit trails subject to privacy/cyber rules.”
Dispute handling	17	Disputes submitted to Authority NEPRA Prosumer Regulations 2025	No defined escalation timeline; no interim operational rule	Add staged resolution and interim operations	“Escalation: Licensee, Ombud/committee, Authority; interim operating condition remains in force unless safety risk.”
Reporting to govt	—	None	Fragmented climate data	UNFCCC reporting needs data	Require reporting to federal NDC registry

DRAFT INSERTIONS IN THE NEPRA (PROSUMER) REGULATIONS (AMENDMENT), 2025

NATIONAL ELECTRIC POWER REGULATORY AUTHORITY NOTIFICATION

Islamabad, the ____ day of _____, 2025

S.R.O. No. ____/2025

In exercise of the powers conferred by section 7 read with section 31 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (XL of 1997), the National Electric Power Regulatory Authority hereby makes the following amendments in the National Electric Power Regulatory Authority (Alternative & Renewable Energy Distributed Generation and Net Metering) Regulations, 2015, as amended and notified as the NEPRA (Prosumer) Regulations, 2025, namely:

1. Short title and commencement

1. These Regulations may be called the NEPRA (Prosumer) Regulations (Amendment), 2025.
2. They shall come into force at once.

2. Insertion of new Regulation 1A (Objectives)

After Regulation 1, the following new regulation shall be inserted, namely:

“1A.

Objectives.

These Regulations aim to—

- (a) promote distributed renewable energy generation in alignment with Pakistan’s Nationally Determined Contribution (NDC) under the United Nations Framework Convention on Climate Change and the Paris Agreement;
- (b) support decarbonization of the power sector through measurable and verifiable greenhouse gas emissions reductions;
- (c) facilitate participation of prosumers and licensees in climate finance, carbon markets, and results-based financing mechanisms; and
- (d) enhance grid resilience, efficiency, and affordability through smart grid technologies, energy storage, digitalization, and innovation.”

3. Amendments to Regulation 2 (Definitions)

In Regulation 2, after clause (i), the following clauses shall be inserted:

- “(ia) ‘Distributed Generation Facility’ means a facility installed by a prosumer using solar, wind, biogas, biomass/waste to energy, hydro, including micro and mini-hydro, or hybrid configurations, and may include an energy storage system, with a capacity not exceeding one megawatt.
- (ib) ‘Energy Storage System (ESS)’ means a system capable of storing electrical energy and delivering it at a later time for grid stability, optimization, or reliability.
- (ic) ‘Emissions Reductions’ means quantified and verified reductions in greenhouse gas emissions attributable to electricity generated by a prosumer facility displacing fossil fuel-based generation.
- (id) ‘Carbon Asset’ means any emissions reduction unit, credit, certificate, or outcome eligible under voluntary or compliance carbon market mechanisms, including Article 6 of the Paris Agreement.
- (ie) ‘Aggregator’ means an entity authorized by the Authority to aggregate multiple prosumer facilities for electricity dispatch, grid services, emissions accounting, or market participation.

(if) ‘Virtual Power Plant (VPP)’ means a digitally aggregated portfolio of distributed energy resources operated as a single functional entity.

(ig) ‘DER Data Control Centre’ means a system established by a licensee for data acquisition, validation, forecasting, control, and settlement of distributed energy resources.”

(ih) “NDC Registry” means the national system designated for tracking mitigation outcomes and international transfers.

(ij) “Distribution Code means the code prepared by the licensee and approved by the Authority

4. Amendment to Regulation 3 (Eligibility and Capacity)

In Regulation 3, sub-regulation (2) shall be substituted as follows:

“(2) The installed capacity of a distributed generation facility may exceed the sanctioned load of the prosumer, subject to compliance with transformer and feeder hosting capacity, export limits, grid safety requirements, and conditions specified by the licensee and approved by the Authority.”

In Regulation 3, a new sub-regulation (12) shall be inserted as follows:

“(12) The licensees shall establish and maintain an end-to-end online application system for processing applications for interconnection of distributed generation facilities, utilizing modern digital technologies and industry-recognized best practices.

Provided that the Authority may issue guidelines, technical specifications, and timelines for development, interoperability, cybersecurity, and operation of the online application system.

The said online application system shall be integrated with the process of grant of concurrence by the Authority under regulation 4, and shall enable electronic submission, processing, tracking, and record-keeping of all applications and related approvals.

The online application system shall provide appropriate access and visibility, as determined by the Authority, to the applicants, the licensees, the Authority, and the Federal Government for purposes of transparency, monitoring, and regulatory oversight.”

Explanation.— All applicants shall submit applications, along with complete documentation required for the interconnection of a distributed generation facility to the distribution system of a licensee, including the application for grant of concurrence by the Authority, exclusively through the online application system developed and maintained by the licensee in accordance with these Regulations.”

5. Amendment to Regulation 3(5) (Transformer Capacity)

In Regulation 3, sub-regulation (5) shall be substituted as follows:

“(5) The licensee shall assess applications based on published transformer and feeder hosting capacity.

Provided that where hosting capacity is constrained, the licensee shall offer options including export limiting, installation of energy storage systems, controlled curtailment, or network upgrades, as approved by the Authority.”

6. Substitution of Regulation 6(2) (Third-Party Sale)

Regulation 6(2) shall be substituted as follows:

“(2) A prosumer may sell electricity to a third-party licensee at a mutually agreed tariff rate, provided that adequate legal, technical, metering, settlement, loss allocation, and grid security

arrangements have been executed with the distribution network operator and approved by the Authority.”

A new clause 6(3) may be inserted as follows:

“(3) A prosumer may sell associated environmental attributes to a third party, subject to execution of legal and technical arrangements, compliance with relevant policies, and in alignment with national carbon market and NDC accounting frameworks.”

7. Insertion of new Regulation 9A (Smart Inverters, Communications, Storage)

After Regulation 9, the following new regulation shall be inserted:

“9A. Smart Grid Compliance.

(1) Prosumers shall install smart inverters capable of voltage regulation, frequency response, ramp-rate control, ride-through, and remote export limiting, in accordance with standards notified by the Authority.

(2) Prosumers above a capacity threshold specified by the Authority shall provide real-time or near-real-time telemetry and communication capability to the licensee using approved protocols.

(3) Where required for grid stability or power quality, compliance may be achieved through energy storage systems, export limiting, ramp-rate control, or controlled curtailment.”

8. Amendment to Regulation 13 (Metering)

In Regulation 13, sub-regulation (3) shall be omitted and substituted as follows:

“(3) All prosumers shall be served through Advanced Metering Infrastructure (AMI) meters capable of interval-based measurement of import and export of electricity, event logging, and remote data acquisition.”

9. Insertion of new Regulations 13A, 13B and 13C

After Regulation 13, the following new regulations shall be inserted:

“13A. Data Management.

(1) Each licensee shall establish a DER Data Control Centre for collection, validation, forecasting, settlement, and operational control of prosumer data.

13B. Emissions Measurement, Reporting and Verification.

(1) Licensees shall calculate emissions reductions attributable to prosumer generation using grid emission factors notified by the Authority or Federal Government.

(2) Such data shall be maintained in auditable digital form and made available for national NDC tracking and carbon market participation.

13C. Ownership and Transfer of Emissions Reductions.

(1) Unless otherwise agreed, emissions reductions shall vest with the prosumer.

(2) Prosumers may authorize licensees or aggregators to bundle, monetize, or transfer emissions reductions in accordance with national authorization procedures.”

10. Amendment to Regulation 14 (Billing and Tariff)

After Regulation 14(3), the following sub-regulations shall be inserted:

(4) The export of electricity by a prosumer to the distribution system of a licensee shall be credited at the tariff determined by the Authority in accordance with these Regulations.

(5) Provided that the Authority may, from time to time, **review, adjust or revise** the applicable export purchase tariff, in whole or in part, having regard to—

- (a) prevailing market conditions;
- (b) cost trends of distributed generation technologies;
- (c) grid integration and system stability requirements; and
- (d) the objective of encouraging efficient demand-side participation and sustainable deployment of distributed energy resources.

(6) Provided further that prosumers who submit complete applications on or before the 31st day of December of a calendar year shall be entitled to the export purchase tariff applicable for that year, irrespective of the date of interconnection, unless otherwise expressly notified by the Authority.

(7) Without prejudice to the foregoing, a prosumer may sell electricity to third-party licensees, including electricity suppliers or electricity traders, at a mutually agreed tariff, subject to—

- (a) execution of necessary commercial, metering, settlement, and grid usage arrangements with the relevant distribution network operator; and
- (b) compliance with applicable laws, rules, and regulations as determined by the Authority.”

11. Insertion of new Regulation 14A (Climate Finance and Carbon Markets)

After Regulation 14, the following new regulation shall be inserted:

“14A. Climate Finance Facilitation.

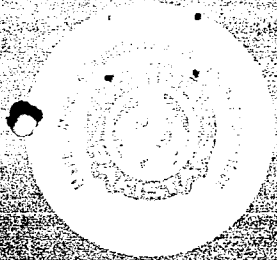
- (1) Licensees are encouraged to explore climate finance, results-based financing, and carbon market mechanisms to enhance the commercial viability of prosumer participation.
- (2) Revenues generated may be utilized to reduce consumer tariffs, finance grid upgrades, deploy AMI and energy storage systems, and support vulnerable consumers.”

12. Insertion of new Regulation 18A (Digital Innovation)

After Regulation 18, the following new regulation shall be inserted:

“18A. Digital Innovation.

The Authority and licensees may deploy artificial intelligence, digital platforms, and distributed ledger technologies for forecasting, settlement, emissions accounting, and auditability, subject to data privacy and cybersecurity requirements.”



Marble Mines Industries Development Association

Forwarded please	
<input checked="" type="checkbox"/> For decision	<input checked="" type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic)	<input type="checkbox"/> DG (Admin)
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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (Admin)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dir)

Registrar

Date: 17/12/2025

Ref No : MMIDA00115

To,
Chairman NEPA

Subject: COMPLAINT AGAINST STOPPING OF PROCESSING OF NET METERING APPLICATIONS

Addl. DG	AD-I	RO	PS	E/S
TA	OA-I	OA-II	OA-III	

14864
19.12.25

Dear Sir

I am writing to bring to your attention a matter of great concern regarding the sudden halt in processing net metering applications by PESCO and TESCO. On December 16, 2025, the Chief executive Officer (CEO) of PESCO and the General Manager (Technical) of TESCO issued a directive to all circles, instructing them to cease processing new net metering applications until further notice.

This decision has been taken at a time when NEPA is in the process of amending the Net Metering Regulations, 2015, and has invited comments from stakeholders until January 11, 2026. The new regulations, known as NEPA Prosumer Regulations, 2025, are expected to be finalized within the next 2-3 months.

In light of the above, it is unfair and unjust to halt the processing of net metering applications, as it will cause undue hardship to consumers who have already invested in solar systems and are awaiting approval. Many consumers have submitted their applications, which are currently pending at various stages, including circle level, planning, and NEPA.

I respectfully request that the CEO of TESCO and CEO of PESCO be directed to continue processing net metering applications in accordance with the existing policy, until the new regulations come into effect. This will ensure that consumers are not unfairly disadvantaged and can continue to benefit from the existing net metering scheme.

The processing of applications should continue uninterrupted, and new applications should be accepted and processed as per the existing regulations. Once the new regulations are finalized, all applications received thereafter can be processed in accordance with the new policy.

I kindly request your prompt intervention in this matter to resolve the issue and ensure that the interests of consumers are protected.

Thank you for your attention to this matter.

Sincerely,
Ijaz bacha



NEPA
Licensing Department
Diary No. 2103
Date: 22-12-25

CHAIRMAN

Dy No. 7238
Date: 18-12-25

Humayun Saifullah Khan

Forwarded to:

<input checked="" type="checkbox"/> For no. action	<input checked="" type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Adminstr.)
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<input checked="" type="checkbox"/> ADP (IT)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (S.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Economic)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Peshawar Office
KPTMA House
Jamrud Road
Peshawar Cantt

Islamabad Office
Kashmir Commercial Complex
Fazal-ul-Haq Road
Blue Area
Islamabad

Dated: January 14, 2026

To,

ENGINEER WASEEM MUKHTAR
Chairman
NEPRA - National Electric Power Regulatory Authority,
Islamabad

Subject: **SOLAR SYSTEM POLICY IS SUFFICIENT, LOSSES CAN BE OFF-SET THROUGH CARBON CREDITS.**

REGISTRAR OFFICE
Diary No: 1348
Date: 23.1.26

My dear Chairman NEPRA,

I hope you are in good health. I would like to submit a few recommendations for your kind consideration which may greatly benefit consumers using solar systems.

Many countries world-wild offers various forms of financial support such as subsidies, tax credits and grants to encourage the installation of use of solar energy systems. These countries includes Germany, United Kingdom, Italy, Spain, France, Austria, Netherlands, India, China, Japan, UAE, Kenya, Nigeria, Tanzania and Canada.

In late 2025 the Federal Government decided to end the net metering system for solar installations and introduce the gross billing policy and NEPRA issued draft rules to implement this decision.

Under net metering consumed and supplied electricity units were adjusted at the same rate which enabled millions of consumers to install solar systems due to rising electricity prices. This policy created confidence among consumers and investors and supported clean energy growth.

Experience worldwide shows that many new infrastructure regulators were created in recent decades to ensure stable long term commitments by governments and investors. These frameworks were expected to encourage private investment and benefit consumers. However experience also shows that good intentions alone do not guarantee good results. Both consumers and investors have often been dissatisfied with regulatory performance.

There is disagreement about what exactly has gone wrong which makes independent and public evaluation essential. Regulatory effectiveness requires regular reviews similar to medical checkups that detect problems at an early stage. Once regulatory systems are established they tend to resist change without evaluation and may fail to achieve their goals. Periodic and independent reviews help identify issues and force improvement.

Registrar

4

Adm. DG	Adm. Dir.	DD
ADP	PO	EN
CA	CA	CA

CHAIRMAN
By No: 615
Date: 23-1-26

Humayun Saifullah Khan

Peshawar Office

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Islamabad Office

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Islamabad

The proposed gross billing system will significantly reduce new solar installations and negatively impact the environment and national grid. Under the new policy electricity imported from the grid will be charged at Rs 55 to Rs 60 per unit. Electricity exported from solar systems will not be paid at Rs 25 under NAPPP but around Rs 9 per unit under the National Energy Power Purchase Price. Imported and exported units will not be netted off and will be calculated separately which will make solar investment financially unattractive.

According to an article published in News International on Monday August 11 2025 by Engineer Hussain Ahmad Siddiqui Ex-Chairman State Engineering Corporation titled **Fix the Grid** Analysis Pakistan it is highlighted that national electricity supply consistently falls short of demand causing load shedding and economic disruption.

The article states that renewable energy including solar wind and bagasse contributes only about 5 percent of total generation and even this capacity is underutilized due to technical and infrastructure limitations.

Another article by Asad Mahmood published in News International on December 8 2025 titled **Deconstructing Pakistan's Green Energy Projects** explains that Pakistan's renewable challenges arise from policy and implementation failures rather than technology. Both articles confirm that installed capacity alone does not ensure reliable supply due to transmission bottlenecks line losses and system inefficiencies.

Article by Dr. Khalid Waleed "Trade & Carbon Practical Market Adjustment" published in the news international Newspaper on Monday, January 12, 2026, states that carbon pricing and European carbon border adjustment mechanism (EUCBAM) are changing global trade by linking emissions with export competitiveness. Clean Power System gain an advantage while carbon heavy grids faces higher cost. For Pakistan this creates export risks and makes grid decarbonized and market reform essential.

The Article by Muhammad Umar "Green contracts a solar boom" published in the news international newspaper on January 12, 2026, the main theme of the article is regulating Pakistan's solar boom. It urges that green contracts are needed to integrate solar into power market. It stresses treating distributed renewables as market participants not a threat to revenue. The focus is on stability affordability and low carbon power system.

I would also like to mention that I have installed 80 KWp solar system at my residence that cost me Rs.10 million. I have generated 109 MWh electricity from this solar system in last 18 months and the carbon credit (1 carbon credit = 1 tonne carbon reduction), I achieve is 110.

My home address: **House No. 21-A, Orchard Scheme, Murree Road, Islamabad.**

Humayun Saifullah Khan

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S.No.	System Capacity	Commissioned	Total Generation Till date	CO2 Remission	1 carbon credit	Total
-------	-----------------	--------------	----------------------------	---------------	-----------------	-------

1.	33.96	21-Sep-24	53 MWh	54 Tonnes	1 tonne of carbon reduction	54
2.	46.98	13-Mar-25	56 MWh	56 Tonnes	1 tonne of carbon reduction	56
Total =>						110

Opinion by Moin M. Fudda ONZM, S.I. Published December 22, 2025 states that the practical solution is to protect the existing net metering frame work while supporting solar growth through a clear national carbon emission policy, NEPRA should do their job to avoid changes that discourage solar users and instead allow net metering consumers to earn carbon credits. These credits can be transfer to DISCOs and sold in international market. This will strengthen DISCOs finances, support clean energy goals and align with the Government's stated vision for solarization

These benefits should be recognized within national energy planning instead of discouraging solar adoption. Continued reliance on coal based thermal power plants increases fuel imports and having negative impact on climate, and places additional pressure on foreign exchange reserves.

The key institution for carbon credit registration and authorization is the Ministry of Climate Change and Environmental Coordination (MoCC&EC), which hosts the Designated National Authority (DNA) and the new carbon market functions. How to start registration for earning credits? For a project developer in Pakistan, the immediate institutional steps are:

Send a concise Project Idea Note (technology, location, expected emission reductions, chosen standard – e.g. Verra/GS/Article 6.4) to MoCC&EC requesting guidance on:

- * Host Country Approval (HCA/LoA) process.
- * Registration in the upcoming national carbon registry and treatment under Pakistan's Carbon Market Rules.

In parallel, engage with an international standard (Verra, Gold Standard, or Article 6.4 mechanism) for the project design and validation cycle; MoCC&EC's guidelines explicitly recognize such standards and are preparing a list of approved ones. Guidelines are yet to be approved by the Cabinet.

Carbon Credit Eligibility Checklist For Already-Installed Large-Scale Solar Projects

Basic Project Details

Installed capacity (MW)
Project type (Grid-connected / Captive)
Location (City / Province)
Commissioning date (COD)

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Timing & Eligibility (Critical)

Commissioned within last 24 months
No previous carbon registration
Any evidence of prior consideration of carbon finance

Technical Documents

Commissioning certificate
Grid interconnection approval / DISCO / NTDC letter
Net-metering or PPA agreement
Single-line diagram (SLD)
Inverter & meter specifications

Generation Data

Monthly electricity generation data (MWh)
Minimum 6-12 months records
Calibrated, tamper-proof meter

Financial Information

Total project cost (CAPEX)
Source of financing
Financial model (IRR)
Proof carbon revenue improves viability

Estimated Carbon Potential (Pakistan)

~1 MW solar = 1,300-1,500 tCO₂/year
Market price: USD 3-8/tCO₂
Carbon income is supplementary

Important Notes

Carbon credits are not guaranteed
Credits are not backdated
Best route: Voluntary Carbon Market (Vera/Gold Standard)

If the policy direction is toward gross billing then the purchase price of exported electricity must not be as low as Rs. 9 per unit as reported in electronic media. It should be aligned closer to the national average power purchase price to ensure fairness sustainability and continued consumer participation. I am sending you the book from World Bank "hand book for evaluating infrastructure Regulatory Systems" for your ready reference please. The Authors of this book is Ashley C. Brown, Jon Stern & Bernard Tenenbaum with Defne Gencer, they served as Regulator in United States and worked with the international regulatory bodies. They have worked extensively with the World Bank and developing countries focuses on electricity infrastructure, international infrastructure regulation. I am also attaching process flow for carbon generation and issuance and project team ATR, Inc. ATR (ASSESS, TRANSFORM & REACH) i.e. any international consulting firm based in South Korea, specializing in full spectrum of carbon credit projects.

Humayun Saifullah Khan

Peshawar Office

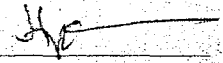
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Kashmir Commercial Complex
Fazal-ul-Haq Road
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Islamabad

I respectfully request NEPRA to reconsider the proposed framework in the broader interest of consumer's energy security environmental protection and economic stability.

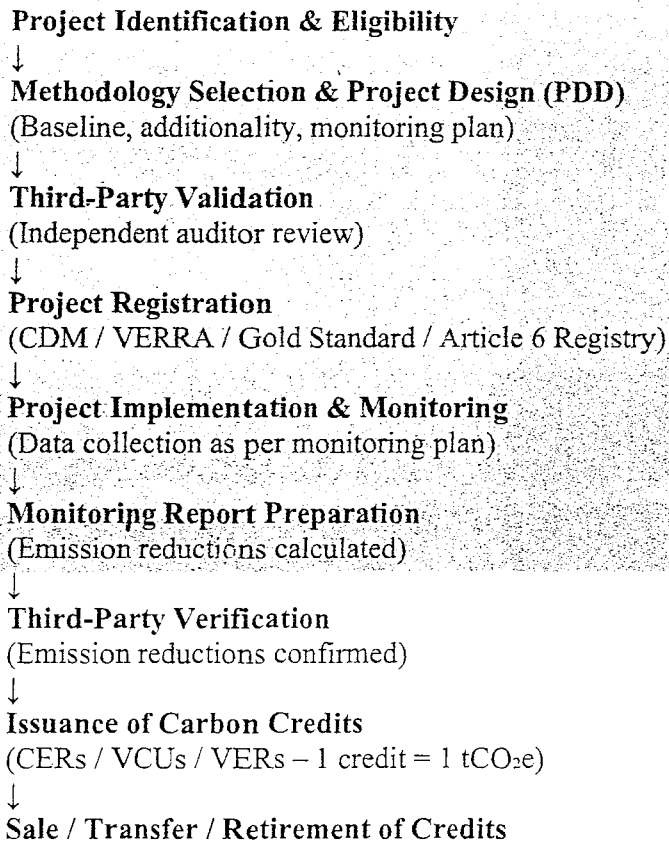
Yours truly,



Humayun Saifullah Khan (N.I.)
Former MNA/ Provincial Minister
Kashmir Commercial Complex
Islamabad

PROCESS FLOW FOR CARBON CREDIT GENERATION AND ISSUANCE

Carbon Credit Claiming Process – One-Slide Flow Diagram



1. Project Identification & Eligibility

- Identify an activity that reduces or removes GHG emissions (e.g., renewable energy, clean cooking, waste management, water filtration).
- Check eligibility under a recognized carbon standard and select an approved methodology.
- Define project boundary, baseline scenario, and additionality.

2. Project Design Document (PDD) Preparation

- Prepare a **PDD** describing the project, technology, baseline emissions, monitoring plan, and expected emission reductions.
 - Conduct stakeholder consultations if required by the standard.
 - Compile supporting evidence (financial, technical, regulatory).
-

3. Validation by Independent Auditor

- An accredited **third-party auditor** (DOE/VVB) reviews the PDD.
 - Auditor confirms additionality, baseline, methodology application, and compliance.
 - Validation report is issued.
-

4. Registration with Carbon Standard

- Submit validated PDD to the selected registry (CDM, VERRA, Gold Standard, etc.).
 - Upon approval, the project is **officially registered** and becomes eligible to earn carbon credits.
-

5. Project Implementation & Monitoring

- Implement the project as per the PDD.
 - Monitor emission reductions according to the approved monitoring plan.
 - Maintain records, meters, surveys, and operational data.
-

6. Monitoring Report Preparation

- Prepare a **Monitoring Report** covering a defined crediting period.
 - Calculate actual emission reductions achieved.
 - Include all supporting data and evidence.
-

7. Verification by Independent Auditor

- The same or another accredited auditor verifies the Monitoring Report.

- Site visits, data checks, and calculations are reviewed.
 - A **Verification Report** is issued confirming emission reductions.
-

8. Issuance of Carbon Credits

- Verified emission reductions are submitted to the registry.
 - Carbon credits (CERs / VCUs / GS VERs) are **issued into the project account**.
 - Each credit represents **1 ton of CO₂ equivalent**.
-

9. Sale, Transfer, or Use of Credits

- Credits can be sold to buyers, transferred to another account, or retired for compliance or voluntary offsetting.
 - Revenue is generated based on market price and contract terms.
-

10. Ongoing Compliance & Re-Verification

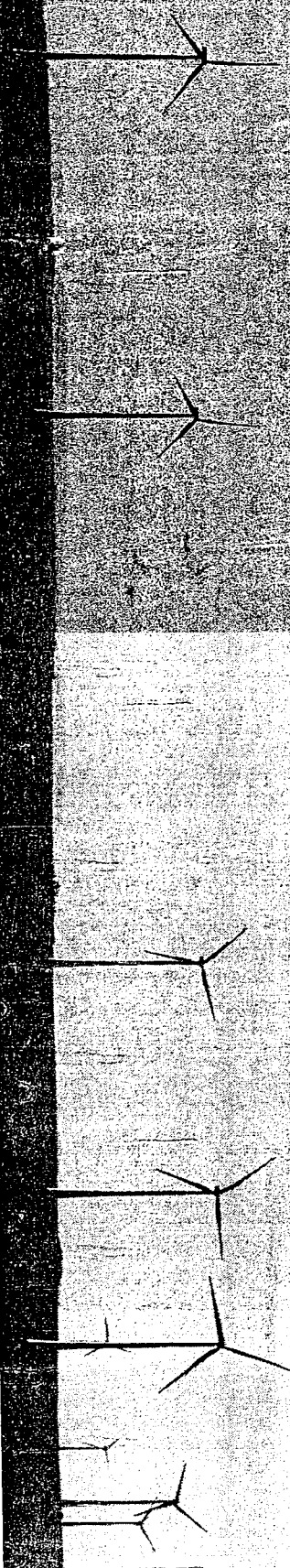
- Repeat monitoring, verification, and issuance for each crediting period.
- Ensure long-term compliance with registry rules and host country requirements (especially under Article 6).

ATR

YOUR CARBON SOLUTION

Project Teann ATR, Inc.

Completion Profile 2025

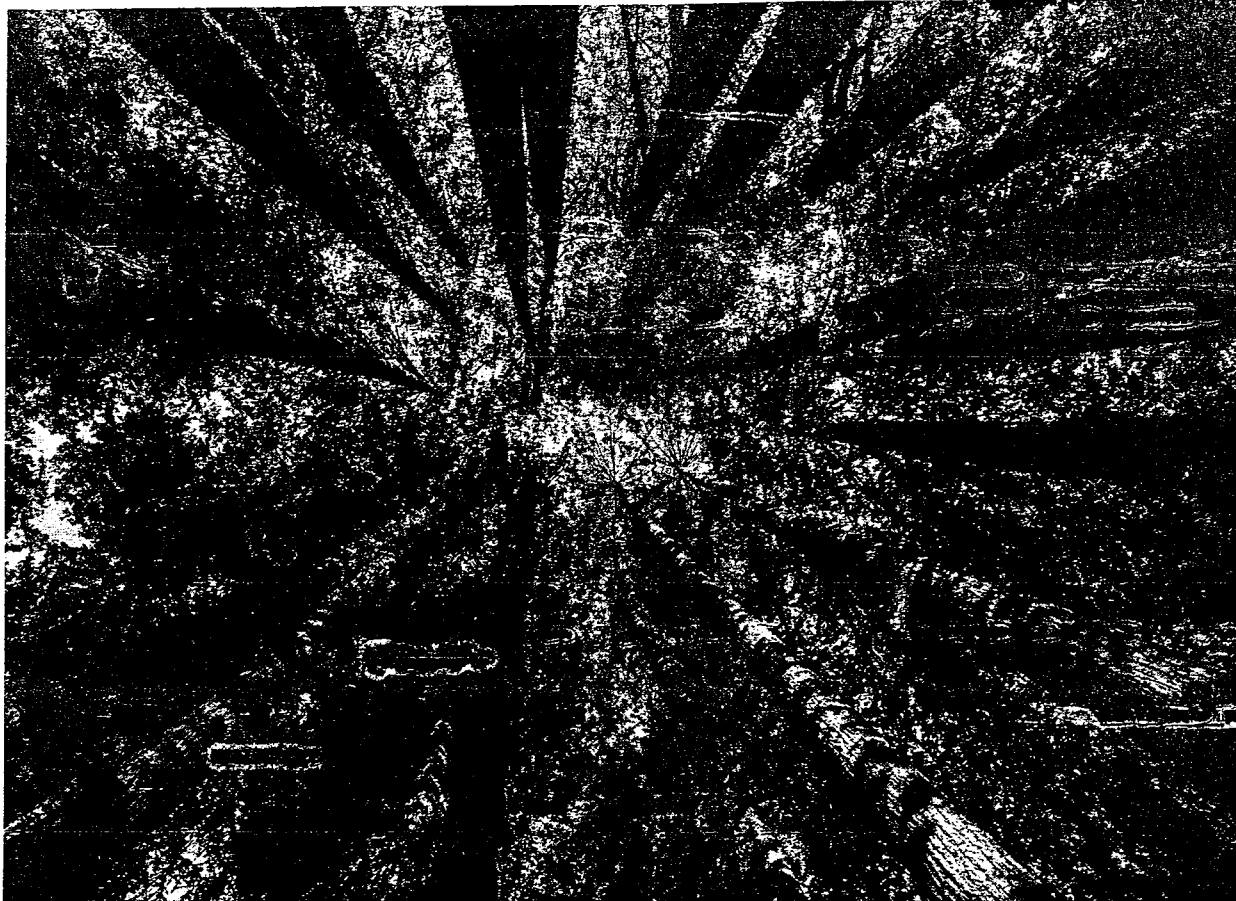


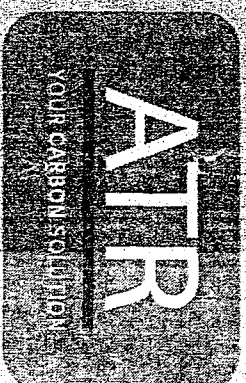


We are a project developer of high-quality carbon projects
accredited by leading verification standards.

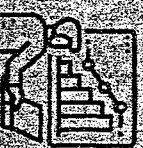
ATR develops and implements comprehensive emission reduction projects and
strategies that turn climate action into long-term business opportunities for
private companies, governments and organizations around the world.
Our purpose is to accelerate global transformation and transition to a decarbonized economy.

ATR YOUR CARBON SOLUTION

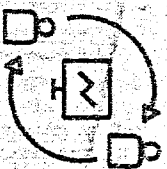




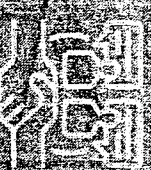
Development of
carbon credit
projects



Carbon credit
registration
and monitoring



Carbon credit
sales &
brokerage



Domestic
carbon reduction
consulting

Our Portfolio



ATR Offices

Pakistan

- Safe Drinking Water Programme In Punjab
- Punjab Clean Water & Carbon Solutions in Pakistan
- Lahore LFG project
- Bahawalpur Cholistan Biochar project
- 147MW Patind Hydro Power Project

GPI Solar Energy Project

Cambodia

- Mangrove afforestation and reforestation project in Cambodia
- Water Purification System for Safe Drinking Water (SDW) in Cambodia

Preah Sihanouk LFG project

Republic of Korea

- Turu EV Charging Network Project
- Electric Vehicle Charging Programme in Korea
- SK Electlink EV Charging Carbon Offset Project

Viet Nam

- Hue LFG project
- Modular 6MWth Tri-Generation Plant Demonstration with Unused Biomass

Solar/ESS/EV Charger Project

Indonesia

- Water Purification System for Safe Drinking Water (SDW) in Indonesia

Project

New/Enhanced Solution

Electric Vehicle

Safe Drinking Water

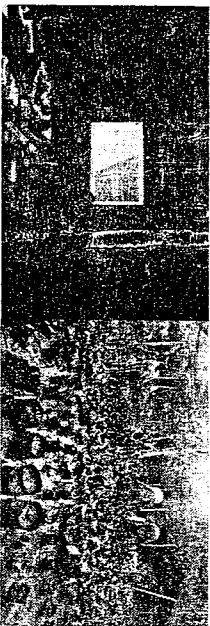
Landfill Gas

ATR is implementing a community-based Nbs project across three coastal regions in Cambodia, focusing on mangrove afforestation and restoration activities. The project outcomes include carbon removal, coastal protection, and enhancement of biodiversity to deliver climate solutions starting from the coast.

It also provides co-benefits such as marine ecosystem conservation, improved water and air quality, and contributions to poverty reduction and gender equality.

Project Name	Mangrove afforestation and reforestation project in Cambodia
Project Location	Three provinces (Kampot, Kep and Sihanouk) in Cambodia
Project Type	AFOLU (Agriculture, Forestry, and Other Land Use)
Methodology	VM0033 -Methodology for Tidal Wetland and Seagrass Restoration
Project Status	Project Development

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Cambodia Partners



MOE



FIA



MAFF

1. NO IMPACT



2. MINOR



5. SIGNIFICANT



13. SUBSTANTIAL



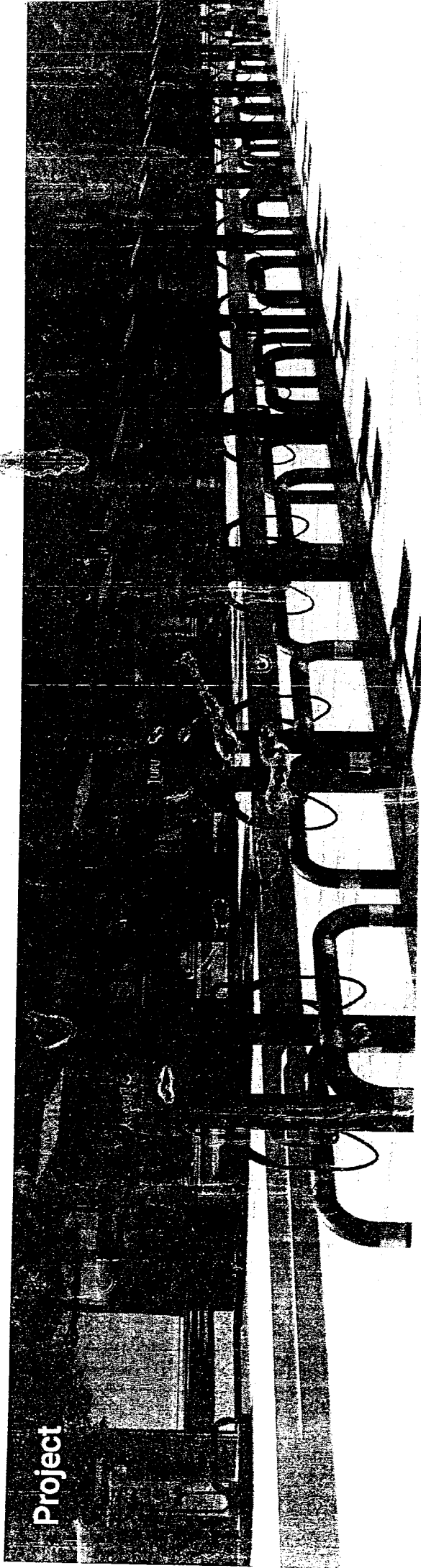
14. LIFE THREATENING



15. CATASTROPHIC



Project



Climate-based solution

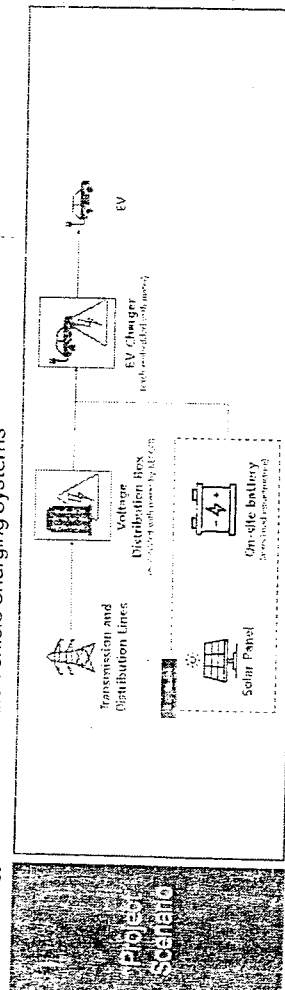
Electric Vehicle

Safe Drinking Water

Landfill Gas

EVs produce only 30% of the emissions compared to traditional fuel-powered vehicles. ATR plays a key role in this transition by providing data analysis and certification support for carbon credit issuance. Based on charging volumes, ATR calculates and monitors emission reductions to secure carbon credits through verified carbon reduction performance. Proceeds from the sale of these credits are reinvested into expanding EV infrastructure, including the installation of additional charging stations—creating a sustainable cycle of growth and impact.

Methodology VM0038: Electric Vehicle Charging Systems



Transmission and Distribution Lines

Voltage Distribution Box

EV Charger with on-board infrastructure

EV

On-site battery with on-board infrastructure

Solar Panel

Transmission and Distribution Lines

Voltage Distribution Box

EV Charger with on-board infrastructure

EV

On-site battery with on-board infrastructure

Solar Panel

Projects	Status	Project Country
----------	--------	-----------------

1) Turo EV Charging Network Project

Issuance

2) Electric Vehicle Charging Programme in Korea

Issuance

3) SK ELECTROLINK EV Charging Carbon Offset Project

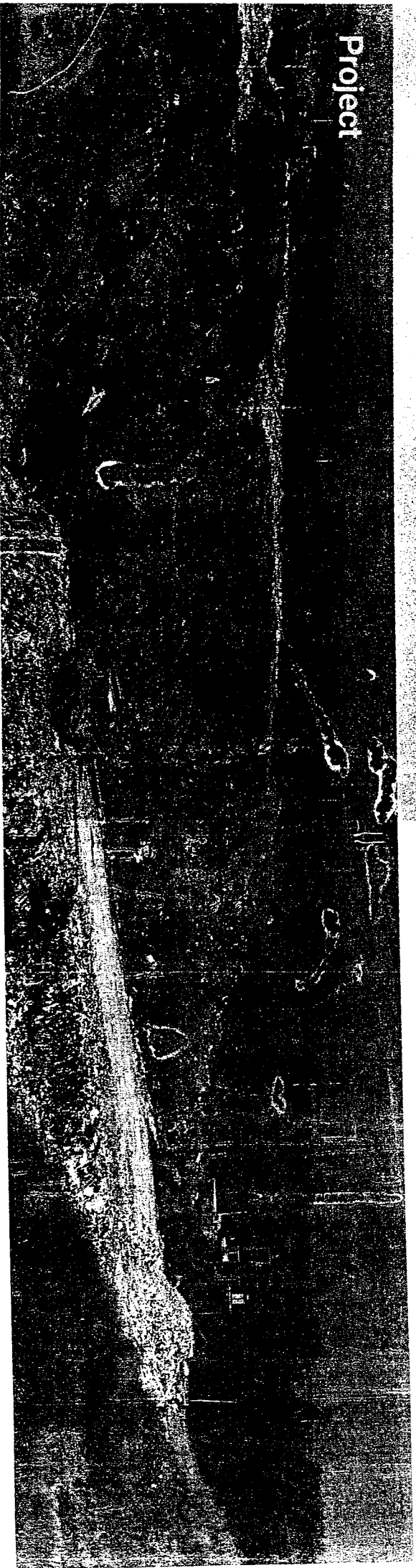
Verification

HYUNDAI EVERCON HUMAX Mobility SK
HYUNDAI EVERCON HUMAX Mobility SK



ATR YOUR CARBON SOLUTION

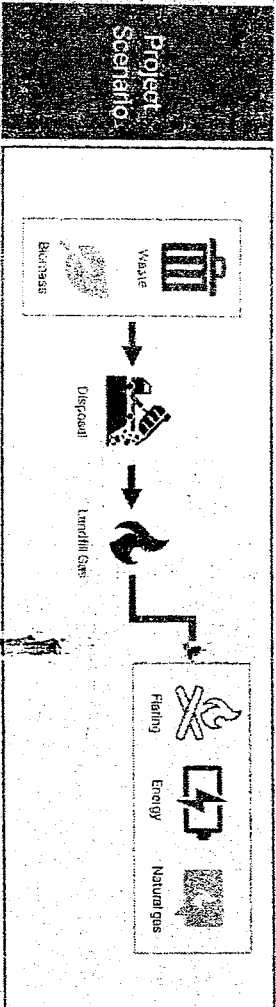
Project



- Mature-based Solution
- Electric Vehicle
- Safe Drinking Water
- Landfill Gas

Over a 100-year period, methane (CH_4) has a global warming potential approximately 28 to 36 times greater than that of carbon dioxide (CO_2). ATRI is developing four projects that capture methane (CH_4), a potent greenhouse gas found in landfill gas (LFG) produced by the decomposition of organic waste in landfills. These projects use dedicated capture facilities to collect the methane, which is then either flared or used to generate energy—effectively removing it from the atmosphere.

Methodology ACM 0001: Landfill gas flaring and use; AMS-11.G: Methane Capture & Utilization



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Projects	Gas Capturing	Status
----------	---------------	--------

- 1) Vietnam, Hue LFG project
- Power Generation

- 2) Cambodia, Preah Sihanouk LFG project
- Project Development

- 3) Pakistan, Lahore LFG project
- Gas flaring

Urban Planning & Consulting

Project



Nature-based Solution

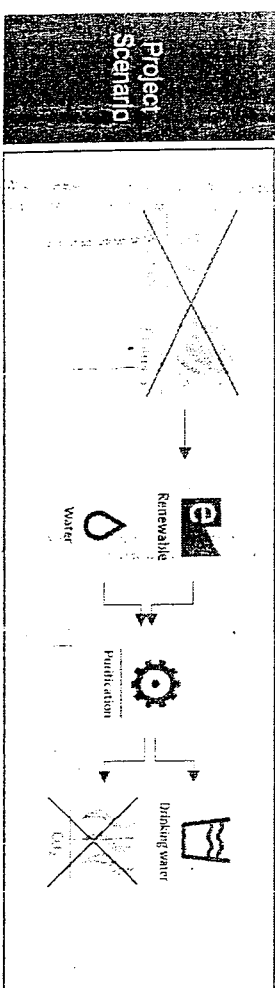
Electric Vehicle

Safe Drinking Water

Landfill Gas

ATR is responsible for the installation and maintenance of water purification facilities in the project area. These systems are designed to ensure reliable access to safe and clean drinking water for the local population. By improving water quality and access, the initiative aims to reduce the prevalence of waterborne diseases, which pose significant health risks to entire communities.

Methodology AMS-III.AV: Low GHG emitting safe drinking water production systems
Fossil fuel and biomass will be replaced by filtration plants to provide safe drinking water.



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FOR SALE

1) Water Purification System for Safe Drinking Water in Cambodia

Verification

2) Safe Drinking Water Programme in Punjab, Pakistan (PSPPA)

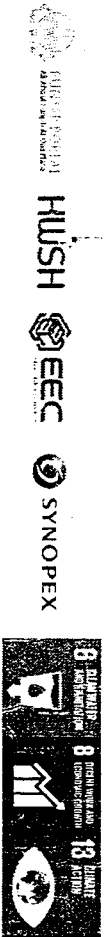
Issuance/Sales

3) Punjab Clean Water & Carbon Solutions in Pakistan

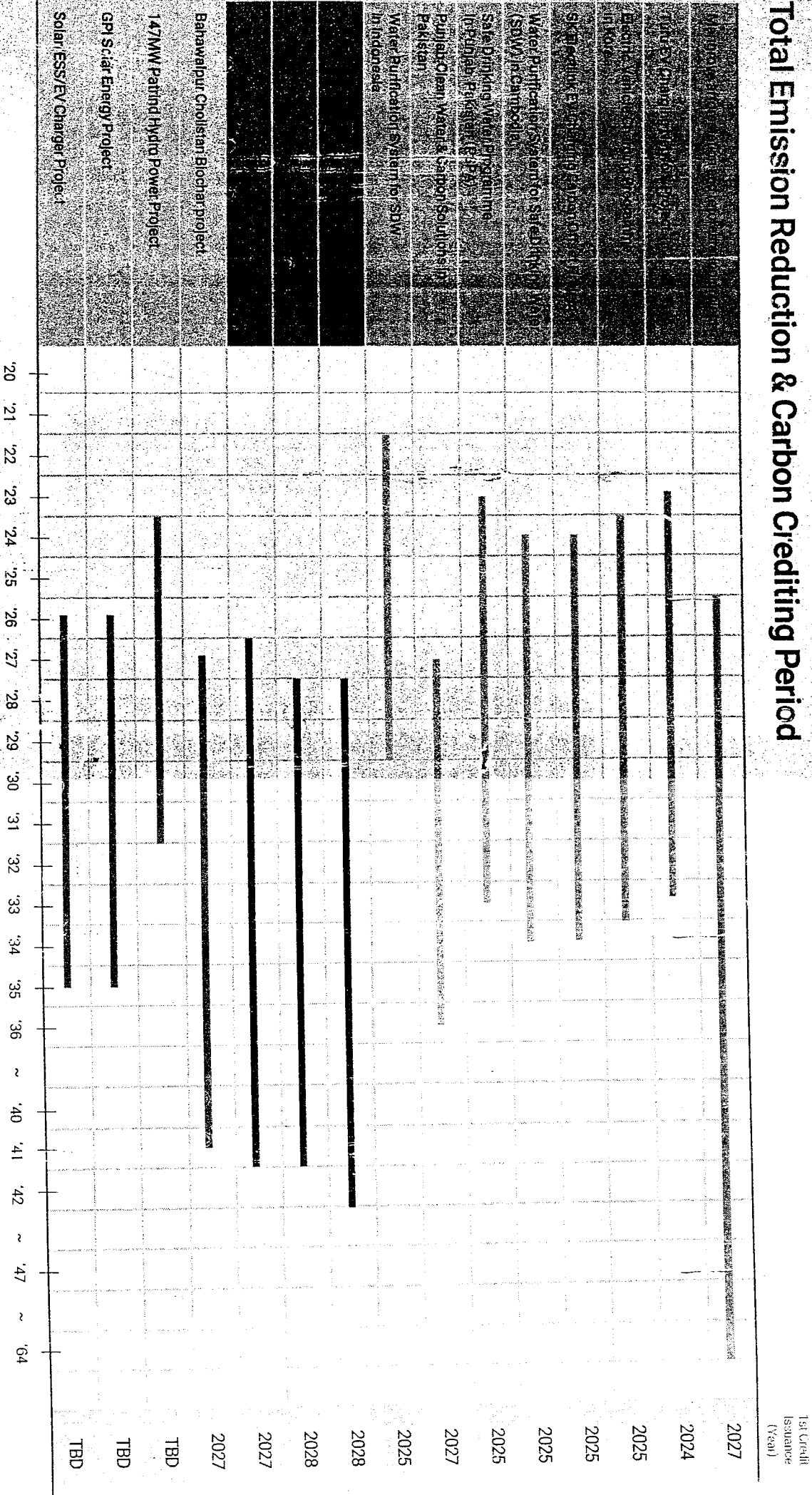
Project Development

4) Water Purification System for Safe Drinking Water in Indonesia

Verification



Total Emission Reduction & Carbon Crediting Period



Project – Pipeline

Projects Under Preliminary and Feasibility Studies

No	Project Name	Country	Project Stakeholders	Expected Project Start Date	Expected Credit Issuance Date
1	GPI Desertification Prevention Project	Pakistan	GPI	-	-
2	GPI Biodiesel Project	Pakistan	GPI	2026 Q2	2028 Q1
3	ParkView City Development Project	Pakistan	ParkView City	2026 Q3	2027 Q4
4	Gas Leakage Prevention Project in Pakistan	Pakistan	SNGPL / SSGC	2025 Q4	2027
5	PSPA 3,000-Unit Water Purification Project	Pakistan	PSPA	2025 Q4	2028 Q3
6	Sri Lanka Water Purification Project	Sri Lanka	TBD	2026 Q3	2028 Q2
7	Thailand Plastic Recycling Project	Thailand	Thai Plastic Recycle Group	2024 Q2	2026 Q4
8	Sindh Province Afforestation/Reforestation Project	Pakistan	Sequeria, Government of Sindh	2025 Q4	TBD
9	Kyrgyzstan Safe Drinking Water Project	Kyrgyzstan	Bishkek	2026	TBD
10	Cambodia Safe Drinking Water Project	Cambodia	TBD	TBD	TBD

Certified



Corporation

<https://atr-pt.com/>

info@atr-pt.com

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History

Company History

2019

- Project Team ATR, Inc. established

2020

- In-house R&D center launched
- Certified as an environmental consulting firm

2021

- Registered as a carbon-neutral consulting agency under the Innovation Voucher Platform of the Small and Medium Venture Business Corporation

2022

- Delivered 8 carbon-neutral management innovation voucher projects (consulting sector)
- Certified as an expert research business operator
- Received the Pinovation Award at the 2022 Pinovation Challenge
- Provided global carbon neutrality policy research services for K-Water

2023

- Conducted a capacity building workshop on carbon market mechanism development under the Paris Agreement, providing training to the Government of Pakistan including MOCC
- Signed MOU with Cambodia's MOE on GHG reduction project
- Representative Office opened in Cambodia

2024

- Recognized as an Excellent Environmental Job-Creating Company
- Supported pre-feasibility study for LFG power generation project in Hue Province, Vietnam
- ATR Carbon Solution Ltd. established in Pakistan

2025

- Acquired B Corporation Certification



3+4
⑦

Fwd: Subject: Comments on Draft Nepra Prosumer Regulations 2025, Transition from Net Metering to Net Billing, Industrial Cross Subsidy, and the Need to Rationalize Fixed Charges for Distributed Solar Consumers

From <cad@nepra.org.pk>
To Lashkar Khan <lashkar.khan@nepra.org.pk>
Date 2025-12-18 08:51

1000187113.jpg (~195 KB)

----- Original Message -----

Subject: Subject: Comments on Draft Nepra Prosumer Regulations 2025, Transition from Net Metering to Net Billing, Industrial Cross Subsidy, and the Need to Rationalize Fixed Charges for Distributed Solar Consumers

Date: 2025-12-18 00:45

From: Rehan Jawed <rehanjawed@hotmail.com>

To: "awaisleghari@hotmail.com" <awaisleghari@hotmail.com>, "chairman@nepra.org.pk" <chairman@nepra.org.pk>, Registrar <registrar@nepra.org.pk>, "amina.ahmed@nepra.org.pk" <amina.ahmed@nepra.org.pk>, "mubashar.jalal@nepra.org.pk" <mubashar.jalal@nepra.org.pk>, Consumer Affairs Department <cad@nepra.org.pk>

Sardar Awais Ahmad Leghari,
Honourable Federal Minister
Ministry of Energy Power Division
Government of Pakistan
Islamabad

Chairman,
National Electric Power Regulatory Authority
Islamabad

Registrar,
National Electric Power Regulatory Authority
Islamabad

Dear All,

I would like to congratulate you and your teams on initiating the transition from the earlier net metering framework to the net billing regime. I have been repeatedly highlighting the undeserved benefit being availed by net metering users. This shift reflects an important policy recognition that energy exported to the grid and energy imported from the grid must be valued separately in order to improve transparency and system discipline.

At the same time, I wish to highlight a structural gap that, if left unaddressed, will continue to undermine tariff rationalization efforts and exacerbate the industrial cross subsidy burden, which currently stands at approximately Rs 131 billion annually.

While the transition to net billing corrects energy pricing distortions, it does not adequately address recovery of fixed grid costs from distributed solar consumers. Residential consumers under net billing continue to rely on the national grid as a full standby and balancing mechanism, yet their contribution towards capacity payments, network fixed costs, and system availability remains disproportionately low. As a result, these costs continue to be shifted onto industrial and fully grid dependent consumers.

This imbalance has two serious implications. First, it directly sustains and potentially increases the cross subsidy burden imposed on industry, further weakening competitiveness, exports, and electricity demand. Second, it significantly improves the economics of combining rooftop solar with battery energy storage systems. After transition from net metering to net billing, There is a massive flood of Battery about to come in, which will result in residential users keeping grid on standby without paying anything against fixed cost of grid which will ultimately be recovered from Industry.

As grid tariffs rise and fixed costs remain under recovered from net billing consumers, higher income households will logically invest in large battery systems, progressively reducing their grid dependence while still expecting grid availability. This will accelerate demand erosion, increase stranded capacity costs, and intensify tariff pressure on remaining consumers.

Unless fixed charges are imposed on net billing consumers on a per kW

Pertain to Licensing Dept please

DC (Licensing)

Start Compiling Comments
Mr. Shubhal

18/12/25

Addl. DG	PS	Addl. Dir	DD-I
ADD-II	RD	PS	E/S
ADD-III	ADD-IV	ADD-V	ADD-VI

(Sanctioned load) basis, the transition from net metering to net billing will remain incomplete from a cost recovery perspective. Demand will continue to shrink, grid costs will be socialized over a smaller consumer base, and industrial cross subsidies will persist despite policy intentions to reduce them.

I respectfully submit that fixed charges should be applied to net metering /Net billing consumers based on sanctioned load, at a rate of Rs 1,250 per kW. Such a measure would materially improve recovery of grid fixed costs, reduce reliance on industrial cross subsidies, and align the net billing framework with the economic realities of a capacity constrained power system, particularly as tariff rebasing approaches.

This is not a punitive intervention. It is a necessary structural correction to protect grid sustainability, lower the Rs 131 billion cross subsidy burden on industry, and prevent an uncontrolled shift towards battery driven grid defection by affluent residential consumers.

I hope these comments are received in the spirit of constructive policy engagement, and I will send further comments on this matter.

Yours sincerely,

Rehan Javed
Industrial Consumer
03458256891



NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (NEPRA)



اب آپ "نیپر آسان اپروچ" موبائل ایپلیکیشن کے ذریعے
بجلی کے متعلق کوئی بھی شکایت فوری درج کروا سکتے ہیں

NEPRA ASAN APPROACH
ہر وقت بروقت

PUBLICATION OF DRAFT OF THE NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (PROSUMER) REGULATIONS, 2025 FOR ELICITING PUBLIC OPINION

In exercise of the powers conferred by section 47 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (XL of 1997) ("NEPRA Act"), the Authority is pleased to publish draft of the National Electric Power Regulatory Authority (Prosumer) Regulations, 2025 for eliciting public opinion thereon as required under section 47(3) of the NEPRA Act. These Regulations can be accessed through the NEPRA's official website under the "News" Section. Comments may be sent to the Registrar (NEPRA) on the address given below within thirty(30) days of this publication.

Wasim Anwar Bhinder
Registrar NEPRA

NEPRA Tower, Attaturk Avenue (East), G-5/1, Islamabad
Phone: 051-2013200 | Fax: 051-2600021

Email: registrar@nepra.org.pk

For further information, please visit: www.nepra.org.pk

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 10:25 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Public Comments on NEPRA (Prosumer) Regulations 2025 - Waseem Ahmed Ashraf (Individual Household Prosumer)

From: bilal ashraf <bil.ashraf@yahoo.com>
Sent: Sunday, January 11, 2026 11:38 AM
To: registrar@nepra.org.pk
Subject: Public Comments on NEPRA (Prosumer) Regulations 2025 - Waseem Ahmed Ashraf (Individual Household Prosumer)

 **Waseem Ahmed Ashraf**


House 278, Street 7, F-10/3

Islamabad

PUBLIC COMMENTS ON

NEPRA (Prosumer) Regulations, 2025
Submitted by: An Individual Household Prosumer

1. Background

 I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into **millions of rupees**, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering.

This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

- Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and
- converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are **long-term household infrastructure investments**. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

- breaks public trust,
- violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,
- discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

- households bear **all capital, maintenance, and compliance costs**,
- distribution companies can limit or curtail exports,
- yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

- the household carries all financial risk,
- the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are **not wealthy investors**. They are middle-income families trying to:

- protect themselves from rising electricity tariffs,
- reduce load-shedding exposure,
- contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

- how export rates were determined,
- whether savings from reduced fuel imports were considered,
- how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.



7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. **Protect Existing Household Prosumers**
All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.
2. **No Mid-Term Changes to Buy-Back Rates**
Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.
3. **Fair and Transparent Valuation**
Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.
4. **Clear Policy for Future Installations Only**
If changes are necessary, they should apply only to **future applicants**, with full disclosure before installation.



8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure **fairness, predictability, and protection for household prosumers** who invested in good faith.

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 10:25 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Comments on Draft Prosumer Regulations, 2025 – Request for Reconsideration by the Authority

From: Muhammad Arif <energyjurists@gmail.com>
Sent: Sunday, January 11, 2026 2:15 PM
To: registrar@nepra.org.pk
Subject: Comments on Draft Prosumer Regulations, 2025 – Request for Reconsideration by the Authority

Dear Sir,

I respectfully submit consumer, regulatory, and implementation concerns arising from the Draft Prosumer Regulations, 2025, and to request the Authority's urgent reconsideration of the proposed framework in fulfilment of its statutory mandate under the NEPRA Act. 1997.

1. Economic Disincentive to Rooftop Solar

The proposed buy-back mechanism values exported solar electricity at approximately Rs. 11.30 per unit, while imported grid electricity is charged at around Rs. 61 per unit. This pricing structure requires more than five units of exported solar energy to offset the cost of one imported unit. Such a disparity renders rooftop solar commercially unviable, discourages future investment, and contradicts national policy objectives for renewable energy growth and distributed generation.

2. Existing Prosumers Facing Quasi-Retrospective Financial Penalty

A substantial number of existing prosumers invested under NEPRA-notified net-metering policies that provided seven-year protection period. As this period approaches completion, the proposed regime risks imposing financial disadvantage on consumers who made investment decisions in reliance on regulatory assurances. This undermines principles of regulatory certainty and legitimate expectation, which are fundamental to maintaining investor confidence in regulated sectors.

3. BTPL-Specific Compliance Failures and Consumer Harm

BTPL has continued to operate without a valid distribution licence since October 2020. It has imposed unauthorized tariff adjustments, miscellaneous charges, and arbitrary deductions of exported solar units. Most critically, BTPL has been illegally deducting 30% of legitimately exported solar units from prosumer accounts without approval of NEPRA, without legal basis, and in direct violation of NEPRA's notified net-metering framework and determinations.

Despite repeated consumer complaints and NEPRA determinations, enforcement action has remained inadequate. This has left affected consumers unprotected, caused direct financial harm, and weakened regulatory credibility. Any new prosumer regime introduced without enforceable compliance safeguards risks further enabling such abusive practices.

• 4. Regulatory and Legal Concerns

The proposed framework, in the absence of explicit enforcement mechanisms, exposes consumers to potential abuse by unlicensed or non-compliant operators. This undermines NEPRA's statutory responsibility to regulate the sector, protect consumers, ensure fair market practices, and maintain public confidence in regulatory governance.

Pray

In view of the above, it is respectfully prayed that the Authority may be pleased to:

1. Strictly enforce NEPRA determinations and prohibit distribution companies from imposing self-devised deductions, unauthorized charges, or unilateral tariff adjustments.
2. Take immediate enforcement action against BTPL for illegal deduction of 30% exported solar units and continued operation without a valid licence.
3. Confirm that the seven-year protection period for existing prosumers is calculated from the actual date of meter installation and operationalization.
4. Ensure that the transition to any new prosumer regime does not impose retrospective or quasi-retrospective financial penalties on existing consumers.
5. Introduce explicit safeguards to prevent abuse by unlicensed or non-compliant operators, including strict compliance conditions prior to allowing participation in any revised prosumer framework.
6. Reassess the proposed buy-back pricing mechanism to ensure commercial viability of rooftop solar and alignment with national renewable energy policy objectives. The buy back rate should no way be less than the cost of purchase of electricity including average capacity charges.

WEW MAY KINDLY BE PROVIDED AN OPPORUTNITY TO PRESENT OUR CASE IN PERSON
DURING THE AUTHORITY HEARINGS

Yours sincerely,

Muhammad Arif

692A, ROAD D, PHASE 3, BAHRIA TOWN, ISLAMABAD

0333 5191381

House No 88, Road A
Phase 5, Bahria Town,
Islamabad
11 Jan 2026

To: The Registrar,
National Electric Power Regulatory Authority (NEPRA)

Subject: Comments on Draft NEPRA (Prosumer) Regulations, 2025 — with proposed amendments and supporting references

Respected Registrar NEPRA, Asslam-o-Alekum

With reference to the Draft *National Electric Power Regulatory Authority (Prosumer) Regulations, 2025*, I submit the following point-wise comments for kind consideration.

1) Clause 2(h) — Definition of “Billing cycle”

Draft: “billing cycle” means energy recorded by the meters in a period of **thirty days**.

Comment: DISCO billing practice is normally aligned to **calendar months**, which vary between **28–31 days**. Fixing “30 days” can create inconsistencies in monthly reconciliation (especially February and 31-day months), and may complicate settlement of exported energy credits and billing disputes.

Suggested wording:

“Billing cycle means a monthly billing period aligned with the licensee’s meter reading / billing schedule (calendar month basis), and may vary from 28 to 31 days.”

2) Clause 2(i) and 2(j) — Technology scope of “Distributed generation facility / distributed generation”

Draft limits DG technologies to: solar, wind or biogas only.

Comment: Pakistan’s **Alternative & Renewable Energy (ARE) Policy 2019 (Gazette Notified)** recognizes a wider range of ARE technologies including **geothermal** and **ocean/tidal wave energy**, among others. (ppib.gov.pk)

To keep the prosumer framework technology-neutral and future-proof, DG definitions should not unnecessarily exclude other qualifying renewable technologies.

Suggested amendment (minimum): add **geothermal** and **ocean/tidal wave (marine)** energy to 2(i) and 2(j). (Or reference the ARE Policy 2019 scope so the definition automatically remains up-to-date.) (ppib.gov.pk)

3) Clause 3(2) — Capacity cap vs sanctioned load

Draft: DG capacity “shall not exceed the sanctioned load...”, and “the Authority may revise... **at any time**.”

(a) Allow practical PV sizing up to 1.5× sanctioned load (with export protection)

Comment: For solar PV, nameplate capacity is rated under standardized conditions; actual output varies significantly with irradiance, temperature, and sun angle across the day. A strict “ $DG \leq \text{sanctioned load}$ ” can force unnecessary under sizing and reduce self-consumption potential.

Suggested approach (grid-safe):

Allow installed PV capacity up to 1.5× sanctioned load, while limiting AC export to sanctioned load through inverter settings / export limiting, where required by the licensee. This supports better daytime matching and energy yield without increasing grid injection risk.

(b) Improve regulatory certainty on “revise... at any time”

Comment: “At any time” creates investment uncertainty.

Suggested safeguard: Any revision should be prospective, with published methodology, stakeholder consultation, and a clear effective date (e.g., applicable only to new applications after notice).

4) Clause 14 — Net Billing (export credited at NAEPP) and its system-wide implications

Draft: Net billing; export energy to be billed/credited at national average energy purchase price (NAEPP). Also, NEPRA may revise the export rate during the agreement term.

(a) Concern: Net billing at NAEPP may materially weaken prosumer economics

Comment: Export credit at NAEPP (instead of a higher reference such as NAPPP / avoided cost components) can significantly reduce payback viability for households and SMEs, thereby slowing distributed solar adoption and undermining policy objectives for indigenous clean energy.

(b) Root-cause issue: capacity payments and “Take-or-Pay” contracts already burden consumers (NEPRA’s own findings)

NEPRA’s State of Industry Reports repeatedly document that Pakistan’s power sector faces a major burden from surplus ‘Take-or-Pay’ capacity, where capacity charges are guaranteed regardless of non-utilization, meaning consumers pay for capacity even when it is not dispatched.

NEPRA quantified (FY 2021–22) that utilization of 30,303 MW base-load ‘Take-or-Pay’ thermal plants remained 46%, meaning consumers paid capacity charges for 54% unutilized capacity. NEPRA also provided plant-level examples such as Hub Power with utilization 12.78% and per-unit capacity payment Rs. 18.94/kWh (per kWh actually generated).

NEPRA further notes that surplus ‘Take-or-Pay’ capacity exacerbates circular debt and even “hinders the development of renewable energy sources,” discouraging investment in cleaner alternatives.

Therefore: The primary structural pressure on tariffs and the economy is strongly linked to fixed contractual capacity obligations and underutilization. Reducing prosumer export credit alone may not address this underlying cost driver.

(c) Circular debt pressure is macro-critical (NEPRA + IMF figures)

NEPRA reports power-sector circular debt Rs. 2,393.37 billion as of June 30, 2024, and shows payables to IPPs/GENCOs in the circular debt structure (Table 42).

IMF reports the stock of power sector circular debt at PRs 2,530 billion (2.2% of GDP) by end-February 2025. (IMF)

(d) Suggested solution: a balanced design that protects non-prosumers without killing rooftop solar

Instead of a sharp shift to low export valuation, NEPRA may consider a balanced structure, for example:

1. retain predictable export valuation for small prosumers for example 25KW or lesser, or apply a phased transition; and
2. publish a clear method and schedule for any rate revisions (Clause 14(3)) to protect regulatory certainty.

5) Clause 21 — Savings & Repeal: transition and “grandfathering”

The draft repeals the 2015 net metering regulations and provides transitional billing rules, including that existing valid agreements remain billed at **national average power purchase price (NAPPP) till expiry**, while future renewals move to **NAEPP**.

Suggestion: Strengthen clarity and investor confidence by explicitly stating that:

- executed agreements remain protected until expiry as already provided, and
- any changeover for renewals is implemented with clear advance notice and predictable methodology.

6) Transparency and governance: reported concerns and need for audits / disclosure (submitted as “reports and calls”, not as findings)

Given the magnitude of capacity-payment burdens documented by NEPRA, it is in the public interest to ensure maximum transparency in contract structures and cost components. Media reports have cited a 2020 committee report alleging irregularities and recommending forensic audits; the same reports note lack of follow-through. ([Business Recorder](#))

Additionally, parliamentary oversight discussions have called for forensic audits and greater transparency of IPP contracts and capacity charges. ([Business Recorder](#))

Request: NEPRA may consider strengthening disclosure requirements and coordinating with relevant institutions to ensure transparent auditability (including beneficial ownership disclosures and conflict-management safeguards), so that public confidence in tariff outcomes improves.

Closing

NEPRA’s own reporting shows that “Take-or-Pay” surplus and underutilization can impose large capacity-payment burdens and discourage renewables.

I respectfully request that prosumer rules be designed to protect non-prosumers through transparent fixed-cost recovery while sustaining rooftop solar adoption and providing predictable, bankable regulatory signals.

Thank you for your consideration.

Respectfully,

Ameen Sharif

CNIC: 42301-0754051-7

Phone: 0321-2437177

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 10:29 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Objection to the Government's proposed Net Billing Policy.

From: Muhammad Ali <aliali72@gmail.com>
Sent: Monday, January 12, 2026 11:08 AM
To: registrar@nepra.org.pk
Subject: Objection to the Government's proposed Net Billing Policy.

The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad, Pakistan

Respected Conocen Officer,

I write to register my strong objection to the Government's proposed Net Billing Policy as it applies to existing Net Metering consumers.

The proposed policy replaces the current Net Metering framework with a Net Billing mechanism that reduces the purchase rate for surplus electricity to PKR 27 per unit for existing consumers. This change forces prosumers to pay additional costs on off-peak units they generate, directly undermining the financial viability of solar investments made in good faith under NEPRA-approved Net Metering regulations.

Thousands of consumers installed solar systems based on approved payback periods, long-term financial planning, and clear government assurances promoting renewable energy. Applying this policy retrospectively is inequitable, violates legitimate expectations, and severely damages investor confidence in Pakistan's renewable energy sector.

The public hearing process for this policy allowed limited consumer participation, falling short of the transparency and inclusivity required for a policy of such significance.

If implemented, the policy will penalize early adopters, discourage future renewable investment, increase financial pressure on middle-income households, erode regulatory credibility, and conflict with national sustainability and climate objectives.

Accordingly, I strongly urge NEPRA to:

1. Exempt all existing Net Metering consumers from the proposed Net Billing Policy
2. Apply any revised framework only to future applicants, with a reasonable transition period
3. Conduct fresh, transparent public hearings with meaningful consumer participation
4. Publicly disclose the financial and economic justification for the proposed rates

I urge NEPRA to reconsider this policy in the broader national interest and to protect consumers who acted in full compliance with existing laws and regulations.

Thank You With Profound Regards.

Muhammad Ali
ConSumer # 1142070594

To,

Dated 12-01-2026

The Registrar,

NEPRA Islamabad,

**Subject: Objections to the Proposed Changes in Distributed Generation
Regulations**

Respected Registrar,

We are writing to voice our serious reservations regarding the proposed overhaul of the net-metering framework. While the government encourages a transition to "Green Energy," these new regulations create significant barriers for the very citizens who are footing the bill for this transition.

The most pressing concern is the shift toward a Gross Metering style philosophy, which devalues the clean energy we contribute to the national pool. By proposing a buyback rate that is significantly lower than the cost of grid power, NEPRA is effectively creating a "solar tax" on households. This move ignores the reality that prosumers have saved the government billions by reducing the need for expensive furnace oil and LNG imports during peak daylight hours. Shifting the financial goalposts now will discourage future investment and kill the momentum of a sector that saw a record 1.25 GWh of battery storage integration in 2024.

Furthermore, the proposed fixed monthly charges for solar users are discriminatory. Solar prosumers already pay significant upfront costs, including a 10% GST on components as per the latest budget, and they continue to pay grid taxes on any units they consume from the DISCOs. Adding an extra "fixed fee" simply for being connected to the grid penalizes efficiency and environment-friendly behavior. It is illogical to punish citizens for reducing their carbon footprint when the state is struggling to meet international climate commitments and grid modernization.

Lastly, the lack of transparency in how these new rates were calculated is troubling. Consumers need a stable and predictable regulatory environment to justify long-term investments. We suggest that instead of curbing solar exports, NEPRA should introduce Time-of-Use (ToU) incentives that encourage consumers to export power during the grid's most stressed periods. We request the Authority to withdraw these amendments and engage in a meaningful dialogue with consumer protection groups to find a solution that does not sacrifice the interests of the common man to protect the margins of inefficient power companies.

Yout Sincerely,

Asif mahmood

Chairman NEPA

From: Qaisar Mahmood <qaisarbwp@gmail.com>
Sent: Wednesday, January 7, 2026 7:09 PM
To: cad@nepra.org.pk
Cc: chairman@nepra.org.pk; registrar@nepra.org.pk; basitalvi@gmail.com
Subject: Application seeking direction to LESCO who is refusing to Accept Net Metering Application of the Applicant
Attachments: Letter to NEPA for Net Metering.pdf; Net Metering Application Summary.pdf; Authorization Letter from Arete Energy Pvt Ltd.pdf; NEPA Pay Order for DG Capacity Fee.pdf; NEPA Order to DISCOs.pdf

To
The DG Consumer Affairs Division,
NEPA, Islamabad

Please find enclosed herewith captioned application.

Regards,
Qaisar Mahmood
Authorized Representative of Arete Energy Pvt. Ltd.
for Brain Telecommunication Limited Net Metering Application
Mob: 0300 9499352
qaisarbwp@gmail.com

REGISTRAR OFFICE
Diary No: 673
Date: 12.1.26

Forwarded please:

<input checked="" type="checkbox"/> For Decision	<input type="checkbox"/> For Information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input checked="" type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C&M)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN
By No: 176
Date: 08-1-26

Ref: NEPRA/2025/1
Dated: 17/12/2025

To
The DG Consumer Affairs Division,
National Electric Power Regulatory Authority (NEPRA),
NEPRA Tower, Attaturk Avenue (East),
Sector G-5/1, Islamabad, Pakistan

Subject: Application seeking direction to LESCO with reference to
Accept Net Metering Application of the Applicant

Respected Sir,

1. That the applicant Brain Telecommunication Limited is a private company. The applicant in order to avail "Net Metering" under Net Metering Regulations, 2015 (as amended) filed application dated 25/11/2025 through Arete Energy (AEDB Licensee) with LESCO. LESCO has refused to entertain/accept the application on the reasons stated below by the applicant.
2. The applicant office and data center are located in Allama Iqbal Town, Lahore, which is under LESCO's jurisdiction. The applicant's estimated load is 151 kW for which the applicant requires 151 per kW DC Capacity under the existing regulations.
3. That NEPRA has already directed all the DISCOs to submit a detailed report regarding stoppage of registration of net metering applications by different DISCOs vide order no. TCD/1000/2025 dated 24/12/2025. This order has been mentioned to be treated as a binding order for all the DISCOs.
4. That the refusal by LESCO regarding net metering is against the order, notification or circular which is illegal. Without the order, notification or notification by the concerned authorities regarding stoppage of previous Net Metering Regulations, 2015, the same shall remain enforceable till date.

5. That refusal and intentional delay by LESCO Authority for entertaining the application of the applicant, without any lawful basis, constitute an arbitrary exercise of power, which is required to be restrained by this honorable forum.

PRAYER

In view of the above made submissions, it is respectfully prayed that appropriate directions may kindly be passed to LESCO for acceptance of net metering application of the applicant.

Applicant Details:

Name: Brain Telecommunication Ltd
through Basit Farooq Alvi
(Director at Brain Telecommunication Ltd)
0300 8451444 / basit@brain.net.pk

Address: 729 Nizam Block Allama Iqbal Town Lahore

Reference Number: 24 11233 0441600U

Sanctioned Load: 151 KW

Applied DG Facility: 150.930 KW

Sub Division: Canal Road

Division: Allama Iqbal

Kind regards,



Qaisar Mahmood

Authorized Representative of Arete Energy Pvt Ltd.

for Brain Telecommunication Limited

0300 9499352

qaisarbwpe@gmail.com

Encl:

1. Copy of Authorization Letter from Arete Energy Pvt Ltd
2. Copy of Application Summary dated 18/11/2025
3. Copy of Pay Order for NEPRA dated 25/11/2025 amounting to PKR 150,930.00/- (Applicable Fee for the DG Facility) required as per Schedule - V, Regulation 4(2) (C)
4. Copy of NEPRA Order No. TCD.10/56.34-2025 dated 21/12/2025

18-Nov-25

CLIENT INFORMATION

NAME

Brain Telecommunication Ltd C/O Basit Farooq Alvi

CNIC

35202-2390511-3

Address

729-730 Nizam Block Allama Iqbal Town Lahore

City

729-730 Nizam Block Allama Iqbal Town Lahore

Cell No.

+923008451444

Email

basitalvi@gmail.com

DCCO

LAHORE ELECTRIC SUPPLY COMPANY LESCO

Canal Road

ES

44 11233 0441600

3164738

Meter No.

2999014192

A-2C(06)T

A.Iqbal Town (018409

Sanctioned TP

151

150.930

150.930

RESIDENTIAL CONSUMPTION OF CLIENT

240,000

KWH PRODUCTION FROM SOLAR SYSTEM

182,500

57,500

Arete Energy (Private) Limited

4th Floor, 103, CCA-1, Sector C, Phase-6, DHA Lahore Cantonment

CR/25/153/C-2

Umer Anwar

Arete Energy (Private) Limited

34604-2984626-3

0316-4802967

talha.irshad@areteenergy.pk

SYSTEM INFORMATION

No. of Panels = 234

X Panel Voltage 645

Wp 150.930

No. of Inverters = 1

Longi Solar

LR7-72HVD 645M

Rated Capacity = 125

On-Grid



Hybrid



Make

Model

FOX

R125-G2

60RF124053XG015

For more than one make/model of panels on a single inverter, use this area to define the additional sub-panels

Make

Model

Wp

No. of Panels

No. of Inverters

Make

Model

Wp

No. of Panels

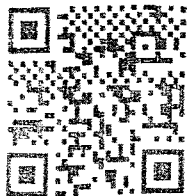
No. of Inverters

150.930

Application Form For NEM - V4.5

Prepared by Engr. Mubashir Gulina

(030453134-4)



U.C No. 05991537

1012532960242662
5991537

UNIVERSAL CHEQUE

101--HUNZA BLOCK A ITOWN LAHORE

25-11-2025

Or Order

NATIONAL ELECTRIC AND POWER REGULATORY AUTHORITY

PKR
150,930.00

One hundred fifty thousand nine hundred thirty and zero paisa only

Handwritten signature

Payable at any branch of BOP

Not Over Rs PKR: **150,930.00**

Valid for 6 months from the date of issuance, thereafter requires revalidation

⑈05991537⑈083010⑈00000000000000000000⑈010⑈

05991537

1012532960242662

25-11-2025

101--HUNZA BLOCK A ITOWN LAHORE

MR. MUHAMMAD LATIF KHALID

Chairman of Remittance TENDER

NATIONAL ELECTRIC AND POWER REGULATORY AUTHORITY

Instrument Number 5991537

Instrument Amount **150,930.00**

Total Amount **150,930.00**

Amount in words: One hundred fifty thousand nine hundred thirty and zero paisa only



National Electric Power Regulatory Authority
ISLAMIC REPUBLIC OF PAKISTAN
NEPRA TOWER
Attaturk Avenue (East) Sector G-5/1, Islamabad
Ph: 051-2013200, Fax: 051-2600021

**Consumer Affairs
Department**

TCD.10/ ⁵⁶³⁴ -2025
December 24, 2025

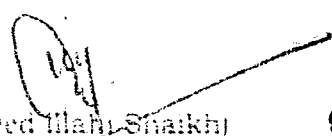
- 1) Chief Executive Officer, Faisalabad Electric Supply Company Limited (FESCO), Faisalabad.
- 2) Chief Executive Officer, Gujranwala Electric Power Company Limited (GEPCO), Gujranwala.
- 3) Chief Executive Officer, Hazara Electric Supply Company Limited (HAZECO), Abbottabad.
- 4) Chief Executive Officer, Hyderabad Electric Supply Company Limited (HESCO), Hyderabad.
- 5) Chief Executive Officer, Islamabad Electric Supply Company (IESCO), Islamabad.
- 6) Chief Executive Officer, Lahore Electric Supply Company Limited (LESCO), Lahore.
- 7) Chief Executive Officer, Multan Electric Power Company Limited (MEPCO), Multan.
- 8) Chief Executive Officer, Peshawar Electric Supply Company Limited (PESCO), Peshawar.
- 9) Chief Executive Officer, Quetta Electric Supply Company Limited (QESCO), Quetta.
- 10) Chief Executive Officer, Sukkur Electric Power Company Limited (SEPCO), Sukkur.
- 11) Chief Executive Officer, Tribal Electric Supply Company Limited (TESCO), Peshawar.
- 12) Chief Executive Officer, K-Electric Limited (KEL), Karachi.

MOST IMMEDIATE
FAX MESSAGE

Subject: NON ENTERTAINMENT OF NEW NET METERING APPLICATIONS
Misc. 41/12/2025

It has come to the notice of the Authority that a number of DISCOs have stopped registration of new net metering applications within their respective jurisdictions. The matter is of a serious concern and is in violation of applicable documents.

2. Foregoing in view, all the DISCOs are directed to submit a detailed report **within three (03) working days**, positively. This matter shall be treated as **Most Urgent**.


(Naweed Iqbal Shaikh)
Director General
Head of Consumer Affairs Deptt.

Copy to:

- 1) CSD, Faisalabad Electric Supply Company Limited (FESCO), Faisalabad.
- 2) CSD, Gujranwala Electric Power Company Limited (GEPCO), Gujranwala.
- 3) CSD, Hazara Electric Supply Company Limited (HAZECO), Abbottabad.
- 4) CSD, Hyderabad Electric Supply Company Limited (HESCO), Hyderabad.
- 5) CSD, Islamabad Electric Supply Company (IESCO), Islamabad.
- 6) CSD, Lahore Electric Supply Company Limited (LESCO), Lahore.
- 7) CSD, Multan Electric Power Company Limited (MEPCO), Multan.
- 8) CSD, Peshawar Electric Supply Company Limited (PESCO), Peshawar.
- 9) CSD, Quetta Electric Supply Company Limited (QESCO), Quetta.
- 10) CSD, Sukkur Electric Power Company Limited (SEPCO), Sukkur.
- 11) CSD, Tribal Electric Supply Company Limited (TESCO), Peshawar.
- 12) Mr. M. Imran Hussain Qureshi, Chief Regulatory Affairs & Govt. Relations Officer,
K-Electric Limited Office, 56 A, Street No. 88, G-6/3, Islamabad.
- 13) All NEPRA Regional Offices - (for follow-up with concerned DISCOs)

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 10:47 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Objections to Draft NEPRA

From: Saeed Siddiqui <saeedhussainsiddiqui@gmail.com>
Sent: Tuesday, January 13, 2026 8:54 AM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

“Misc.Charges” routinely added to electricity bills, which do not exist in the bills of any other electricity

distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Chairman NEPRA

From: dr.aurang zeb <zebdraurang@gmail.com>
Sent: Monday, January 5, 2026 12:18 PM
To: Chairman@nepra.org.pk

Net metering policy change. It is done to protect the IPP, but it can be against public interest & county interest, it is recommended to drop the new policy and continue the existing policy which will reduce the rates of electricity & will lead to industrialization/progress of country. Dr Aurangzeb

~~Registrar~~

②

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (e/RCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR
Diary No: 506
Date: 08/01/26

CHAIRMAN
By No. 55
Date: 05-01-26

Chairman NEPRA

From: Khalid Javed <khalidjaved49@gmail.com>
Sent: Monday, January 5, 2026 8:36 PM
To: Chairman@nepra.org.pk
Subject: NETIMETERING POLICY

Dear Sir Please do not change running Netmetering Policy.
This is requested to look into matter and resolve amicably that the policy to suit customers as well as
Disco's .
Best Regards
Engr KHALID JAVED

[Handwritten signature and initials]

Registrar

[Handwritten mark]

RECEIVED
269
9-1-26

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/Exec)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

[Handwritten signature]

REGISTRAR OFFICE
Dy No: 504
Date: 08/01/26

CHAIRMAN
Dy No: 92
Date: 06-01-26

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 9:27 AM
To: Shahid Farooque
Subject: Fwd: Net Metering-New Policy

----- Original Message -----

Subject: Fwd: Net Metering-New Policy
Date: 2026-01-09 09:16
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net Metering-New Policy
Date: 2026-01-09 09:11
From: akhtar mahmood <mahmood.amk856@gmail.com>
To: cad@nepra.org.pk

New policy on subject matter is unreasonable and unrealistic for those who spent huge amount of money on installation of solar panels.

Moreso, bringing old solar electricity consumers equal to new/fresh consumers is unjustified.

Keeping above in view, it is suggested that DIFFERENCE IN BUYING AND SELLING ie EXPORT AND IMPORT SHOULD BE BROUGHT/FIXED TO HALF.

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 9:28 AM
To: Shahid Farooque
Subject: Fwd: New net metering policy.

----- Original Message -----

Subject: Fwd: New net metering policy.
Date: 2026-01-09 09:16
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----


Subject: New net metering policy.
Date: 2026-01-09 07:16
From: Mudassir Hussain <mudassir.hussain1960@yahoo.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Dear sir,

I suggest to please reconsider unilateral net metering policy. It will not only hurt users but electric companies so also service providers in the sector.

Moreover the agreements already executed for a fix period and now revisited and refixed without consent of 2nd party. Such acts have a history of bad consequences in Business, secio politically and morality. It hurts the trust and affection for State and society towards masses.

Regards
Malik Mudassar Hussain
H.no 756 G-14/4
Islamabad
#03353036774

 Yahoo Mail: Search, organise, conquer [1]

Links:

[1]
https://mail.onelink.me/107872968?pid=ativeplacement&c=US_Acquisition_YMktg_315_SearchOrgConquer_EmailSignature&af_sub1=Acquisition&af_sub2=US_YMktg&af_sub3=&af_sub4=100002039&af_sub5=C01_Email_Static_&af_ios_store_cpp=0c38e4b0-a27e-40f9-a211-f4e2de32ab91&af_android_url=https://play.google.com/store/apps/details?id=com.yahoo.mobile.client.android.mail&listing=search_organize_conquer

--

Regards

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 9:28 AM
To: Shahid Farooque
Subject: Fwd: Strong Objection to Proposed Net Billing Policy and Request for Protection of Existing Net Metering Consumers

----- Original Message -----

Subject: Fwd: Strong Objection to Proposed Net Billing Policy and Request for Protection of Existing Net Metering Consumers
Date: 2026-01-09 09:16
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>



----- Original Message -----

Subject: Strong Objection to Proposed Net Billing Policy and Request for Protection of Existing Net Metering Consumers
Date: 2026-01-09 07:03
From: RenewableEngineeringSolutions <info.ressolar@gmail.com>
To: cad@nepra.org.pk
Copy: chairman@nepra.org.pk

To
The Chairman
National Electric Power Regulatory Authority (NEPRA) Islamabad, Pakistan

Subject: Strong Objection to Proposed Net Billing Policy and Request for Protection of Existing Net Metering Consumers

Respected Sir,

I am writing to express my serious concern and strong objection to NEPRA's proposed Net Billing Policy, scheduled to be implemented with effect from 14 January 2026, as published on NEPRA's website.



The proposed policy effectively ends Net Metering and replaces it with a Net Billing mechanism that is financially detrimental to electricity consumers who invested in renewable energy in good faith, based on the existing regulatory framework. The drastic reduction in the purchase rate—Rs. 11.5 per unit for new consumers and Rs. 27 per unit for existing consumers—fundamentally alters the economic viability of solar investments.

Thousands of consumers installed solar systems after making long-term financial commitments, relying on NEPRA-approved Net Metering regulations, approved payback periods, and government encouragement of renewable energy. Retrospective application of this policy to existing licensees is unjust, violates legitimate consumer expectations, and severely undermines investor confidence in Pakistan's renewable energy sector.

Additionally, the public hearing process for this policy was conducted with restricted participation, which limited meaningful consumer representation. Such a significant policy shift warrants broad, transparent, and inclusive stakeholder consultation.

• This policy will:

- * Penalize early adopters of clean energy
- * Discourage future investment in renewable generation
- * Increase financial burden on middle-income households
- * Damage trust in regulatory stability
- * Contradict national goals of energy sustainability and climate resilience

In light of the above, I respectfully request NEPRA to:

1. Completely exempt all existing Net Metering consumers from the proposed Net Billing Policy 2. Apply any new framework only to future applicants, with adequate transition time 3. Re-conduct public hearings with open and meaningful consumer participation 4. Publish a transparent financial and economic justification for the proposed rates

I urge NEPRA to reconsider this policy in the larger national interest and protect consumers who acted responsibly and in accordance with prevailing laws and regulations.

I hope NEPRA will uphold fairness, regulatory consistency, and consumer confidence.

Yours sincerely,



Engr Atif
City: Islamabad
Contact: +92316-5680196

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 9:28 AM
To: Shahid Farooque
Subject: Fwd: COMMENTS ON NEPRA (Prosumer) Regulations, 2025

----- Original Message -----

Subject: Fwd: COMMENTS ON NEPRA (Prosumer) Regulations, 2025
Date: 2026-01-09 09:17
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: COMMENTS ON NEPRA (Prosumer) Regulations, 2025
Date: 2026-01-09 02:17
From: Asad Ali <asadthisside@gmail.com>
To: cad@nepra.org.pk, Registrar@nepra.org.pk, Chairman@nepra.org.pk

PUBLIC COMMENTS ON

NEPRA (Prosumer) Regulations, 2025

Submitted by: An Individual Household Prosumer

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into millions of rupees, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering.

This investment was made in good faith with the understanding that:

*

solar would reduce my long-term electricity bills,

*

excess electricity exported to the grid would be fairly valued, and

*

the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

*

this removes any certainty of cost recovery,

*

makes long-term financial planning impossible, and

*

converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are long-term household infrastructure investments. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

*

breaks public trust,

*

violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,

*

discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

*

households bear all capital, maintenance, and compliance costs,

*

distribution companies can limit or curtail exports,

*

yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

*

the household carries all financial risk,

*

the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are not wealthy investors. They are middle-income families trying to:

*

protect themselves from rising electricity tariffs,

*

Reduce load-shedding exposure,

*

contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

*

how export rates were determined,

*

whether savings from reduced fuel imports were considered,

*

how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

*

Protect Existing Household Prosumers All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.

*

No Mid-Term Changes to Buy-Back Rates Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.

*

Fair and Transparent Valuation Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.

*

Clear Policy for Future Installations Only If changes are necessary, they should apply only to future applicants, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure fairness, predictability, and protection for household prosumers who invested in good faith.



Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 9:28 AM
To: Shahid Farooque
Subject: Fwd: Formal Protest Against Proposed NEPRA (Prosumer) Regulations, 2025 – Demand to Fully Exempt Existing Net Metering Consumers

----- Original Message -----

Subject: Fwd: Formal Protest Against Proposed NEPRA (Prosumer) Regulations, 2025 – Demand to Fully Exempt Existing Net Metering Consumers
Date: 2026-01-09 09:17
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>



----- Original Message -----

Subject: Formal Protest Against Proposed NEPRA (Prosumer) Regulations, 2025 – Demand to Fully Exempt Existing Net Metering Consumers
Date: 2026-01-09 01:38
From: Bilal Chaudhry <bilal.chaudhry@baltoro.io>
To: registrar@nepra.org.pk, Chairman@nepra.org.pk, cad@nepra.org.pk

Dear Registrar and Chairman NEPRA,

I am writing to formally record my strong objection to the draft NEPRA (Prosumer) Regulations, 2025, which propose replacing the existing Net Metering framework with a Net Billing mechanism.

As an existing net metering licensee under the 2015 Regulations, I made substantial investments in solar generation based on the prevailing 1:1 offset at retail tariff rates and a reasonable payback period. The proposed shift to Net Billing billing imports at full retail tariff while crediting exports at a significantly lower rate (around Rs. 11-13 per unit for new users) constitutes a retroactive alteration if applied to existing consumers upon contract expiry or otherwise.

Applying these changes to existing licensees undermines legitimate expectations, causes severe financial detriment to investors who relied on the original policy, and risks eroding public trust in renewable energy incentives.

Moreover, the rapid growth of Pakistan's solar industry including manufacturing, installation, and related jobs depends heavily on the stability of the existing Net Metering policy for current users. Any retroactive or transitional application threatens the sector's viability, leading to reduced investments and potential job losses.

I strongly urge NEPRA to:

1. Fully exempt all existing net metering consumers from the new Prosumer Regulations, allowing them to continue indefinitely under the 2015 Net Metering framework.
2. Reject any reduction in export credits or shift to Net Billing for pre-existing installations.
3. Ensure inclusive stakeholder consultation before finalizing the regulations.

Please record this as formal comments in opposition to the draft.

Failure to protect existing investments will discourage future renewable adoption and harm Pakistan's clean energy goals.

Thank you for considering this submission.

Sincerely,
Bilal Chaudhry
Sargodha, Pakistan
Date: January 09, 2026

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 9:29 AM
To: Shahid Farooque
Subject: Fwd: Objection to Proposed Net Billing Policy for Existing & New Consumers

----- Original Message -----

Subject: Fwd: Objection to Proposed Net Billing Policy for Existing & New Consumers
Date: 2026-01-09 09:18
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objection to Proposed Net Billing Policy for Existing & New Consumers
Date: 2026-01-08 22:50
From: TieRays Solar Energy <tieraysolar@gmail.com>
To: cad@nepra.org.pk, Chairman@nepra.org.pk, registrar@nepra.org.pk

Dear Sir,

I would like to strongly object to the proposed Net Billing Policy replacing the current Net Metering system.

This policy will negatively affect both existing and new solar consumers. Existing users invested under the Net Metering framework in good faith, while the proposed low purchase rate for new consumers will discourage future solar adoption in Pakistan.

I respectfully request NEPRA to:

- Exempt existing Net Metering users from the new policy, and
- Reconsider and revise the proposed purchase rate for new consumers.

Kindly protect consumer confidence and support sustainable renewable energy growth.

Regards,
CEO TieRays Solar Energy (Mansoor Khan)

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 9:31 AM
To: Shahid Farooque
Subject: Fwd: CHANGE IN TARIFF FOR NET METERING POLICY

----- Original Message -----

Subject: Fwd: CHANGE IN TARIFF FOR NET METERING POLICY
Date: 2026-01-09 09:19
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: CHANGE IN TARIFF FOR NET METERING POLICY
Date: 2026-01-08 19:16
From: Fayyaz Rasool Khan <gaszonecng@gmail.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

To: The Registrar, NEPRA / Chairman, NEPRA

From: FAYYAZ RASOOL KHAN

Reference: Draft NEPRA Prosumer Regulations 2025

Date: January 8, 2026

Respected Authority,

I am writing to express my strong reservations and formal protest regarding the proposed transition from the current Net Metering regime to the "Net Billing" system (Prosumer Regulations 2025), scheduled for implementation around January 14, 2026.

As a solar energy consumer (Prosumer) who invested significant capital in rooftop solar based on the government's 2015 Net Metering policy, I find the following proposed changes highly detrimental:

- * Breach of Contractual Trust: Existing users installed systems with a 7-year agreement and a specific "one-to-one" unit credit expectation. Changing the rules mid-way or forcing old users onto a significantly lower buy-back rate (Rs. 27 vs the retail rate of Rs. 60+) is a breach of the investment security promised by the state.

- * Unfair Pricing (Rs. 11.5 for New Users): The proposed rate of Rs. 11.5 per unit for new users is far below the cost of generation and the retail price of electricity. This will discourage the adoption of renewable energy, contradicting Pakistan's commitments to the Paris Agreement and the Alternative Energy Policy.

- * Sanctioned Load Restrictions: Limiting solar capacity to 100% of the sanctioned load prevents consumers from future-proofing their energy needs and penalizes those trying to contribute more green energy to the national grid.

- * Lack of Public Participation: It is observed that the hearing process was not inclusive of the wider consumer base. A policy of this magnitude requires a transparent, nationwide debate.

My Demands:

* Grandfathering Clause: Existing Net Metering licensees must be fully exempted from the new policy for the entire duration of their current licenses.

* Revision of Buy-back Rates: The export rate for new users should be linked to the "National Average Purchase Price" (NAPPP) and adjusted for inflation, rather than being fixed at an unsustainable low rate.

* Stay of Implementation: I urge NEPRA to delay the January 14th implementation until a meaningful consultation with all stakeholders is concluded.

I request that this complaint be made part of the official record and that NEPRA reconsider these measures to protect the interests of the common consumer.

Sincerely,

FAYYAZ RASOOL KHAN

1730115889223

DHA PHASE 5

LAHORE, PUNJAB.

03218500885

Get Outlook for Android [1]

Links:

[1] <https://aka.ms/AAb9ysg>

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 9:31 AM
To: Shahid Farooque
Subject: Fwd: Dear Respected Sir i m strongly oppose NEPRA's proposed Net Billing Policy effective 14 Jan 2026. Applying it to existing net metering consumers is unfair and retrospective. Existing users must be exempted, and purchase rates revised to protect renew

----- Original Message -----

Subject: Fwd: Dear Respected Sir i m strongly oppose NEPRA's proposed Net Billing Policy effective 14 Jan 2026. Applying it to existing net metering consumers is unfair and retrospective. Existing users must be exempted, and purchase rates revised to protect renewable energy investment and consumer confidence.

Date: 2026-01-09 09:19

From: cad@nepra.org.pk

To: Zabihullah <zabihullah@nepra.org.pk>

Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Dear Respected Sir i m strongly oppose NEPRA's proposed Net Billing Policy effective 14 Jan 2026. Applying it to existing net metering consumers is unfair and retrospective. Existing users must be exempted, and purchase rates revised to protect renewable energy investment and consumer confidence.

Date: 2026-01-08 21:08

From: Waseel 782 <waseel782@gmail.com>

To: cad@nepra.org.pk

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 9:31 AM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2026-01-09 09:18
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>


----- Original Message -----

Subject:
Date: 2026-01-08 22:22
From: Muhammad Waheed <aaripiara@gmail.com>
To: cad@nepra.org.pk

It is very injustice for old consumers they will not sit back at all they will want to to continue their 7 years old agreement with old rates untill 7 years expiry of their licenses Now for new consumers only 11 rupees export rate is just pathetic as 10kw ongrid system installation cost is almost 9 lac and on average it produced 1000 a month,mean it will recover only 110000 rupees in one year and new license will be for only five years so in 5 years consumer will recover only 550000 rupees out of 9 lac which is hopeless

Mean a consumer will have to install 50 to 60kw system for minus bill which 10kw was doing for him So it will hit hard to wapda also as mostly solar users will go to hybrid system so they will not export to wapda at all and ultimately water conditions in the dams electricity production will be reduced to minimum

--
Regards


Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 9:29 AM
To: Shahid Farooque
Subject: Fwd: Objections to Proposed Net Billing Policy – Request for Exemption of Existing Net-Metering Licensees

----- Original Message -----

Subject: Fwd: Objections to Proposed Net Billing Policy – Request for Exemption of Existing Net-Metering Licensees
Date: 2026-01-09 09:18
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Fwd: Objections to Proposed Net Billing Policy – Request for Exemption of Existing Net-Metering Licensees
Date: 2026-01-08 21:23
From: attorneyabid@icloud.com
To: cad@nepra.org.pk

Sent from my iPhone

Begin forwarded message:

> From: attorneyabid@icloud.com
> Date: 8 January 2026 at 9:19:29 PM GMT+5
> To: Chairman@nepra.org.pk
> Subject: Objections to Proposed Net Billing Policy – Request for
> Exemption of Existing Net-Metering Licensees

>

> To:

>

> The Registrar

>

> National Electric Power Regulatory Authority [1] (NEPRA)

>

> Islamabad

>

> Respectfully submitted:

>

> * That the undersigned consumer objects to the proposed Net Billing
> Policy, particularly its application to existing net-metering
> licensees, which amounts to retrospective deprivation of vested
> rights.

> * That existing net-metering consumers made substantial capital

- investments in reliance upon a clear regulatory framework approved and
 - > promoted by NEPRA itself. Any unilateral alteration mid-stream
 - > violates the settled doctrines of legitimate expectation, promissory
 - > estoppel, and regulatory certainty.
 - > * That the proposed differential purchase rates—Rs. 27/unit for
 - > existing users and Rs. 11.5/unit for new users are arbitrary,
 - > confiscatory, and bear no rational nexus to, avoided fuel costs;
 - > reduced transmission losses; peak load shaving; or foreign exchange
 - > savings.
 - > * That the so-called public hearing was conducted with restricted and
 - > selective participation, defeating the spirit of transparent
 - > stakeholder consultation required of an independent regulator.
 - > * That rooftop solar is not a luxury but a consumer response to
 - > systemic grid failure, excessive tariffs, and load uncertainty, and
 - > penalising it will discourage future renewable adoption; increase grid
 - > stress, and; undermine Pakistan's climate and energy security
 - > commitments.
 - >
 - > PRAYER

- It is therefore respectfully requested that NEPRA:
 - >
 - > a) Fully exempt existing net-metering licensees from the proposed Net
 - > Billing Policy for the life of their systems;
 - >
 - > b) Apply any revised framework prospectively only, after meaningful
 - > consultation; and
 - >
 - > c) Reconsider buy-back rates on a cost-reflective and non-punitive
 - > basis.
 - >
 - > Any policy imposed without addressing these concerns shall remain
 - > vulnerable to legal challenge.
 - >
 - > Abid Hussain
 - >
 - > Advocate High Court
 - > Islamabad.
 - >
 - > Sent from my iPhone

Links:

 [1] chatgpt://generic-entity?number=0

--
 Regards

Lashkar Khan Qambrani

Net Metering

Dated: 29 December 2025

The Consumer Affairs Division
National Electric Power Regulatory Authority (NEPRA)
Islamabad

**Subject: COMPLAINT UNDER NEPRA CONSUMER AFFAIRS REGULATIONS
REGARDING IMPLEMENTATION OF NEW SOLAR NET METERING / NET
BILLING POLICY**

I am a registered Solar Net Metering consumer operating under a valid approval / license issued pursuant to the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. My particulars are provided below for official record:

Consumer Information:

Name: Mrs Waheeda Arshad
Postal Address: House No 38, street 60, Sector F-11/4, Islamabad
Distribution Company (DISCO): IESCO
Net Metering License No./ Reference No.: 1140053258

Registrar
Billing

Through this submission, I hereby lodge a **formal complaint** under NEPRA's Consumer Affairs framework against the recently notified **Solar Net Metering / Net Billing Policy**, on the following legal and regulatory grounds:

1. The new policy adversely affects existing net metering consumers who made capital investments based on the earlier notified regulations, approved tariffs, and legally executed agreements.
2. The retrospective or altered application of revised billing mechanisms undermines the principle of regulatory certainty and legitimate consumer expectation.
3. The policy materially changes the financial and commercial terms under which net metering licenses were granted, without adequate consumer consultation or transitional protection.
4. The revised framework discourages distributed generation and contradicts the objectives of renewable energy promotion, consumer protection, and sustainable power sector development.

It is respectfully submitted that all existing net metering consumers entered into binding agreements in good faith, relying on the continuity and stability of NEPRA's approved regulatory regime. Any unilateral modification impacting existing license holders raises serious consumer protection and regulatory compliance concerns.

Relief Sought:

In view of the above, I respectfully request NEPRA to:

- a) Safeguard the rights of existing net metering consumers by exempting them from the application of the new policy;
- b) Review the notified policy through due stakeholder consultation in accordance with best regulatory practices; and
- c) Ensure that any future regulatory changes are prospective in nature and compliant with consumer protection principles.

I request that this complaint be registered, acknowledged, and processed under NEPRA Consumer Affairs procedures, and I may be informed of the outcome accordingly.

Yours sincerely,

Name: Mrs Waheeda Arshad

Signature: Mrs Waheeda Arshad

For information & a.n. please.

(Sd/-)

(Sd/-)

(Sd/-)

(Sd/-)

CC: Chairman

(Sd/-)

Copy for information to Sub Divisional SDO IESCO Islamabad.

1.1.26
33

DG (Lic)

30-12-25

30-12-25



WAFAQI MOHTASIB (OMBUDSMAN)'S SECRETARIAT
36-Constitution Avenue, G-5/2, Islamabad
Phone: 051-9213886-7, Helpline: 1055 Fax: 051-9217224

Case No. WMS-HQR/0011183/25

Date: 31 December 2025

To

The Registrar
National Electric Power Regulatory Authority
NEPRA Tower Attaturk Avenue (East)
Sector G-5/1, Islamabad
051-2013200

Deputy Registrar
Wafaqi Mohtasib (Ombudsman)
Islamabad

Subject: REQUEST FOR ACTION

As the office of Wafaqi Mohtasib (Ombudsman) has been set up under the President's Order No.1 of 1983 to diagnose, investigate, redress and rectify any injustice done to a person through mal-administration and whereas Article 33 of the said order empowers the Mohtasib and a member of the staff of his Secretariat to informally conciliate, amicably resolve, stipulate, settle or ameliorate any grievance without written memorandum and without the necessity of docketing any complaint or issuing any official notice, therefore, the petition of MUHAMMAD ADIL RASHEED r/o HOUSE NO 170-7 SARWAR LINE SARWR ROAD SADDAR, RAWALPINDI on the subject REQUEST FOR ACTION is sent to you for your prompt, kind and sympathetic consideration.

2. This office may kindly be informed of the action taken by you.

BY ORDER OF THE HONOURABLE WAFAQI MOHTASIB.

Assistant Registrar

Copy to: MUHAMMAD ADIL RASHEED
HOUSE NO 170-7 SARWAR LINE SARWR ROAD SADDAR DISTT RAWALPINDI
03005185667

Forwarded please:

☒ For mng. action ☐ For information

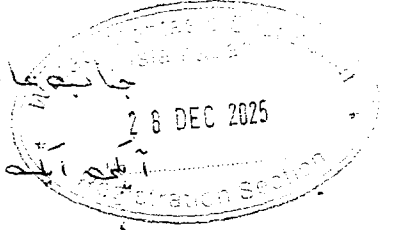
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. I.T.
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

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خدمت جنابہ رفاقتی تحسبہ اعلیٰ صاحبہ



جانبہ عیالت: نوڈیا نہ گزراش ہے میں ایک عام شہری ہوں میں
 ایک ایک ایم شیلے کی طرف سے توجہ مبذول کروانا چاہتا ہوں میرے پاس
 کوئی اور فورم نہیں ہے جہاں مجھے انصاف مل سکے۔ حضرت علیؑ نے فرمایا
 کہ جس معاشرے میں انصاف نہیں ہوگا وہ معاشرہ تباہ ہو جائے گا
 جنابہ عالی میں نے لوگوں سے اُدھار لیکر اپنے گھر سولر سٹم لگایا
 کیونکہ بجلی کے بن دینا مشکل ہو گیا تھا اب یہ خبر ہے کہ سولر والوں کو
 کوئی غائدہ نہیں ہوگا پہلے گورنمنٹ کہہ دی تھی کہ سولر لگائیں اسی طرح
 پہلے ہی اپنے جہے کا کہا بعد میں اُس کا پیڑہ خرق کر دیا اگر اسی طرح گورنمنٹ
 اپنے وعدوں سے ٹکرتی رہے تو آئندہ کوئی گورنمنٹ کی باتوں پر یقین کرے گا
 اسی لیے عوام دن بدن انہ لوگوں سے بدظن ہو رہی ہے۔ آپلی وجہ سے کچھ امید
 ہے کہ سولر والوں کی رعایت برقرار رہے۔ اگر حکومت اسے بند کرنا چاہتی ہے
 تو ابہ یا بندی لگا دیں کہ آجکے بعد نئے سولر لگانے والوں کو رعایت نہیں ملے گی
 لگے دیکھ جائیں گے ابہ میرے جو پیڑہ لاکھ لگائے ہیں اُسکا کون ذمہ دار ہے
 یہ تو میرے پیڑہ لاکھ والپس کیے جائیں یا ہمیں پیرافٹ سہولت پر برقرار رکھا جائے
 یہ میرے کہنے کا مسئلہ نہیں ہے۔ ۱۵ فیصد لوگوں نے سولر لگایا ہے انہ سب کا قصور
 کیا ہے۔ آپہ سے درخواست گزرا ہو کہ واپڈا اور پیسرا کو حکم دیں کہ اگر آپ
 نے نئے پالپس بنائے تو اعلان کر دیں کہ ابہ کوئی سولر نہ لگائے جہوں نے پہلے
 لگا لیے ہیں انہیں پیرافٹ سہولت ملے رہے گی۔

الحرفہ

محمد عادل رشید

مکان نمبر ۱۶۵-۷ سرور لین۔ سرور روڈ

صدر لیٹسٹ۔ ڈاؤنٹن

شناختہ کارڈ نمبر ۹-۳۱۹۹۹۱-۳۶۹۵۵

۵۳۵۵۵۱۵۵۶۶۷

Adil Rashid

23.12.2025


Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Thursday, 8 January, 2026 12:49 PM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2026-01-08 09:33
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

 Subject:
Date: 2026-01-07 16:50
From: Samia Zia <samiazia102@gmail.com>
To: cad@nepra.org.pk, Chairman@nepra.org.pk


SUBJECTION: OBJECTION TO PROPOSED CONSUMER REGULATIONS 2025

To: The Registrar, NEPRA

As a domestic solar consumer in Islamabad, I strongly object to the proposed 2025 regulations. I invested PKR __1.7__ Million of my personal savings based on the government's commitment to net-metering. My system still requires 3 more years to break even; any shift to "Gross Metering" or lower buy-back rates now would cause me an irreparable financial loss.

Key Concerns:

Retrospective Penalties: Changing rules mid-contract violates "Vested Rights" and the principle of legitimate expectation.

 *Economic Injustice:* Households bear 100% of the maintenance and capital risks while providing the grid with cheap, clean energy during peak hours.

Breach of Trust: Penalizing early adopters discourages future renewable energy transition and undermines regulatory credibility.

My Demands:

Mandatory Grandfathering: All existing net-metering users must be legally protected under their original terms for the full duration of their agreements.

Exemption from Gross Metering: Existing systems, designed for "Net" exchange, must not be forced into a "Gross" framework.

Prospective Policy Only: Any restrictive changes must apply only to new applicants who have not yet invested their capital.

NEPRA must protect individual citizens from arbitrary policy shifts that favor utility companies over household investors.

Respectfully,

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Thursday, 8 January, 2026 12:49 PM
To: Shahid Farooque
Subject: Fwd: Exemption of Old Licenses

----- Original Message -----

Subject: Fwd: Exemption of Old Licenses
Date: 2026-01-08 09:28
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Exemption of Old Licenses
Date: 2026-01-07 22:52
From: Hamayun Khan <drhamayun1@gmail.com>
To: cad@nepra.org.pk

I Do not Agree with the New Policy. Please Exempt Old Licenses from New policy.

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

The Registrar,
National Electric Power Regulatory Authority (NEPRA)

Subject: **OBJECTION TO THE PROPOSED PROSUMER REGULATIONS 2025**

I am a domestic solar prosumer under Multan Electric Power Company (MEPCO), Consumer Number 22154190698836, residing at House No. 183, Gulberg Colony, near Maqbool Colony, Bahawalpur. I respectfully submit my strong objection to the proposed Prosumer Regulations 2025.

I invested a substantial amount of my personal savings to install a rooftop solar system based on the Government of Pakistan's clearly articulated policy and regulatory framework for net metering. This investment decision was made in good faith, relying on the assurances provided by NEPRA and the relevant distribution company. My system has not yet reached its break-even point and still requires several years to recover the invested capital. Any unilateral shift at this stage towards gross metering or a significant reduction in buy-back rates would result in serious and irreparable financial loss.

Altering the regulatory framework retrospectively amounts to penalizing consumers who complied with the law and invested under existing rules. Such changes undermine the concepts of vested rights and legitimate expectation, which are fundamental principles of administrative fairness. As prosumers, we bear the full cost of capital, maintenance, and operational risks, while simultaneously contributing clean and affordable electricity to the national grid, particularly during peak daylight hours. Penalizing this contribution creates economic injustice and discourages responsible citizen investment.

Any action that adversely affects existing prosumers also represents a breach of regulatory trust. Early adopters of renewable energy responded to national energy goals and policy incentives. Subjecting them to unfavorable changes after investment damages confidence in regulatory institutions and will inevitably discourage future participation in renewable energy initiatives, directly contradicting national sustainability objectives.

I therefore respectfully urge NEPRA to ensure that all existing net-metering consumers are fully protected under the terms and conditions applicable at the time of their interconnection for the complete duration of their agreements. Existing installations, which were designed and financially modeled on a net-metering basis, should not be compelled to shift to a gross-metering regime. Any proposed restrictive or revised framework should be applied strictly on a prospective basis and only to new applicants who have not yet made financial commitments.

NEPRA is expected to act as an independent regulator that safeguards the interests of individual consumers and protects them from arbitrary policy shifts that disproportionately benefit distribution companies at the expense of household investors who supported national energy policy in good faith.

Respectfully submitted,

Muhammad Munawar Ahmed
Consumer Number: 22154190698836
House No. 183, Gulberg Colony,
Near Maqbool Colony,
Bahawalpur

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 10:31 AM
To: Shahid Farooque
Subject: Fwd: SUBJECTION: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025*

----- Original Message -----

Subject: Fwd: SUBJECTION: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025*

Date: 2026-01-07 10:13

From: cad@nepra.org.pk

To: Zabihullah <zabihullah@nepra.org.pk>

Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: SUBJECTION: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025*

Date: 2026-01-07 02:35

From: Muhammad Rizwan Khan <rizwank396@gmail.com>

To: cad@nepra.org.pk

SUBJECTION: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025

To: The Registrar, NEPRA

As a domestic solar prosumer in Islamabad, I strongly object to the proposed 2025 regulations. I invested PKR _____ Million of my personal savings based on the government's commitment to net-metering. My system still requires 3 more years to break even; any shift to "Gross Metering" or lower buy-back rates now would cause me an irreparable financial loss.

Key Concerns:

Retrospective Penalties: Changing rules mid-contract violates "Vested Rights" and the principle of legitimate expectation.

Economic Injustice:

 Households bear 100% of the maintenance and capital risks while providing the grid with cheap, clean energy during peak hours.

Breach of Trust:

 Penalizing early adopters discourages future renewable energy transition and undermines regulatory credibility.

My Demands:

Mandatory Grandfathering: All existing net-metering users must be legally protected under their original terms for the full duration of their agreements.

Exemption from Gross Metering:

 Existing systems, designed for "Net" exchange, must not be forced into a "Gross" framework.

Prospective Policy Only: Any restrictive changes must apply only to new applicants who have not yet invested their capital.

NEPRA must protect individual citizens from arbitrary policy shifts that favor utility companies over household investors.

Respectfully,

[Muhammad Rizwan Akram]

Consumer ID: [22151111194601]

Address: [Multan]

Contact no: 03026956676

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 10:32 AM
To: Shahid Farooque
Subject: Fwd: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025

----- Original Message -----

Subject: Fwd: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025
Date: 2026-01-07 10:14
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Object: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025
Date: 2026-01-07 00:15
From: Ali Ubaid <alibinubaid@gmail.com>
To: cad@nepra.org.pk
Copy: chairman@nepra.org.pk

To: The Registrar, NEPRA

As a domestic solar prosumer in Bahawalpur, I strongly object to the proposed 2025 regulations. I invested PKR 1.1 Million Rupees from my personal savings based on the government's commitment to net-metering. My system still requires 6 more years to break even; any shift to "Gross Metering" or lower buy-back rates now would cause me an irreparable financial loss.

Key Concerns:

Retrospective Penalties: Changing rules mid-contract violates "Vested Rights" and the principle of legitimate expectation.

Economic Injustice: Households bear 100% of the maintenance and capital risks while providing the grid with cheap, clean energy during peak hours.

Breach of Trust: Penalizing early adopters discourages future renewable energy transition and undermines regulatory credibility.

My Demands:

Mandatory Grandfathering: All existing net-metering users must be legally protected under their original terms for the full duration of their agreements.

Exemption from Gross Metering: Existing systems, designed for "Net" exchange, must not be forced into a "Gross" framework.

Prospective Policy Only: Any restrictive changes must apply only to new applicants who have not yet invested their capital.

NEPRA must protect individual citizens from arbitrary policy shifts that favor utility companies over household investors.

Respectfully,

Ali bin Ubaid

Consumer ID: 22154110047301

Address: House no 763, Islampura, Bahawalpur

On Wed, Jan 7, 2026, 12:11 AM Ali Ubaid <alibinubaid@gmail.com> wrote:

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 10:32 AM
To: Shahid Farooque
Subject: Fwd: OBJECTION TO THE PROPOSED PROSUMER REGULATIONS 2025
Attachments: NEPRA APPEAL.pdf

----- Original Message -----

Subject: Fwd: OBJECTION TO THE PROPOSED PROSUMER REGULATIONS 2025
Date: 2026-01-07 10:14
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: OBJECTION TO THE PROPOSED PROSUMER REGULATIONS 2025
Date: 2026-01-07 00:14
From: Muhammad Munawar Ahmed <munawar69@iub.edu.pk>
To: cad@nepra.org.pk, Registrar@nepra.org.pk, Chairman@nepra.org.pk

Dear Sir,

I hope this email finds you in good health. I am writing to formally submit my objection to the proposed policy changes concerning solar prosumers, which have serious financial and legal implications for existing consumers who invested in good faith under the prevailing regulatory framework.

Kindly find attached the detailed formal appeal outlining my concerns and submissions for your careful review and consideration. I respectfully request that the issues raised therein be duly examined to ensure fairness, regulatory certainty, and protection of consumer rights.

Thank you for your time and attention to this important matter

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 10:32 AM
To: Shahid Farooque
Subject: Fwd: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025

----- Original Message -----

Subject: Fwd: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025
Date: 2026-01-07 10:15
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----


 Subject: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025
Date: 2026-01-06 23:38
From: Nazir Rana <nazeerrana@gmail.com>
To: registrar@nepra.org.pk, chairman@nepra.org.pk, cad@nepra.org.pk

As a domestic solar prosumer in Bahawalpur, I strongly object to the proposed 2025 regulations. I invested PKR 1Million of my personal savings based on the government's commitment to net-metering. My system still requires 3 more years to break even; any shift to "Gross Metering" or lower buy-back rates now would cause me an irreparable financial loss.

Key Concerns:

Retrospective Penalties: Changing rules mid-contract violates "Vested Rights" and the principle of legitimate expectation.

Economic Injustice: Households bear 100% of the maintenance and capital risks while providing the grid with cheap, clean energy during peak hours.

 Reach of Trust: Penalizing early adopters discourages future renewable energy transition and undermines regulatory credibility.

My Demands:

Mandatory Grandfathering: All existing net-metering users must be legally protected under their original terms for the full duration of their agreements.

Exemption from Gross Metering: Existing systems, designed for "Net" exchange, must not be forced into a "Gross" framework.

Prospective Policy Only: Any restrictive changes must apply only to new applicants who have not yet invested their capital.

NEPRA must protect individual citizens from arbitrary policy shifts that favor utility companies over household investors.

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 10:32 AM
To: Shahid Farooque
Subject: Fwd: Serious Concerns and Formal Objection Regarding Proposed Net Billing Policy

----- Original Message -----

Subject: Fwd: Serious Concerns and Formal Objection Regarding Proposed Net Billing Policy
Date: 2026-01-07 10:16
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Serious Concerns and Formal Objection Regarding Proposed Net Billing Policy
Date: 2026-01-06 21:10
From: huzaifa adrees <huzaifaadrees@gmail.com>
To: cad@nepra.org.pk

Respected Chairman NEPRA / Registrar NEPRA, With due respect, this email is being written to formally convey the deep concern, anxiety, and strong reservations of a large number of existing and prospective distributed solar energy consumers regarding the proposed Net Billing Policy, reportedly scheduled for implementation with effect from 14 January 2026.

While we fully acknowledge NEPRA's mandate to ensure sustainability of the power sector, it is respectfully submitted that the proposed framework—particularly its retrospective application on existing net-metering licensees—raises serious technical, economic, and policy-credibility concerns.

1. Impact on Existing Net-Metering Consumers Existing net-metering consumers made long-term financial investments under a clearly defined regulatory regime. Altering the settlement mechanism post-investment undermines regulatory predictability, investor confidence, and the principle of legitimate expectation. Even with a differentiated purchase rate, applying net billing to old licensees effectively changes the commercial basis of their decisions.

2. Likely Shift Towards Battery Storage (Unintended Consequences) A significant and immediate consequence of this policy will be a massive shift from grid export to battery-based self-consumption. Consumers will rationally prefer storing energy rather than exporting it at uneconomical rates. This will:

Reduce daytime energy injection into the grid Increase evening peak demand pressure Deprive DISCOs of low-cost distributed generation Accelerate battery imports, adding foreign exchange burden Create new safety, recycling, and environmental challenges In effect, the grid will lose the very support that net metering was designed to provide.

3. Technical & Grid Stability Concerns

Net-metering systems currently contribute to:

Voltage support during daytime

Reduction in transmission and distribution losses Localized generation near consumption points Discouraging exports will reverse these benefits and may increase system stress, particularly during peak evening hours when battery-dependent consumers reconnect to the grid.

4. Public Reaction & Social Acceptance Risk There is widespread public unease regarding both the substance of the policy and the perception of limited stakeholder participation during hearings. Without broad consultation and public acceptance, implementation risks strong resistance, reputational damage, and loss of trust in regulatory processes.

5. Constructive Way Forward (Respectful Suggestions) In light of the above, we respectfully request NEPRA to consider:

Full exemption of existing net-metering licensees from the new net billing regime Grandfathering based on installation or agreement date A gradual, consultative transition model for new consumers only Transparent disclosure of long-term sector modeling and impact analysis Such an approach will preserve investor confidence, maintain grid support, and ensure policy stability while still allowing reforms for future entrants.

This representation is made in good faith and in the national interest, with the sincere hope that NEPRA will revisit the proposed framework and engage stakeholders meaningfully before final implementation.

We remain available for any technical consultation or data-driven discussion that may assist the Authority in reaching a balanced and sustainable decision.

Respectfully submitted,

All solar users

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 10:33 AM
To: Shahid Farooque
Subject: Fwd: Revised Net Metering Solar Policy
Attachments: Objections on NEPRA proposed regulations.docx

----- Original Message -----

Subject: Fwd: Revised Net Metering Solar Policy
Date: 2026-01-07 10:17
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>



----- Original Message -----

Subject: Revised Net Metering Solar Policy
Date: 2026-01-06 21:07
From: Muhammad Iqbal <iqbalfateh@gmail.com>
To: cad@nepra.org.pk

Sent from my iPhone

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 10:33 AM
To: Shahid Farooque
Subject: Fwd: Objection NEPA (Prosumer) Regulations, 2025

----- Original Message -----

Subject: Fwd: Objection NEPA (Prosumer) Regulations, 2025
Date: 2026-01-07 10:17
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objection NEPA (Prosumer) Regulations, 2025
Date: 2026-01-06 19:57
From: Ahmed Raheeq <ahmed.raheeq@hotmail.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>
Copy: "registrar@nepra.org.pk" <registrar@nepra.org.pk>, "chairman@nepra.org.pk" <chairman@nepra.org.pk>

Submitted by: An Individual Household Prosumer

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into millions of rupees, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering.

This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and

- converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are long-term household infrastructure investments. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

- breaks public trust,
- violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,
- discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation



Under the proposed framework:

- households bear all capital, maintenance, and compliance costs,
- distribution companies can limit or curtail exports,
- yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

- the household carries all financial risk,
- the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are not wealthy investors. They are middle-income families trying to:



- protect themselves from rising electricity tariffs,
- reduce load-shedding exposure,
- contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

- how export rates were determined,
- whether savings from reduced fuel imports were considered,
- how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. Protect Existing Household Prosumers All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.
2. No Mid-Term Changes to Buy-Back Rates Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.
3. Fair and Transparent Valuation
Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.
4. Clear Policy for Future Installations Only If changes are necessary, they should apply only to future applicants, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure fairness, predictability, and protection for household prosumers who invested in good faith.

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 10:33 AM
To: Shahid Farooque
Subject: Fwd: Formal Objection to Proposed Prosumer Regulations 2025 – Request for Exemption of Existing Net-Metering Consumers.

----- Original Message -----

Subject: Fwd: Formal Objection to Proposed Prosumer Regulations 2025 – Request for Exemption of Existing Net-Metering Consumers.
Date: 2026-01-07 10:19
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Formal Objection to Proposed Prosumer Regulations 2025 – Request for Exemption of Existing Net-Metering Consumers.
Date: 2026-01-06 19:39
From: Zia-ur-Rehman Gondal <engrzia76@gmail.com>
To: cad@nepra.org.pk, Registrar@nepra.org.pk, Chairman@nepra.org.pk

FORMAL COMPLAINT / PUBLIC COMMENT

TO: The Registrar, National Electric Power Regulatory Authority (NEPRA), Islamabad.

SUBJECT: Formal Objection to Proposed Prosumer Regulations 2025 – Request for Exemption of Existing Net-Metering Consumers.

1. PERSONAL FINANCIAL STAKES & INVESTMENT CONTEXT

I am a domestic consumer and a solar net-metering customer residing in Islamabad. In good faith, following the Government of Pakistan's green energy initiatives, I invested PKR 1.7 Million of my personal savings to install a rooftop solar system.

Based on the prevailing regulations at the time of my installation, my financial model projected a specific payback period. As of today, I still require three (3) more years to reach my break-even point. Any shift toward "Gross Metering" or a reduction in buy-back rates mid-contract would essentially freeze my recovery and turn a responsible household investment into a permanent financial loss.

2. VIOLATION OF "VESTED RIGHTS" & POLICY CONSISTENCY

The proposed 2025 regulations threaten to retrospectively alter the terms of my agreement.

* Retrospective Application: Applying "Gross Metering" or lower rates to existing users violates the principle of legitimate expectation.

* Breach of Trust: My investment was predicated on a 7-year (or

10-year) agreement. Changing these terms unilaterally halfway through undermines the sanctity of regulatory contracts in Pakistan.

3. DISCRIMINATORY ECONOMIC BURDEN

The shift to Gross Metering disproportionately targets middle-class households who:

- * Assume All Risk: I bear the costs of maintenance, cleaning, and equipment depreciation.
- * Subsidize the Grid: My system provides cheap, clean energy during peak daylight hours, reducing the need for expensive furnace oil/LNG imports.
- * Lack of Recourse: Unlike commercial power plants (IPPs), I do not have "capacity payments" or sovereign guarantees to protect my investment if the tariff is lowered.

4. SPECIFIC DEMANDS & RECOMMENDATIONS


I urge NEPRA to incorporate the following protections into the 2025 Regulations:

- * "Grandfathering" Clause: Explicitly state that all existing net-metering consumers (installed prior to the 2025 notification) shall remain under the Net-Metering regime for the remainder of their initial agreement period.
- * Exemption from Gross Metering: Existing prosumers must be exempt from any "Gross Metering" framework, as our systems were technically and financially designed for "Net" exchange.
- * Protection of Payback Periods: Regulations should ensure that no change is made that extends the payback period of a household beyond the original 4-5 year estimate.
- * Prospective Application Only: Any new restrictive policies or lower buy-back rates should apply only to new applicants who can then make an informed decision before spending their capital.

5. CONCLUSION

The 2025 Regulations, as currently drafted, penalize early adopters of renewable energy. For a resident of Islamabad who has spent 17 Lac Rupees, these changes represent a direct financial penalty for supporting the national grid. I request NEPRA to act as a fair regulator and protect the individual household from being used to cover the inefficiencies of the wider power sector.

Respectfully submitted,

 [Zia ur Rehman Gondal]

Cell: 03219595025

[House 248 Street 10, Sector I-10/2, Islamabad]

[Reference Number: 11141251450300]

[6th Jan, 2026]

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 10:33 AM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2026-01-07 10:19
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject:
Date: 2026-01-06 18:03
From: Muhammad Rizwan Khan <rizwank396@gmail.com>
To: cad@nepra.org.pk

PUBLIC COMMENTS ON

NEPRA (Prosumer) Regulations, 2025

Submitted by: An Individual Household Prosumer 1. Background I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into millions of rupees, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering.

This investment was made in good faith with the understanding that:

solar would reduce my long-term electricity bills, excess electricity exported to the grid would be fairly valued, and the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

this removes any certainty of cost recovery, makes long-term financial planning impossible, and converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are long-term household infrastructure investments.

Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems. Changing the rules after citizens have already invested:

breaks public trust,

violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens, discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

households bear all capital, maintenance, and compliance costs, distribution companies can limit or curtail exports, yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

the household carries all financial risk, the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are not wealthy investors. They are middle-income families trying to:

protect themselves from rising electricity tariffs, reduce load-shedding exposure, contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

how export rates were determined,

whether savings from reduced fuel imports were considered, how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations I respectfully request that NEPRA and the Government of Pakistan consider the following:

Protect Existing Household Prosumers

All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.

No Mid-Term Changes to Buy-Back Rates

Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.

Fair and Transparent Valuation

Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.

Clear Policy for Future Installations Only If changes are necessary, they should apply only to future applicants, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure fairness, predictability, and protection for household prosumers who invested in good faith.

Muhammad Rizwan Akram
Consumer id 221511111601
Multan.

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 4:17 PM
To: Shahid Farooque
Subject: Fwd: Public Comments on Draft NEPRA (Prosumer) Regulations, 2025 — Individual Household Prosumer (IESCO)
Attachments: PUBLIC COMMENTS ON NEPRA DRAFT.pdf

----- Original Message -----

Subject: Fwd: Public Comments on Draft NEPRA (Prosumer) Regulations, 2025 — Individual Household Prosumer (IESCO)
Date: 2026-01-07 15:58
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Public Comments on Draft NEPRA (Prosumer) Regulations, 2025 — Individual Household Prosumer (IESCO)
Date: 2026-01-07 13:47
From: aizaz ahmed <aizazahmed@live.com>
To: "registrar@nepra.org.pk" <registrar@nepra.org.pk>
Copy: "cad@nepra.org.pk" <cad@nepra.org.pk>, "Amina.Ahmed@nepra.org.pk" <Amina.Ahmed@nepra.org.pk>, "tfarooqi@nepra.org.pk" <tfarooqi@nepra.org.pk>

Dear Registrar,

I respectfully submit my comments on the draft National Electric Power Regulatory Authority (Prosumer) Regulations, 2025 for consideration and inclusion in the official public consultation record.

I am an IESCO household prosumer, a 63-year-old retired Pakistani citizen, and the owner of about 25 kW grid-connected rooftop solar photovoltaic system installed at my residence. My system was fully installed, approved, and granted concurrence in November 2025, and I invested approximately PKR 4 million from my personal savings in reliance on the regulatory framework then in force.

My attached submission sets out, in detail, my concerns regarding the proposed regulations—particularly in relation to:

- * unilateral and mid-term revision of export valuation,
- * impairment of legitimate expectation and reliance interests,
- * one-sided allocation of economic and regulatory risk,
- * and the disproportionate impact on existing household prosumers, including retired and senior citizens.

These comments are made respectfully and in good faith, with the objective of assisting the Authority in adopting a framework that is fair, predictable, legally robust, and consistent with principles of administrative justice, while still addressing system-level considerations.

I request that my submission be:

- * placed on record as part of the public consultation process, and
- * duly considered before finalization of the Prosumer Regulations, 2025.

Should the Authority require any clarification or additional information, I would be grateful for the opportunity to provide the same.

Thank you for your time and consideration.

Yours sincerely,

Aizaz Ahmed

IESCO Consumer ID No.: 1143684710

CNIC : 42301-5291526-1

City: DHA Islamabad

Mobile: 0321-5564696

Email: aizazahmed@live.com

Attachment:

Public Comments on Draft NEPRA (Prosumer) Regulations, 2025 – Individual Household Prosumer (IESCO)

--

Regards

Lashkar Khan Qambrani

Director (CAD)-NEPRA



PUBLIC COMMENTS ON

NEPRA (Prosumer) Regulations, 2025

Submitted by: An Individual Household Prosumer

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into millions of rupees, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering. This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and
- converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are long-term household infrastructure investments. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

- breaks public trust,
- violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,
- discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

- households bear all capital, maintenance, and compliance costs,
- distribution companies can limit or curtail exports,
- yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

- the household carries all financial risk,
- the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are not wealthy investors. They are middle-income families trying to:

- protect themselves from rising electricity tariffs,
- reduce load-shedding exposure,
- contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

- how export rates were determined,
- whether savings from reduced fuel imports were considered,
- how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. Protect Existing Household Prosumers

All households with installed or approved solar systems should be fully protected

under the terms that existed at the time of installation.

2. No Mid-Term Changes to Buy-Back Rates

Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.

3. Fair and Transparent Valuation

Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.

4. Clear Policy for Future Installations Only

If changes are necessary, they should apply only to future applicants, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure fairness, predictability, and protection for household prosumers who invested in good faith.

PUBLIC COMMENTS ON DRAFT

NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (PROSUMER) REGULATIONS, 2025

Submitted by: Aizaz Ahmed resident of House 35, Street 8, Sector G, DHA Phase 2, Islamabad (aizazahmed@live.com)

An Individual Household Prosumer (IESCO)

Grid-Connected Rooftop Solar Consumer

Particulars of the Prosumer (Standing)

1. I am a 63-year-old retired Pakistani citizen and a lawful electricity consumer of Islamabad Electric Supply Company (IESCO).
2. I installed about 25 kW grid-connected rooftop solar photovoltaic system at my residential premises after investing approximately PKR 4,000,000 (four million rupees) from my personal savings.
3. My system was fully installed, tested, approved, and granted concurrence under the applicable regulatory framework in November 2025, and is operating in accordance with all technical, safety, and metering requirements prescribed by NEPRA and IESCO.
4. This investment was made solely in reliance on the Government of Pakistan's stated renewable-energy policy, NEPRA's prosumer/net-metering regime, and the legitimate expectation that the economic terms would remain stable and predictable for a reasonable recovery period.

Nature of the Investment and Reliance

5. For a retired household consumer, a PKR 4 million rooftop solar installation is not a speculative or commercial venture, but a long-term household infrastructure investment undertaken to:
 - manage rising electricity tariffs,
 - ensure energy security,
 - and contribute to national clean-energy objectives.
6. The financial viability of such a system depends entirely on regulatory certainty regarding export valuation. Any unilateral reduction in buy-back value after

commissioning directly impairs investment recovery and causes irreversible financial harm.

Legal Objection: Arbitrary and One-Sided Revision of Export Value

7. Regulation 14 of the draft NEPRA (Prosumer) Regulations, 2025 allows electricity exported by a prosumer to be valued at the “national average energy purchase price,” while simultaneously empowering the Authority to revise this rate during the subsistence of the agreement

NEPRA Prosumer Regulations 2025

This framework grants unstructured and unilateral discretion to the regulator to alter a core economic term after the household has already made a sunk capital investment.

8. A regulatory arrangement under which:
 - the household bears 100% of capital, financing, and compliance costs, and
 - the export revenue stream remains regulator-variable mid-term, is economically oppressive and legally vulnerable as arbitrary and unreasonable.

Violation of Legitimate Expectation and Administrative Fairness

9. Pakistani superior courts have consistently recognized legitimate expectation as a principle grounded in fairness, holding that where a public authority induces reliance, it must not act in a manner that is capricious, abrupt, or disproportionately harmful.
10. The Supreme Court of Pakistan, as discussed in *PLD 2013 SC 829 (Judges’ Pension Case)*, acknowledged legitimate expectation as a judge-made doctrine applied to prevent administrative unfairness where state action defeats justified reliance.
11. In my case:
 - the State encouraged rooftop solar adoption,
 - NEPRA approved my installation under an existing regime,
 - I irreversibly altered my financial position,
 - and the proposed regulations now seek to devalue the very benefit that justified the investment.

13. Such action defeats legitimate expectation and fails the test of fairness, proportionality, and reasonableness required of an independent regulator.

Retrospective Economic Harm to a Senior Citizen

14. Although the draft regulations purport to operate prospectively, their economic effect on existing, approved prosumers is retrospective, as they impair the revenue stream relied upon at the time of installation.
15. For a retired senior citizen, this is not a marginal inconvenience but a material financial injury, especially where:
- capital recovery horizons are long,
 - income sources are limited,
 - and the investment decision cannot be reversed.
16. Regulatory reform must not operate in a manner that disproportionately burdens elderly and retired citizens who acted in conformity with declared public policy.

Asymmetric Risk Allocation and Lack of Consumer Protection

17. Under the draft regulations:
- all interconnection and system upgrade costs are borne by the prosumer

NEPRA Prosumer Regulations 2025

- licensees retain broad powers to curtail or disconnect exports,
 - yet no compensation, service-level guarantees, or revenue-stability protections are provided to households.
18. This creates a structurally one-sided relationship inconsistent with consumer-protection norms and public-law standards applicable to regulated utilities.

Comparative Public-Law Principles (Persuasive)

19. Comparative jurisprudence (e.g., UK public law) recognizes that where a public authority makes a clear representation inducing reliance, departure requires

overriding public interest and proportionate transition (e.g., *CCSU v Minister for the Civil Service*; *ex parte Coughlan*).

20. While not binding, these principles reinforce the universal administrative-law norm that citizens should not be penalized for trusting government policy.

Specific Reliefs and Amendments Requested

I respectfully request NEPRA to amend the draft regulations as follows:

A. Grandfathering Protection for Existing Approved Prosumers

All household prosumers whose systems were installed and approved prior to the new regulations (including myself, approved November 2025) must retain their original export-valuation methodology for:

- at least 10–15 years, or
- the full economic life of the system, or
- at minimum, the full term of the existing agreement and one renewal.

B. Prohibition of Mid-Term Tariff Revision

Export valuation must not be revised during the subsistence of an agreement for existing prosumers.

C. Transparent, Objective Methodology (Future Only)

Any revised export rate for future applicants must be based on a published, objective, cost-reflective formula, following public consultation.

D. Due-Process Safeguards

Clear procedural protections must be inserted for curtailment, disconnection, metering disputes, and billing delays.

Conclusion

21. I am a retired Pakistani citizen who invested PKR 4 million in rooftop solar in good faith reliance on State policy and NEPRA approvals.

22. A regulatory change that retrospectively undermines that investment is unfair, legally questionable, and socially counterproductive.

PUBLIC COMMENTS ON DRAFT NEPRA(PROSUMER) REGULATIONS, 2025

23. I respectfully urge NEPRA to revise the draft Prosumer Regulations, 2025 to ensure fairness, legal certainty, and protection of existing household prosumers, particularly senior citizens and retirees.

Submitted by:



Name: Aizaz Ahmed

IESCO Consumer ID No.: 1143684710

City: Islamabad

Date: January 07, 2026

Email: aizazahmed@live.com

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 4:18 PM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Consumers
Date: 2026-01-07 15:59
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>



----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Consumers
Date: 2026-01-07 12:25
From: Rabia Allana <rabia_allana@hotmail.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Sent from my iPhone

Begin forwarded message:

> From: Rabia Allana <Rabia_allana@hotmail.com>
> Date: 7 January 2026 at 12:22:48 PM GMT+5
> To: cad@nepra.org.pk
> Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 –
> Additional Adverse Impact on Consumers



>
>
>
>
> The Registrar
> (National Electric Power Regulatory Authority) Islamabad
>
> Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 –
> Impact on K-Electric Consumers
>
> Dear Sir/Madam,
>
> I respectfully submit my objections to the Draft NEPRA (Prosumer)
> Regulations, 2025, published through the press advertisement dated 12
> December 2025 and available on NEPRA's website.
>
> The proposed amendments to the net-metering and prosumer framework

> will cause material financial loss to existing solar consumers who
> installed systems under a lawful and approved regime with legitimate
> expectations of affordability and policy stability. Any reduction in
> export unit value or unfavorable change in settlement mechanisms
> undermines the core purpose of net-metering and discourages investment
> in renewable energy.

>
> As a consumer of K-Electric, I am already adversely affected by:

>
> *
>
> Arbitrary reduction or delayed crediting of exported solar units

> *
>
> Non-transparent and frequent tariff adjustments

> *
>
> Unexplained miscellaneous charges routinely added to electricity bills

>
>
> In this context, the proposed draft regulations will further burden
> compliant prosumers and effectively shift inefficiencies, system
> losses, theft, and recovery shortfalls of utilities onto solar
> consumers, despite no fault on their part.

>
> Such measures are unjust, discriminatory, and contrary to the
> objectives of renewable energy promotion, regulatory certainty, and
> consumer protection. They also erode confidence in long-term energy
> policy consistency.

>
> I respectfully request NEPRA to:

>
> *
>
> Reject any adverse or retrospective changes affecting existing
> net-metering consumers

> *
>
> Ensure prosumers are not penalized to offset utility losses or
> inefficiencies

> *
>
> Protect solar consumers from arbitrary deductions, unlawful charges,
> and non-transparent billing practices, particularly in the case of
> K-Electric

>
> These objections may kindly be placed on record and considered before
> finalization of the regulations.

>
> Yours sincerely,

>
> Rabia Allana

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Wednesday, 7 January, 2026 4:18 PM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Consumers
Date: 2026-01-07 16:11
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>



----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Consumers
Date: 2026-01-07 12:22
From: Rabia Allana <rabia_allana@hotmail.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Sent from my iPhone

> Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 –
> Additional Adverse Impact on Consumers

>
>

> ----- Forwarded message -----

> From: Blessed Enterprises <blessed.enterprises@outlook.com>
> Date: Wed, 7 Jan 2026 at 12:00 PM
> Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 –
> Additional Adverse Impact on Consumers
> To: rabia allana <rabiaallana@gmail.com>

>
>
>

> The Registrar
> (National Electric Power Regulatory Authority) Islamabad
>

> Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 –
> Impact on K-Electric Consumers
>

> Dear Sir/Madam,

>


> I respectfully submit my objections to the Draft NEPRA (Prosumer)
> Regulations, 2025, published through the press advertisement dated 12
> December 2025 and available on NEPRA's website.

>
> The proposed amendments to the net-metering and prosumer framework
> will cause material financial loss to existing solar consumers who
> installed systems under a lawful and approved regime with legitimate
> expectations of affordability and policy stability. Any reduction in
> export unit value or unfavorable change in settlement mechanisms
> undermines the core purpose of net-metering and discourages investment
> in renewable energy.

>
> As a consumer of K-Electric, I am already adversely affected by:

>
> *
>
> Arbitrary reduction or delayed crediting of exported solar units
> *


>
> Non-transparent and frequent tariff adjustments
> *

>
 > Unexplained miscellaneous charges routinely added to electricity bills

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>
> In this context, the proposed draft regulations will further burden
> compliant prosumers and effectively shift inefficiencies, system
> losses, theft, and recovery shortfalls of utilities onto solar
> consumers, despite no fault on their part.

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> Such measures are unjust, discriminatory, and contrary to the
> objectives of renewable energy promotion, regulatory certainty, and
> consumer protection. They also erode confidence in long-term energy
> policy consistency.

>
> I respectfully request NEPRA to:

>
> *
>
 > Reject any adverse or retrospective changes affecting existing
> net-metering consumers
> *

>
> Ensure prosumers are not penalized to offset utility losses or
> inefficiencies
> *

>
> Protect solar consumers from arbitrary deductions, unlawful charges,
> and non-transparent billing practices, particularly in the case of
> K-Electric

>
> These objections may kindly be placed on record and considered before
> finalization of the regulations.

>
> Yours sincerely,

>
> Rabia Allana
>
> K-Electric Consumer No LA127274
> D-43/1, Block-5, Clifton, Karachi - 75600, Pakistan [1]

Links:

[1]
<https://www.google.com/maps/search/43%2F1,+Block-5,+Clifton,+Karachi+-+75600,+Pakistan?entry=gmail&source=g>

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA




Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Thursday, 8 January, 2026 3:36 PM
To: Shahid Farooque
Subject: Fwd: Request for Protection of Existing Solar Net Metering Consumers in Pakistan

----- Original Message -----

Subject: Fwd: Request for Protection of Existing Solar Net Metering Consumers in Pakistan
Date: 2026-01-08 14:50
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----


 Subject: Request for Protection of Existing Solar Net Metering Consumers in Pakistan
Date: 2026-01-08 10:20
From: Bashir Kiani <kiani62ak@gmail.com>
To: cad@nepra.org.pk

Respected Sir/Madam,

I hope this email finds you well.

I am writing to express my serious concern regarding the proposed changes in the net metering policy in Pakistan. Many citizens have already invested a significant amount of their hard-earned money in installing solar systems under the existing government-approved net metering policy.

These investments were made based on the rules, rates, and assurances provided by the government at that time. If the policy is now changed and applied to existing solar consumers, it would be highly unjust and unfair. Such a decision would cause financial loss to those who trusted government policies and contributed positively toward reducing the national energy burden.

 We strongly request that if any new net metering policy is to be implemented, it should apply only to new customers, not to those who have already installed solar systems under the previous policy. Protecting existing consumers will maintain public trust and encourage future investment in renewable energy.

Solar energy is beneficial not only for individuals but also for the country's economy and environment. Penalizing early adopters will discourage others from investing in clean energy solutions.

We humbly request the government to reconsider this matter and ensure justice for existing solar net metering consumers.

Thank you for your time and consideration.

Yours sincerely,
Muhammad Bashir Kiani
Islamabad
03329299367

Registrar

From: Zahoor Dogar <zahoordogar63@gmail.com>
Sent: Tuesday, December 23, 2025 3:27 PM
To: registrar@nepra.org.pk
Subject: Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers
Attachments: NEPRA Objections Regulations-2025.jpg; NEPRA Objections Regulations 2025.jpg

To,

The Registrar (NEPRA),
Islamabad.

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan. Our excess exported solar units are adjusted on quarterly basis instead on monthly basis. In this way we have to pay excess amount to PBL.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Forwarded to:

<input checked="" type="checkbox"/> For Action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (PSE)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIG)
<input type="checkbox"/> ADG (TET)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please,

✓ Chairman 2 M (Tech)
✓ M (Law) 4 M (Dev)

License
Plan
Date
157
6/7-26

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Engineer Zahoor Ahmad Dogar
House No. 30, Street No 3,
Overseas Sector-4, Bahria Town
Phase-8, Rawalpindi.
03365002791

Chairman NEPRA

From: rafi Khan <rafikhan58@gmail.com>
Sent: Friday, January 2, 2026 2:31 PM
To: Registrar@nepra.org.pk; cad@nepra.org.pk; Chairman@nepra.org.pk
Subject: Review of New Solar Energy Systems Policy

My Dear Sir!

IPPs of Pakistan have been bleeding the people of Pakistan and its economy for the last 30-35 years with the alleged connivance of its leadership and senior bureaucracy. The unique contracts in this regard are laughable in the world of morality and ethics and are the principal cause of Pakistan's industrial failure and economic bankruptcy. Unfortunately, those who have planned and executed these contracts and the projects have allegedly violated their oath of loyalty to the State and its people.

The US, Europe, China, India, and even countries like Bangladesh, Vietnam, and Indonesia have helped their people through positive policies for development by providing access to affordable energy resources, such as solar systems and hydroelectricity. However, it is quite unfortunate that our leadership, despite being aware of the critical negative economic issues resulting from IPPs, has further extended their contracts upon maturity to further their alleged corrupt practices, thereby fleecing the poor and undermining Pakistan's economic security.

In Pakistan, the people who tried to diversify the generation of cheap solar energy on their rooftops for their domestic and industrial uses based on earlier government policy and assurances are really upset now, on the news of a change in the policy to benefit the crocodiles of IPPs instead of the interest of the State and its poor people. The current step of the government's backing towards the mafia is detrimental to Pakistan's economic security and sovereignty. This cannot be expected from any patriot who is loyal and sincere towards Pakistan and its people.

May I, therefore, request your excellency and those in authority to kindly reconsider and review the new policy on Solar Energy Systems, as well as the termination of IPP contracts that are over and above our capacity for the distribution system of electricity in Pakistan. It shall be in the best interest of Pakistan's existence. A "STATUS QUO" in this respect shall help in saving the future of our children and the security of Pakistan.

For your kind consideration, please.

Brig Rafi uz Zaman Khan(Retd)
Islamabad.
Cell No: ++92-342-3090909
Email : rafikhan58@gmail.com

Forwarded please:

<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/ECM)

For kind information, please.

☒ Chairman ☒ M (Tech)
☒ M (Law) ☐ 4. M (Dev)

RECEIVED
Date: 5-1-26
323

CHAIRMAN
Dy No: 31
Date: 02-01-26

Registrar

From: Saqib Minhas <saqibminhas@live.com>
Sent: Tuesday, December 23, 2025 3:29 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:
Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

“Misc.Charges” routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

- Reject any adverse or retrospective changes affecting existing net-metering consumers;
- Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
- Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Regards

Saqib Minhas

NEPRA
Licensing Department
Maryam
6-26

[Handwritten signature]

Forwarded please:
☒ For no. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (TM)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (HR/M)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Aftab Sh <aftabsh1997@gmail.com>
Sent: Tuesday, December 23, 2025 4:43 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

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Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Aftab Altaf

[BTPL Consumer]

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
<input type="checkbox"/> DG (E.C.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Lit.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (LEGAL)

For kind information please,
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Asad Ali Mufti <asadali.mufti@gmail.com>
Sent: Tuesday, December 23, 2025 4:06 PM
To: registrar@nepra.org.pk
Subject: Objection to Draft NEPRA

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Venerable Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

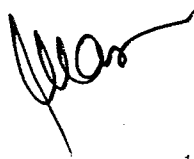
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Asad Ali Mufti

H # 230
Rati block



1

Forwarded please:

<input checked="" type="checkbox"/> For no action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Hrt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> M&A	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please.

✓ Chairman 2. M (Tech)
✓ M (Law) 4. M (Dev)

307
F.1.25

Registrar

From: Tauseef Rahman <tauseef44a@gmail.com>
Sent: Tuesday, December 23, 2025 4:05 PM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA’s website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:
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Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Tauseef ur Rahman

[BTPL Rawalpindi Consumer /
H.No:270, Sector 5 / Phase –8

Forwarded please:

<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/R)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Int.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> DG (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information, please,
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Planning Department
Copy No. 122
Date: 6-1-26

5.1.26
308

Registrar

From: Nauman Siddique <GMFongas@fauji.org.pk>
Sent: Tuesday, December 23, 2025 3:34 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

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- "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

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- Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
- Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Warm Regards,



Brigadier Nauman Siddique, SI(M) (Retired)
General Manager (GM)
Foundation Gas (Fongas)
Services Plaza, The Mall, Saddar, Rawalpindi
☎ 051-5584936 📧 gmfongas@fauji.org.pk

✓

369
5-1-26

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145-26
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1

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<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LJ)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (Comm)

For kind information please,
1. Chairman 2. SA (Tech)
3. M (Law) 4. SA (Dev)

Registrar

From: zia sarwar <ziasarwar8@gmail.com>
Sent: Tuesday, December 23, 2025 4:54 PM
To: registrar@nepra.org.pk
Subject: Prosumer regulation , 2025

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA’s website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Zia Sarwar House 55, street 5, Bahria Hill View phase 7 Rawalpindi Sent from my iPhone

NEPRA
Processing Department
Diary No. 146
Date: 6-1-26

1

Forwarded please:

<input checked="" type="checkbox"/> For info. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Inc.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EUCOM)

For kind information, please:

Chairman	2. M (Tech)
M (Law)	4. M (Dev)

Registrar

From: Ghafarullah Khan Wazir <gukw472@gmail.com>
Sent: Tuesday, December 23, 2025 5:16 PM
To: registrar@nepra.org.pk
Subject: Subject: Objection to draft NEPRA(Prosumer) Regulation 2025.

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

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Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[Name]

[BTPL Consumer /

Address / Ghafar Ullah Khan Wazir House No-472 Sector -D Street No-9 Askari-10 Lahore Cantt

For onward placement:
☒ For recommendation ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trd.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> GLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (TCBM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: maqbool chaudhry <chaudhrymaqbool@gmail.com>
Sent: Tuesday, December 23, 2025 5:19 PM
To: registrar@nepra.org.pk
Subject: Net Metering

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Maqbool Ahmad Chaudhry

[BTPL Consumer /
House 9, Street 2, Bahria Hills View
Bahria Town Phase 7, Rawalpindi

Sent from my iPhone

Forwarded please:

☒ For discussion ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADP (Inf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CHRM)

For kind information, please:

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Muhammad Abdul Qayyum <mabdulqayyum@gmail.com>
Sent: Tuesday, December 23, 2025 5:18 PM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
M. Abdul Qayyum

House # 774
Street # 46
Phase # 2

Forwarded please:

<input checked="" type="checkbox"/> For processing	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (L.C.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Enl.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Legal)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

BAHRIA TOWN, RAWALPINDI/ ISLAMABAD.

Registrar

From: Adnan Mushtaq Ali <adnanmush@gmail.com>
Sent: Tuesday, December 23, 2025 5:30 PM
To: registrar@nepra.org.pk
Subject: Grievance

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

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Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Adnan Mushtaq Ali

Forwarded please:
☒ For no. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Inf.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Policy)

For kind information, please:
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Duty No. 152
Date: 6-1-26

Route ID - UD / 221221288000-28992

Hno 64, street 05, Bahria Hills View, Phase 7, Bahria Town, Islamabad

Chairman NEPRA

From: Saeed Zafar <zafar.alm@gmail.com>
Sent: Thursday, January 1, 2026 12:58 PM
To: chairman@nepra.org.pk
Subject: Policy Changes about Private Solar Production

Dear Sir,

It is reassuring to see NEPRA seeking input on important public issues through public hearings and direct feedback.

It is disturbing to see arbitrary and abrupt policy changes affecting private solar production. Initially incentives were given to encourage private investment in the field of green power generation. Since then, goal posts have been shifting against those contributing power to the national grid. Various NEPRA decisions in this regard remained un- implemented due to non- serious attitudes and influence of the big fish. Net- metering was introduced at the cost of the common man, who never got his due returns. Escalating power costs forced people to invest more into additional solar panels and power banks, etc. Current steps in the pipeline appear to be punitive rather than supportive of private contributions, while terms of IPPs contracts remain sacrosanct.

NEPRA, while mandated to balance and safeguard interests of all stake holders finds itself in an awkward and frustrating balancing act.

While policy decisions are taken elsewhere, NEPRA ends up as more of an implementer than a regulator, thus carrying the onus of the consequences.

Another disturbing aspect is application of new rules in retrospect, which is ultra vires.

We are confident that NEPRA would play its advisory role effectively and ensure protecting private interests alongside public interests - unless, as usual, it is fait accompli !

With best wishes and regards,

Lt Gen Saeed uz Zafar (Retd)

Sent from my iPhone

Forwarded please:

<input checked="" type="checkbox"/> For rec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (Gen)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trf)	<input type="checkbox"/> DG (Fin)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (HR/HRM)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN

84

Dy No. 01-01-26

Date: 01-01-26

Chairman NEPRA

From: khalid mehmoor <kmehmood59@yahoo.com>
Sent: Thursday, January 1, 2026 7:05 PM
To: cad@nepra.org.pk
Cc: registrar@nepra.org.pk
Subject: The Registrar (NEPRA) Islamabad Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers.

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Khalid Mehmood

Generation License No. DGL/1418/2019
IESCO Consumer ref No. 1514233326800
Address: House No. 676 Street 34 Block C
Sector B-17 MPCHS
Islamabad.

Contact No. 0331-5186389

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For kind information, please.

☒ Chairman ☒ M (Tech)
☒ M (Law) ☐ M (Dev)

CHAIRMAN
By No. 20
Date: 02-1-26

Chairman NEPRA

From: Saad Mustafa <enr_saadmustafa@yahoo.com>
Sent: Thursday, January 1, 2026 8:49 PM
To: chairman@nepra.org.pk
Subject: Net Metering Policy

RECEIVED OFFICE
Dy No. 315
Date: 5/1/26

Dear Sir,

Assalam u Alaikum,

I urge you to reconsider the proposed decision regarding the shift from net metering to net billing, taking into account its potential impact on the public and energy producers. Previous decisions have shown that the effects of such changes can be far-reaching and unforeseen, as was the case with the introduction of net metering.

As an engineer myself, I predict that this decision may lead to unintended consequences, causing problems for Independent Power Producers (IPPs) and Distribution Companies (DISCOs) within a short period. I strongly advise thorough consideration and evaluation of the potential outcomes before implementation.

A more effective approach would be to focus on reducing electricity prices and incentivizing higher consumers with lower tariffs, which would not only benefit the public but also encourage sustainable energy production.

Sincerely,
Engr Saad Mustafa

Yahoo Mail: Search, Organize, Conquer

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For kind information, please.

☒ Chairman ☒ M (Tech)
☒ M (Law) ☐ M (Dev)

~~Registrar~~

Plan

CHAIRMAN
Dy No. 21
Date: 02-01-26

Registrar

From: Umar Sajjad <umar.sajjad8@gmail.com>
Sent: Wednesday, December 24, 2025 2:13 PM
To: registrar@nepra.org.pk; cad@nepra.org.pk; chairman@nepra.org.pk
Subject: Concern and Objection Regarding Proposed Net Billing Policy

Dear Sir,

I hope this email finds you well.

I am writing as a concerned citizen and a solar net-metering user to share my serious concerns regarding the Draft Prosumer Regulations 2025 and the proposed shift from Net Metering to the new Net Billing Policy, as advertised on 12 December 2025.

Like many others, I invested in a solar system after carefully considering the existing net-metering regulations and the assurances provided by the regulatory framework at that time. These systems require significant upfront investment, and the decision was made in good faith with the understanding that the rules would remain stable. Applying a new policy to existing users feels unfair and deeply discouraging.

My main concerns are:

1- Retrospective impact on existing users:

Changing the rules after people have already invested puts an unexpected financial burden on households and small businesses who were simply trying to reduce their electricity costs and support clean energy.

2-Very low buyback rates: The proposed rates, especially for new users, make solar generation economically unattractive and do not reflect the actual value that distributed solar brings to the grid.

3-Limited public consultation: Many affected users feel they did not get a meaningful opportunity to be heard before such a major change was proposed.

This policy, if implemented as proposed, risks slowing down solar adoption at a time when Pakistan needs affordable energy, energy independence, and environmental sustainability more than ever.

I sincerely request NEPRA to please reconsider this approach. At the very least, existing net-metering consumers should be fully protected and exempted from any new policy changes. A broader and more transparent consultation with stakeholders would also help build trust and lead to better outcomes for everyone.

Thank you for taking the time to read this email. I hope NEPRA will carefully consider the concerns of ordinary consumers before finalizing this policy.

Kind regards,
Sajjad Hussain

Forwarded please:

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For kind information, please.

1 Chairman 2 M (Tech)
3 M (Law) 4 M (Dev)

NEPRA
Licensing Department
Copy No. 158
Date: 6-1-26

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5.1.26

15-01-26

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For kind information, please:

☒ Chairman ☐ M. (Tech)
☒ M. (Law) ☐ M. (Dev)

Subject: Feedback on the Proposed Net-Metering Policy

Respected Chairman NEPRA,

I am writing to provide my feedback on the draft "National Electric Power Regulatory Authority (Prosumer) Regulations, 2025," published on December 16, 2025, which proposes significant changes to the existing net metering framework for Solar system installation. As a resident of Pakistan interested in sustainable energy solutions, I am deeply concerned about how these changes could negatively impact ordinary Pakistani households, who are contemplating investing in solar energy to reduce their electricity bills and contribute to a greener future.

The proposed shift from net metering to a net billing or gross metering system would fundamentally alter the financial viability of solar installations for residents. Under the current net metering policy, households can offset their grid consumption with solar exports at retail rates (approximately PKR 22-26 per unit), leading to substantial savings and payback periods of 2-4 years for a typical system. However, the new regulations would require prosumers to pay full retail tariffs for imported electricity while receiving credits for exports at a much lower rate, such as the national average energy purchase price (around PKR 11-13 per unit). This disparity could drastically reduce monthly savings, extending payback periods, making solar investments unaffordable or unattractive for many families already grappling with high inflation and rising energy costs.

For local Pakistani people, where load shedding and high tariffs are common, solar has been a beacon of hope for energy independence. Many households, including mine, have been planning to install solar system. These changes could deter thousands of potential adopters, slowing the growth of renewable energy in a country that desperately needs it to combat climate change, reduce fossil fuel dependence, and alleviate the circular debt burden on the power sector.

Moreover, the policy overlooks the broader environmental impacts, fewer solar installations mean higher carbon emissions from coal and gas-based generation, affecting air quality in polluted cities and contributing to global warming – issues that directly impact public health and agriculture in Pakistan.

I urge NEPRA to reconsider these changes by:

- Maintaining net metering policy for residential systems (e.g., under 25 kW) to encourage widespread adoption.
- Introducing tiered export rates that better reflect retail prices, ensuring fair compensation.
- Conducting a comprehensive impact assessment involving stakeholders from consumer groups, solar installers, and environmental organizations.

Your consideration of public feedback is crucial to crafting a balanced policy that supports both the power sector's sustainability and the aspirations of everyday Pakistanis. I look forward to the public hearing and hope these concerns will be addressed in the final regulations. Thank you for your attention to this matter.

Sincerely,
Hassan Fraz
Rawalpindi

Registrar

RECEIVED
Date: 15.1.26
9.21

CHAIRMAN
Date: 13-1-26
BY NO.

NEPRA
Licensing Department
Diary No. 406
Date: 16-1-26

Request for Reconsideration of Net Metering and Gross Metering Policy

Respected Chairman NEPRA,

We hope this letter finds you well.

We wish to formally express our concerns regarding the recent developments in the net metering policy and the proposed implementation of the gross metering framework. In its current form, this policy appears to be against the rights and long-term interests of solar consumers and the nation at large.

Pakistan is steadily evolving in a rapidly changing global landscape, where sustainable energy solutions are no longer a choice but a necessity. Our country is already facing severe environmental challenges, including rising pollution levels and increasing dependence on imported fossil fuels.

The current policy direction being implemented by NEPRA does not appear to fully align with these national interests. We believe that such a significant shift requires deep, transparent, and thorough research, taking into account economic, environmental, and social impacts. Considering the existing gross metering policy, we strongly believe that reasonable relaxation and incentives are essential. A supportive policy framework encourages industry growth, promotes imports of advanced technologies.

We respectfully submit that policies which hinder renewable energy adoption are not only discouraging for businesses and consumers but are also counterproductive for the nation. A nation must protect and promote initiatives that ensure economic stability, environmental responsibility, and social progress.

With due respect, we politely request you to reconsider the current policy framework and approach this matter with a collective national perspective. We urge you to think as one nation, prioritizing long-term benefits over short-term constraints, and to formulate policies that truly serve the rights, growth, and future of Pakistan.

Thank you for your time and consideration. We remain hopeful for a positive review and a balanced policy decision in the best interest of the country.

Yours sincerely,
Ehtesham Farooq

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For kind information, please:
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 952
Date: 12.11.26

CHAIRMAN
386
By No: 13-1-26
Date: 13-1-26

Concern Regarding Recent Changes in Net Metering Policy

Respected Chairman NEPRA,

We hope this letter finds you well,

I am writing this letter as a concerned middle-class household owner and a responsible citizen of Pakistan. I respectfully wish to share my serious concerns regarding the recent changes in the net metering policy and the proposed shift towards gross metering.

For families like ours, installing solar systems was not a luxury but a necessity. Rising electricity costs, frequent power shortages, and financial pressure pushed us towards solar energy as a long-term and lawful solution. These systems were installed with great personal sacrifice, savings, and trust in government policies that encouraged renewable energy adoption.

The recent policy changes have created fear and uncertainty among ordinary citizens. For a middle-class household, such sudden decisions directly affect monthly budgets, financial planning, and peace of mind. A solution that was promoted as beneficial for both the nation and its people has now become a source of concern.

Solar energy helped reduce our electricity burden while also contributing to a cleaner environment and supporting the national grid. It allowed common citizens to play a small role in building a sustainable future for Pakistan. Policies that discourage solar adoption risk pushing families back into financial hardship.

I humbly request the Government and relevant authorities to reconsider these policies with fairness and empathy. A careful review that considers the impact on middle-class households would strengthen public trust and support long-term national interests.

Yours sincerely,

Sajawal Hashmi

REGISTRAR OFFICE
Diary No: 823
Date: 15.1.26

CHAIRMAN
DY No: 379
Date: 13-1-26

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For kind information, please,
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

Chairman NEPRA

From: Yasir Aftab <yasiraftab2233@gmail.com>
Sent: Tuesday, January 13, 2026 2:03 PM
To: Chairman@nepra.org.pk
Subject: Net billing

Aoa sir i request you that this net billing is very unjust ,plz don't do it as we are old customers it should be the same for 7 years our should not be gross metering and also the meter we have got the notice for ami we have already installed green why should we change the meter kindly solve this issue.

Sent from my iPhone

Registrar

(at)
15-01-26

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For kind information, please:

☒ Chairman ☐ 2. M (Tech)
☒ 3. M (Law) ☒ 4. M (Dev)

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REGISTRAR OFFICE
Diary No: 356/26
Date: 13/01/26

REGISTRATION DEPARTMENT
Diary No: 402
Date: 16-1-26

CHAIRMAN
By No: 384
Date: 13-1-26

Chairman NEPRA

From: Imran Iqbal <imraniqbal74@gmail.com>
Sent: Tuesday, January 13, 2026 11:31 PM
To: chairman@nepra.org.pk; registrar@nepra.org.pk
Subject: Proposed policy changes for Net-metering

Dear Sir / Madam,

I am writing with regards to the proposed changes in net-metering regulations and the introduction of net-billing mechanism. In my opinion, this is too early to introduce such discouraging measures. The changes should be introduced gradually. Net-billing policy will massively impact solar producers/prosumers. At this stage, it would be better to only reduce the buy-back rate but with limited reduction. for example: reduction of buy back rate from PKR 24 to PKR 20 per exported unit. Over a period of 3-4 years, only the buy back rate should be reduced gradually. Net-billing should never be introduced. Other countries are instead offering incentives and subsidies, whereas we are thinking of discouraging solar adoption and that too with sudden strict measures. There may be some countries who have introduced net-billing, but the rate of electricity in those countries is already very low for consumers. In Pakistan, the cost of electricity is very high and net-metering serves as some cost saving, especially to a person like me who is already paying direct taxes on salary every month and other taxes on all consumer goods including fuel.

I therefore humbly request you to please discard the introduction of Net-billing and let the net-metering solar systems continue and make the changes gradually in buy back rate every other year for the new net-metering joiners on the grid.

Kind Regards
Imran Iqbal

AGM/REG	✓	Adm. Dir.	ED
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ATA	POA-1	POA-2	POA-3

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

15-01-26

CHAIRMAN
388
Dy No.
Date: 14-1-26

14.01.26

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For kind information, please,
 1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
 Diary No: 829
 Date: 14.1.26

Honorable Wasim Anwar Bhinder Esq,
 Registrar, National Electric Power Regulatory Authority
 NEPRA Tower, Attaturk Avenue (East) G-5/1,
 Islamabad registrar@nepra.org.pk

Sir,

Assalamu Alaikum and hope this email finds you in good health and wealthy spirit. This is with reference to Draft (Prosumer) Regulations inviting comments. Accordingly, on behalf of 100+ Group of Roof Top Solar Installers, upon studying an 18-page document, please find our comments highlighted in red in the attachment. It would have been only appropriate, if instead of repealing the Net Metering Regulations 2015, the Authority would have proposed amendments into it as it was done in 2018. In my view, the Authority can still follow the old process for the benefit of many Prosumers who are not technically sound.

Having said above and in addition to the comments offered in the attachment, I would like to submit the following.

1. The draft has no regard to the substantial environmental benefits that accrue to Pakistan's ecosystem through reduced greenhouse gas emissions, improved air quality, and contributions to climate resilience. Rooftop solar directly displaces fossil fuel-based generation, aligning with national and international commitments under the Paris Agreement. In this context Transparency International Pakistan has estimated that, by addressing a portion of its greenhouse gas emissions through carbon projects (including renewables like solar), the country could generate up to USD 400 million annually (and potentially up to USD 2.25 billion) in carbon credits from voluntary and compliance markets <https://www.brecorder.com/news/40384148> Thus, instead of repealing the 2015 Net Metering Regulations, The government should prioritize developing mechanisms by getting authority from Prosumers to capture and monetize these credits at the national level.
2. It is stated in the Clause 20 titled Saving and Repeal that Notwithstanding the repeal effected by these regulations, **nothing shall affect or be deemed to affect**, the license issued and agreement executed under the repealed regulations before commencement of these regulations, **yet the sentence thereafter except the billing shall be in accordance with regulation 14 commencing from the billing cycle subsequent to the month in which these regulations come into effect**; tantamount to breach of terms and conditions granted to license holders through Net Metering Regulations 2015. In view of 1 above, there is no need to repeal the 2015 Net Metering Regulations except including minor amendments such as misuse of installation by the prosumers mentioned in the attachment in the same way as it was done in 2018 (Annex I).

NEPRA
 Licensing Department
 Diary No: 371
 Date: 15-1-26

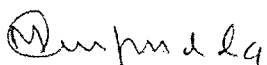
3. According to Pakistan Center for Philanthropy statement of 9th January 2026 Pakistan ranks 17 of 101 countries for how generous its people are in terms of income donated. <https://www.dawn.com/news/1965933> In order to promote this generosity, instead of offering Net Metering Benefit in cash @ NAPPP/NAEPP, <https://www.brecorder.com/news/40398584> Pakistan should be the first country in the world to allow donation of surplus units to needy and poor, specially widows and specially challenged people, This can be done by:

- i) Encouraging Not for Profit Organizations (NPO duly certified by the Pakistan Center of Philanthropy and holding tax exemption from FBR) to establish "Digital Electricity Units Trust" (DEUT) and develop by-laws, mechanism and SOPs as well as enter into agreements with Licensee and Prosumers whereby:
- ii) A month before the beginning of the billing cycle, Prosumers will authorize licensee through an App or via registered email to transfer, at the end of quarter surplus units, to a designated NPO.
- iii) Upon receipt of list of accounts of données from the NPO, licensee shall share their monthly bills and either provide electronic access to the Trustee for credit of reasonable number of units against the monthly bill of each before the due date or
- iv) Upon receipt of list of accounts of données from the NPO and the reasonable number of units thereof, licensee shall directly transfer to the consumers and confirm the same to the Trustee.
- v) At the end of year, NPO shall get its DEUT account audited from ICAP approved Auditor and the report thereof without disclosing the name of donors and données be send to Licensee and NEPRA as well as placing it on the website of NPO.

I hope the above submission and the comments offered in the attachment on the Draft of (Prosumer) Regulations 2025 in the larger interest of all stakeholders of the country will receive favorable consideration by the esteemed Authority.

Warm regards

Yours sincerely



Moin M Fudda
on behalf of Net Metering Group of Karachi
January 10, 2025

Annex-A

National Electric Power Regulatory Authority
(LEGAL DEPARTMENT)

July 20th, 2018

Subject: **CONSULTATIVE SESSIONS HELD BY NEPRA ON 24-04-2018 REGARDING PROCUREMENT OF ENERGY THROUGH DISTRIBUTED GENERATION**

3. Reference is made to the consultative session held by NEPRA, 24-04-2018, regarding procurement of energy through Distributed Generation by Distribution Companies via net metering. The session was held to deliberate upon the numerous issues relating to the net metering regime under the National Electric Power Regulatory Authority (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015 (**Net Metering Regulations**).

4. The Authority thereafter, in RM 18-333 held in June 2018 reviewed and deliberated the submission and comments of various stakeholders during the consultative sessions, and various amendments to the net metering regime were approved by the Authority.

5. In view thereof, the following amendments to the Net Metering Regulations have been drafted to effectuate the changes approved by the Authority in the above mentioned RM –

S. No.	Existing Regulation	Proposed Regulation
1.	2(1)(d) Definition "Applicable Tariff" means tariff approved by the Authority for the relevant period and category of consumers of the Distribution Company;	2(1)(d) Definition <u>"Applicable Tariff" means tariff determined by the Authority and duly notified by the Federal Government from time to time;</u>
2.	2(1)(e) Definition "Applicant" means a 3 phase 400V or 11kV domestic, commercial, industrial or agricultural consumer of a Distribution Company, which submits an Application to interconnect its proposed Distributed Generation Facility to the Distribution System of the Distribution Company and who applies for grant of the license to operate a Distributed Generation Facility as a Distributed Generator;	2(1)(e) Definition "Applicant" means a 3 phase 400V or 11kV domestic, commercial, industrial, or agricultural, <u>general services or single point bulk supply</u> consumer of a Distribution Company, which submits an Application to interconnect its proposed Distributed Generation Facility to the Distribution System of the Distribution Company and who applies for grant of the license to operate a Distributed Generation Facility as a Distributed Generator;
3.	3(1) Application Process for Interconnecting Distributed Generation Facility (1) Any Applicant who meets the requirements of these Regulations is eligible for submitting an Application as specified in Schedule-II to a Distribution Company;	3(1) Application Process for Interconnecting Distributed Generation Facility (1) <u>Subject to sub-regulation (2),</u> any Applicant who meets the requirements of these Regulations is eligible for submitting an Application as specified in Schedule-II to a Distribution Company;

	<p>Provided that the Distribution Company shall be bound to provide information and Authority's approved documents in response to the request from Applicant free of cost within two working days.</p>	<p>Provided that the Distribution Company shall be bound to provide information and Authority's approved documents in response to the request from Applicant free of cost within two working days.</p> <p><u>(2) The capacity of a proposed Distributed Generation Facility shall not exceed one and a half of the sanctioned load of the Applicant's premises:</u></p> <p><u>Provided that this sub-section (2) shall cease to have effect after one year from the date its notification.</u></p>
4.	<p>4. Licensing</p>	<p>4. Licensing (New Insertion)</p> <p><u>(4) Distributed Generation License shall stand revoked in case the licensee fails to commence Distributed Generation within six months of grant of Distributed Generation License.</u></p>
5.	<p>14. Billing for Net Metering</p> <p>(1) At the end of each Billing Cycle following the date of final interconnection of Distributed Generation Facility to the Distribution System of the Distribution Company, the Distribution Company shall net off the kWh supplied by Distributed Generator against the kWh supplied by it.</p> <p>Provided that the meter readings shall be carried out preferably through Hand Held Units (HHU) and through automated means as directed by the Authority from time to time.</p> <p>(2) In case the kWh supplied by Distribution Company exceed the kWh supplied by Distributed Generator, the Distributed Generator shall be billed for the net kWh in accordance with the Applicable Tariff.</p> <p>(3) In case the kWh supplied by Distributed Generator exceed the kWh</p>	<p>14. Billing for Net Metering</p> <p>(1) At the end of each Billing Cycle following the date of final interconnection of Distributed Generation Facility to the Distribution System of the Distribution Company, the Distribution Company shall net off the kWh supplied by Distributed Generator against the kWh supplied by it.</p> <p>Provided that the meter readings shall be carried out preferably through Hand Held Units (HHU) and through automated means as directed by the Authority from time to time.</p> <p><u>(2) The kWh supplied by a Distributed Generator during peak hours shall be net off against the kWh supplied by a Distribution Company during peak hours and the kWh supplied by a Distributed Generator during off peak hours shall be net off against the kWh supplied by a Distribution Company during off peak hours.</u></p> <p>(3) In case the kWh supplied by Distribution Company exceed the kWh supplied by Distributed Generator, the Distributed Generator shall be billed for the net kWh in accordance with the Applicable Tariff.</p> <p>(4) In case the kWh supplied by Distributed Generator exceed the kWh</p>

<p>supplied by Distribution Company, the net kWh shall be credited against Distributed Generator's next billing cycle for future consumption, or shall be paid by the Distribution Company to the Distributed Generator quarterly.</p> <p>Provided that where the Distributed Generator is to be paid, the kWh in a month will be charged at the tariff of that respective month.</p> <p>(4) The tariff payable by the Distribution Company shall only be the off-peak rate of the respective consumer category of the respective month and other rates such as variable charges for peak time, fixed charges, fuel price adjustment, duties/levies will not be payable by Distribution Company.</p> <p>(5) The Authority may determine the tariff payable by the Distribution Company to the Distributed Generator from time to time; provided, however, the tariff once awarded to a Distributed Generator shall remain valid for a term of the Agreement/License.</p>	<p>supplied by Distribution Company, the net kWh shall be credited against Distributed Generator's next billing cycle for future consumption, or shall be paid by the Distribution Company to the Distributed Generator quarterly.</p> <p><u>Omitted.</u></p> <p>(5) <u>The price payable by a Distribution Company for net kWh shall be the national average power purchase price of the Distribution Company as determined by the Authority and notified by the Federal Government.</u></p> <p>(6) The Authority may determine the tariff payable by the Distribution Company to the Distributed Generator from time to time; provided, however, the tariff once awarded to a Distributed Generator shall remain valid for a term of the Agreement/License.</p>
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**NATIONAL ELECTRIC POWER REGULATORY AUTHORITY
(PROSUMER) REGULATIONS, 2025**

S.R.O _____.— In exercise of the powers conferred by section 47 read with section 7 (1) of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (XL of 1997), the National Electric Power Regulatory Authority, is pleased to make the following regulations, namely:

1. Short title, commencement. — (1) These Regulations may be called the National Electric Power Regulatory Authority (Prosumer) Regulations, 2025.

(2) They shall come into force at once.

2. Definitions.— (1) In these regulations unless there is anything repugnant in the subject or context,—

(a) "Act" means the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (XL of 1997)

(b) "agreement" means the agreement between the licensee and the prosumer on the Authority's approved format as per Schedule-I;

(c) "applicable documents" means the rules and regulation, terms and conditions of any licence, registration, concurrence, authorization, determination, any code, manuals, directions, guidelines, orders, notifications, agreements or documents issued or approved under the Act;

(d) "applicable tariff" means the tariff determined by the Authority and duly notified in the official Gazette;

(e) "applicant" means a 3 phase 400V or 11kV domestic, commercial, industrial, agricultural, general services consumer or a single point bulk supply consumer of a licensee, which submits an application to interconnect its proposed distributed generation facility to the distribution system of the licensee and who applies for the accord of concurrence to operate a distributed generation facility as a prosumer;

(f) "application" means the application submitted by an applicant to licensee, for interconnection of a distributed generation facility to the distribution system of a licensee and includes application for the accord of concurrence to the Authority;

(g) "Authority" means the National Electric Power Regulatory Authority established under the Act;

(h) "billing cycle" means energy recorded by the meters in a period of thirty days;

(i) "distributed generation facility" means a facility set up by a prosumer using solar, wind or biogas energy resource for generation of electricity up to 1 MW;

(j) "distributed generation" means electrical power generation by solar, wind or biogas that is interconnected to the distribution system of the licensee at interconnection point;

(k) "distribution system" means the distribution facilities situated within the service territory owned or operated by the licensee for distribution of electric power including, without limitation, electric lines or circuits, electric plant, meters, interconnection facilities or other facilities operating at the distribution voltage, and shall also include any other electric lines, circuits, transformers, sub-stations, electric plant, interconnection facilities or other facilities determined by the Authority as forming part of the distribution system, whether or not operating at the distribution voltage.

(l) "fault" means an equipment failure, conductor failure, short circuit, or other condition resulting from abnormally high or low amounts of current from the power system;

Definition of Fee is required, earlier it was for licenses above 25kw and now Schedule IV gives an impression that it will be required for all installation.

(m) "grid code" means the code prepared by the system operator under section 23H of the Act and approved by the Authority;

- (n) "interconnection facilities" means the equipment, including, without limitation, electrical lines or circuits, transformers, switch gear, safety and protective devices, meters or electrical plant, used for interconnection services;
- (o) "interconnection point" means the point where the metering, installation and protection apparatus of the distributed generator is connected to the distribution system of the licensee;
- (p) "kWh" means kilowatt hour;
- (q) "licensee" shall mean an entity holding a distribution license and a supplier license under the Act;
- (r) "MW" means megawatt;

Definitions of NAPPP and NAEPP are necessary

- (s) "prosumer" means an applicant who has entered into an agreement with licensee for distributed generation; and
- 2) The words and expressions used but not defined in these regulations shall have the same meaning as are assigned to them in the Act.

APPLICATION AND INTERCONNECTION PROCESS

3. Application process for interconnecting distributed generation facility.— (1) Subject to sub-regulation (2), any applicant who meets the requirements of these regulations shall be eligible for submitting an application to a licensee as specified in Schedule-II:

Provided that the licensee shall be bound to provide information and Authority's approved documents in response to the request from applicant free of cost within two working days.

(2) The capacity of a proposed distributed generation facility shall not exceed the sanctioned load of the applicant's premises:

Provided that the Authority may revise the capacity of proposed distributed generation facilities under this sub-regulation (2) at any time.

(3) An applicant proposing to install a distributed generation facility with an installed capacity of 250 KW or above shall be obligated to conduct and submit a load flow study carried out through the licensee or any reputable consultant registered with Pakistan Engineering Council.

(4) Application, along with necessary documents, shall be submitted by applicant to licensee.

(5) Within five working days of receiving an application, the licensee shall acknowledge its receipt and inform the applicant whether the application is complete in all respect:

Provided that in case of any missing information or documents the applicant shall provide the same to licensee within three working days of being informed by licensee.

Provided further that the ~~licensee~~ licensee shall not entertain any application if the distributed generation capacity connected to a particular distribution transformer has reached 80% of its rated capacity.

(6) Upon being satisfied that the application is complete in all respects, the licensee shall perform an initial review to determine whether the applicant qualifies for interconnection facility, or may qualify subject to additional requirements:

Provided that the initial review shall be completed within fifteen working days.

(7) In case the initial review reveals that the proposed facility is not technically feasible, the licensee shall return the application and communicate the reasons to the applicant within three working days after the completion of initial review.

(8) If the licensee is satisfied that the applicant fulfills all the requirements of these regulations, then the licensee and the applicant shall enter into an agreement within seven working days and licensee shall send a copy of the agreement to the Authority within seven working days of the signing of the agreement.

(9) Within seven working days of execution of the agreement, the licensee shall issue the connection charge estimate to the prosumer for the proposed interconnection facility up to the interconnection point including the metering installation.

(10) The prosumer shall make the payment of connection charge estimate within seven working days of its issuance.

(11) The licensee shall install and commission the proposed interconnection facility within fifteen working days of the payment of demand notice by the prosumer.

Provided that the billing arrangement shall commence upon accord of concurrence to the prosumer in accordance with regulation 4.

4. Concurrence. — (1) Notwithstanding anything contained in the applicable documents, a prosumer shall seek concurrence of the Authority in accordance with sub-regulation (2):

Provided that the prosumer shall be required to obtain afresh **concurrence from the Authority** prior to any modification in the technical parameters of the distributed generation facility **Currently no concurrence from the Authority is required for below 25kw, if yes, then why?**

(2) Licensee shall forward the application for accord of concurrence to the Authority as specified in Schedule-III along with following:

(a) agreement;

(b) evidence of deposit of fee as may be specified by the Authority in Schedule-IV; **Is this fee also applicable for below 25kw?** and

(c) an affidavit by prosumer as specified in Schedule-V. **Requirement of an affidavit from Oath Commissioner is absurd because signing authority does this blindly and it is just a paperwork and adds to the cost.**

(3) The Authority may, on receipt of the application and the documents specified in sub-regulation (2), accord a concurrence to the prosumer within seven working days after receipt of requisite documents.

(4) In case the prosumer fails to commence distributed generation within **six months** of grant of concurrence, it shall be required to obtain fresh concurrence. **Three months is more than sufficient period to begin generation.**

5. General powers, rights and obligations of the licensee.—(1) A licensee shall,

(a) allow any of its consumers to establish distributed generation facilities to be interconnected with its distribution system using either (i) **a standard meter capable of registering the flow of electricity in two directions, or (ii) two separate meters one for selling electricity to the licensee and other for purchasing electricity from the licensee.**

(b) enter into an agreement with the applicant, and shall grant interconnection approval in accordance with these regulations:

Provided that the approval of interconnection facility shall not be **unreasonably withheld; please specify the period such as 7 working days**

(c) have the right to review the design of a distributed generation facility and interconnection facilities and to inspect the same prior to the commencement of parallel operation with its distribution system and may require the prosumer to make modifications as necessary to comply with the requirements of these regulations; and

- (d) the licensee shall introduce necessary validation checks to monitor the unlawful extension of the distribution generation facility. Needs clarity not to overburden the Prosumer.
- (2) A licensee may limit the operation and/or disconnect or require the disconnection of a distributed generation facility from its distribution system at any time, with or without notice, in the event of fault. **Without notice is too harsh perhaps 7 working days' notice unless it could cause damage to licensee's installation. Also once the fault is removed the connection should be restored.**
- ~~(3) A licensee may also limit the operation and/or disconnect or require the disconnection of distributed generation facility from its distribution system upon the provision of thirty days written notice for the conditions which include as follows:~~
- ~~(a) to allow for routine maintenance, repairs or modifications to the distribution system of the licensee.~~
- ~~(b) upon licensee's determination that distributed generation facility is not in compliance with these regulations; and~~
- ~~(c) upon termination of the agreement or expiry of the term of the agreement.~~

In the presence of 2 above 3 in my view is not required since after investing a large sum towards installation of system disconnection will cause heavy financial loss to the Prosumer.

6. Rights and obligations of the prosumer. — (1) A prosumer shall operate and maintain its distributed generation facility and interconnection facilities in accordance with prudent electrical practices.

(2) The prosumer shall not have any right to utilize licensee's interconnection facilities for the sale of electricity to any other person. **I propose that instead of getting Net Metering Benefit in case, Prosumer be given an option to donate the units to needy and poor such as widows through approved Not for Profit organization who shall coordinate with licensees.**

TERM OF AGREEMENT, TERMINATION OF AGREEMENT AND DISPUTE RESOLUTION

7. Term of agreement and conditions.— (1) The term of the agreement between prosumer and licensee shall be five years with effect from date of commissioning of distributed generation facility.

(2) At the expiry of the initial term, the agreement may be renewed between the prosumer and the licensee for another term of five years and so on with mutual consent of the licensee and prosumer.

~~**8. Termination of agreement.—** (1) The prosumer may terminate the agreement upon thirty days written notice if it decides to discontinue the sale of electricity to the licensee.~~

~~(2) The licensee may terminate the agreement upon thirty days written notice subject to prior approval of the Authority. Having invested a large sum towards installing a system, the Prosumer, will not discontinue the sale of electricity and therefore by insertion of this clause is giving a power to the Licensee to terminate the agreement . Hence Termination clause may please be deleted.~~

~~(3) All rights and obligations accrued up to termination shall continue in force upon termination~~

DISTRIBUTED GENERATION FACILITY DESIGN AND OPERATING REQUIREMENTS

9. Protection requirements.— (1) The protection and control diagrams for the interconnection of the prosumer shall be in accordance with the provisions of the grid code and applicable documents and approved by the licensee prior to commissioning of the proposed interconnection facilities and a single line diagram as specified in Schedule-VII.

(2) The prosumer shall be responsible for the installation of equipment, including, without limitation, electrical lines or circuits, transformers, switch gear, safety and protective devices, meters or electrical plant, to be used for interconnection;

Provided that, if the prosumer is unable to install equipment, including, without limitation, electrical lines or circuits, transformers, switch gear, safety and protective devices, meters or electrical plant, used for interconnection, the licensee may execute the requisite work in case the prosumer offers to deposit the cost to be incurred on the requisite work at mutually agreed terms.

(3) The protective functions shall be equipped with automatic means to prevent reconnection of the distributed generation facility with the distribution facilities of the licensee:

Provided that the service voltage and frequency is of specified setting and is stable and mutually agreed between the licensee and the prosumer.

(4) The prosumer will furnish and install a manual disconnect device that has a visual break to isolate the distributed generation facility from the distribution facilities.

(5) The grid connected inverters and generators shall comply with Underwriter Laboratories UL 1741 standard (Inverters, Converters, Controllers and Interconnection System Equipment for Use with Distributed Energy Resources) which addresses the electrical interconnection design of various forms of generating equipment, IEEE 1547 2003, IEC 61215, EN or other international standards.

Licensee should check and approve all the items before procurement by the Prosumer.

10. Prevention of interference.— (1) The prosumer shall not operate such equipment that superimposes upon the distribution system a voltage or current that interferes with licensee's operations, service to its consumers, or communication facilities.

(2) In the event of such interference, the prosumer must diligently pursue and take corrective action at its own expense after being given notice ~~and reasonable time~~ **within 7 working days** to do so by the licensee.

(3) On account of any failure on part of the prosumer to take timely corrective action, the licensee may, without liability, disconnect the distributed generation facility from the distribution system, in accordance with these regulations.

11. Voltage and frequency range.— A variation of $\pm 5\%$ and $\pm 1\%$ is permissible to the nominal voltage and frequency respectively.

INTERCONNECTION FACILITY FINANCING

12. Responsibility for costs of interconnecting a distributed generation facility. — (1) Prosumer shall be responsible for all costs associated with interconnection facilities up to the interconnection point including metering installation.

(2) The prosumer shall also be responsible for any costs ~~reasonably~~ **this is subjective and need to be defined** incurred by licensee in providing, operating, or maintaining interconnection facilities and distribution system improvements required solely for the interconnection of the distributed generation facility with licensee's distribution system.

(3) In case of non-availability of meter(s) with licensee, the prosumer may procure such meter(s) directly subject to testing by licensee, before installation.

METERING AND BILLING

13. Metering requirements.— (1) The equipment installed for metering shall be capable of accurately measuring the flow of electricity in two directions:

~~Provided that in case two separate meters are installed, the energy metering calculation shall yield the same result as when a single meter is used.~~ In this era of technology only single smart energy meter should be installed.

(2) The interconnection facility including meter, shall meet all safety and protection requirements that are necessary to assure safe and reliable operation of the distributed generation facility when connected to the distribution system of the licensee ~~and that have been approved by the Authority.~~ **Regret to say that Authority is getting involve in micro management.**

(3) ~~The meter reading shall be carried out preferably through hand held units (HHU) and through automated means as directed by the Authority from time to time.~~ **Reading through handheld devices will lead to mal practices. Hence use of single smart energy meter shall be mandatory**

14. Billing.— (1) At the end of each billing cycle, following the date of interconnection of distributed generation facility to its distribution system, the licensee shall raise its bill after taking into account the electricity generated and consumed by the prosumer under a net billing arrangement as follows:

- (a) the kWh supplied by licensee to prosumer, shall be billed in accordance with the applicable tariff.
- (b) the kWh supplied by prosumer to the licensee, shall be billed in accordance with the national average energy purchase price.

Explanation: “net billing arrangement” means an arrangement under which electricity generated by distributed generation facility of prosumer is purchased by the licensee and the licensee raises the bill on the prosumer for his consumption at the applicable tariff, after giving credit for electricity supplied by prosumer to the licensee at the national average energy purchase price.

(2) In case the billed amount of the kWh supplied by prosumer exceeds the billed amount of kWh supplied by licensee, the net billed amount shall be credited against prosumer’s next billing cycle or shall be paid by the licensee to the prosumer quarterly. **In case prosumer wishes not to avail the credit he shall inform the licensee 30 days before the commencement of quarterly billing cycle to transfer his surplus units to a Not-for-Profit Organization who will donate to needy and poor.**

(3) The Authority may revise the rate provided in sub-regulation (1) during the subsistence of the agreements shall be deemed incorporated in the agreement **subject to inviting public comments and public hearing.**

(4) Power of the Authority to give directions, instructions and guidelines.— (1) For carrying out the purposes of these regulations, the Authority may issue directions, instructions and guidelines to the prosumer and the licensee, in the form and manner determined by the Authority, **subject to inviting public comments and public hearing** which shall be complied with by the prosumer and the licensee.

(5) The Authority may, on representation made to it or on its own motion modify or cancel any direction, instruction or guidelines issued under sub-regulation (1) and in so modifying or cancelling any direction, instruction or guidelines may impose such conditions as it deems fit **subject to inviting public comments and public hearings.**

15. Power to require information.—The Authority may, at any time, by notice in writing require any director and officer of the licensee and/or the prosumer, generally or in particular to furnish it within the time specified therein or such further time as the Authority may allow, with any statement or information and without prejudice to the generality of the foregoing power, may call for information, at such intervals as the Authority may deem fit.

16. Resolution of disputes. ---Any dispute or disagreement between prosumer and licensee relating any matter arising out of, or in connection with, the activities covered under the regulations shall be submitted for decision to the Authority.

17. Penalty for failure, refusal to comply with, or contravention with any provision of the regulations.— If any person fails or refuses to comply with, or contravenes any of the provisions of these regulations or any direction or order passed by the Authority under these regulations or knowingly or wilfully authorizes or permit such failure, refusal or contravention, he shall be punishable with a penalty as provided in the Act.

18. Power to relax.—The Authority may by general or special order, for reasons to be recorded in writing, after giving an opportunity of hearing to the persons likely to be affected, may relax any of the provisions of these regulations on its on motion or on an application made before it by an interested person.

19. Power to remove difficulty.— If any difficulty arises in giving effect to the provisions of these regulations, the Authority may, by general or specific order, make such provisions as may appear to be necessary for removing the difficulty.

20. Savings and Repeal.— (1) The National Electric Power Regulatory Authority (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015 shall stand repealed upon coming into force of these regulations.

(2) Notwithstanding the repeal effected by these regulations, nothing shall affect or be deemed to affect, the licence issued and agreement executed under the repealed regulations before commencement of these regulations ~~except the billing shall be in accordance with regulation 14 commencing from the billing cycle subsequent to the month in which these regulations come into effect; Those prosumers having valid licenses are legally entitled to all the provision of Net Metering Regulations 2015 including netting of units and hence this amendment.~~

Provided that distributed generators having the valid agreements executed under the repealed regulations, shall be billed in accordance with the national average power purchase price till the expiry of the term of their agreement and thereafter shall be billed in accordance with the national average energy purchase price for all future renewals **except that in case of surplus units if prosumer wishes not to avail the credit he shall inform the licensee 30 days before the commencement of quarterly billing cycle to transfer his surplus units to a Not-for-Profit Organization who will donate to needy and poor.**

(3) Upon expiry of the term of the agreement executed under the repealed regulations, any extension in the agreement shall be in accordance with these regulations and the arrangement will be brought in conformity with these regulations.

Explanation: For the purpose of this regulation the term “distributed generator” includes any person undertaking distributed generation under the repealed regulations.

Schedule-I

[See Regulation 2 (1) (b)]

Distributed Generation Interconnection Agreement (1 KW to 1MW)

The Distributed Generation Interconnection Agreement (the "Agreement"), is made and entered in to this _____ (day) of _____ (month), _____ (year) by and between _____ hereinafter called "Licensee" and _____ hereinafter called the "Applicant". Applicant shall be 3 phase 400V or 11 kV Licensee's consumer. Licensee and the Applicant are hereinafter collectively referred to as the "Parties" and individually as a "Party".

Recitals

- A. Licensee is the owner of the electric distribution system serving _____ [Insert legal description of property or address] "Licensee's Distribution System"
- B. Applicant desires to install a distributed generation (DG) facility or energy storage device using _____ (solar, wind or biogas) energy resources with a capacity equal or greater than 1 KW but no more than 1 MW, including related interconnection equipment (the "DG Facility") and to interconnect the DG Facility to the Licensee's distribution system.
- C. Licensee has previously reviewed and approved Applicant's DG Interconnection Applicant Form dated _____, and supporting materials (the "Application").
- D. Applicant wishes to interconnect the DG Facility to Licensee's distribution system and Licensee is willing to permit such interconnection subject to the terms and conditions set forth: (1) the completed Application approved by Licensee; (2) this Agreement.
- E. No agency or partnership is created with the interconnection of the applicants DG Facility.

Agreement

NOW THEREFORE, in consideration of the foregoing Recitals and for good and valuable consideration, the Licensee and Applicant agree as follows:

1. Design Requirement

The DG Facility shall be installed in compliance with National Electric Power Regulatory Authority (Prosumer) Regulations, 2025.

2. Applicant's Representations and Warranties

Applicant represents and warrants that:

- a. the DG Facility is fully and accurately described in the Application;
- b. all information in the Application is true and correct;
- c. the DG Facility shall be installed to Licensee's satisfaction;
- d. applicant has been given warranty information and an operation manual for the DG Facility;
- and
- e. applicant has been adequately instructed in the operation and maintenance of the DG Facility.

3. Interconnection Disconnect Switch

The Licensee may require that the Applicant furnish and install an interconnection disconnect switch that opens, with a visual break, all underground poles of the interconnection circuit. The interconnection disconnect switch shall be rated for the voltage and fault current requirements of the DG Facility, and shall meet all applicable IEC, IEEE Standards, as well as applicable requirements of the Grid Code. The switch enclosure shall be properly grounded. The interconnection disconnect switch shall be accessible at all times, located for ease of access of Licensee personnel, and shall be capable of being locked in the open position. The Applicant shall follow the Licensee's recommended switching, clearance, tagging, and locking procedures.

4. Modifications to the DG Facility

Applicant shall notify Licensee of plans for any material modification to the DG Facility by providing at least forty working days of advance notice. "Material Modification" is defined as any modification that changes the maximum electrical output of the DG Facility or changes the interconnection equipment. The notification shall consist of a completed, revised Application and such supporting materials as may be reasonably requested by Licensee. Applicant agrees not to commence installation of any material modification to the DG Facility until Licensee has approved the revised Application and the Authority shall accord fresh concurrence for the facility.

5. ~~Insurance, Indemnification, Liability~~

~~5.1 Prosumer shall obtain and maintain appropriate insurance for third-party personal injury and general commercial liability.~~

~~5.2 Each party as indemnitor shall defend, hold harmless, and indemnify the other party and the directors, officers, employees, and agents of the other party against and from any and all loss liability, damage, claim, cost, charge, demand, or expense (including any direct, indirect or consequential loss, liability, damage, claim, cost, charge, demand, or expense, including attorneys' fees) for injury or death to persons, including employees of either party and damage to property, including property of either party, arising out of or in connection with (a) the engineering, design, construction, maintenance, repair, operation, supervision, inspection, testing, protection or ownership of the indemnitor's facilities, or (b) the making of replacements, additions, betterments to, or reconstruction of the indemnitor's facilities. This indemnity shall apply notwithstanding the active or passive negligence of the indemnitee. However, neither party shall be indemnified hereunder for its loss, liability, damage, claim, cost, charge, demand, or expense resulting from its sole negligence or willful misconduct.~~

~~5.3 The indemnitor shall, on the other party's request, defend any suit asserting a claim covered by this indemnity and shall pay for all costs, including reasonable attorney fees, that may be incurred by the other party in enforcing this indemnity.~~

~~5.4 The provisions of this section shall not be construed to relieve any insurer of its obligations to pay any insurance claims in accordance with the provisions of any valid insurance policy.~~

~~5.5 Except as otherwise provided in this section, neither party shall be liable to the other party for consequential or remote damages incurred by that party.~~

This is a requirement for industries and IPPs which is being introduced for Prosumers. If required, it should be applicable to those having licenses of 250kW and above wherein third parties are involved.

6. DG Facility commissioning Testing

Applicant shall notify Licensee in writing that installation of DG Facility is complete and that the interconnection equipment is available for testing by Licensee at least fifteen working days –before Applicant interconnects the DG Facility with Licensee's Distribution System. Licensee shall thereupon have the right to test the DG Facility and ensure that DG facility fulfils the safety/quality standards in accordance with SOPs developed by Ministry of Energy for installation of DG Facility. Licensee shall also have the right to witness any testing by Applicant of the DG Facility. Any Licensee testing of the DG Facility shall be completed within ten working days. After the testing which is to the satisfaction of both parties, the DG facility may be interconnected with the distribution system of Licensee to be witnessed by representatives of both parties within thirty eight days.

7. Access to DG Facility

Applicant shall permit Licensee's employees and agents to enter the property on which the DG Facility is located at any reasonable time for the purposes of inspecting and/or testing Applicant's DG Facility to ensure its continued safe and satisfactory operation and the accuracy of Licensee meters. Such inspections shall not relieve Applicant from its obligation to maintain the DG Facility and any related equipment owned by Applicant in safe and satisfactory operating conditions. Licensee shall have the right to witness any testing by Applicant of the DG Facility.

8. Temporary Disconnection of a DG Facility

Licensee may limit the operation and/or disconnect or require the disconnection of a DG facility from Licensee's Distribution System at any time, with or without notice, in the event of fault. Licensee may also limit the operation and/or disconnect or require the disconnection of DG facility from Licensee's Distribution System upon the provision of 30 days written notice for the conditions to allow for routine maintenance, repairs or modifications to Licensee's Distribution System.

9. Amendments: Non-Waiver

Any amendment or modification to this Agreement must be in writing and executed by Applicant and Licensee. The failure of Applicant or Licensee to insist on performance by the other Party of any provision of this Agreement shall not waive the right of the Party who failed to insist on performance to enforce the same provision at a later time.

10. Term and Termination of Agreement

The term of Agreement between Prosumer and Licensee shall be five years with effect from the date of commissioning of DG facility. At the expiry of initial term, the Agreement may be renewed between Prosumer and Licensee for another term of five years and so on unless the Parties terminate the Agreement.

~~a. Licensee may limit the operation and/or disconnect or require the disconnection of a DG Facility from Licensee's Distribution System at any time, with or without notice, in the event of fault. Licensee may also limit the operation and/or disconnect or require the disconnection of DG facility from Licensee's Distribution System upon the provision of 30 days written notice for the conditions which including as follows:~~

- ~~— To allow for routine maintenance, repairs or modifications to Licensee's Distribution System;~~
- ~~— Upon Licensee's determination that DG facility is not in compliance with the regulations;~~
- ~~— Upon termination of the Agreement.~~

- ~~b. This Agreement may be terminated in accordance with the Regulations.~~
- ~~c. The Prosumer may terminate the agreement upon thirty days written notice if the Prosumer determines to discontinue the sale of electricity to the Licensee.~~
- ~~d. The Licensee may terminate the Agreement upon thirty days written notice with the prior approval of the Authority.~~
- ~~e. All rights and obligations accrued up to termination shall continue in force upon termination.~~

Above is already covered under 5. General powers, rights and obligations of the licensee and therein I have offered my comments.

11. Successors and Assigns

- a. Assignment by Applicant: Applicant shall not assign its rights and obligations under this Agreement in whole or in part without the prior written consent of Licensee, which consent shall not be unreasonably withheld or unduly delayed. Licensee may withhold its consent to any proposed assignment if the proposed assignee fails to assume the obligations of Applicant under this Agreement in writing.
- b. Assignment by Licensee. The Licensee shall have the right to assign this Agreement in whole upon written notification to the Applicant.
- c. Successors. This Agreement shall be binding upon the personal representatives, heirs, successors, and permitted assigns of the respective Parties.

12. Applicant and Licensee Signature and Seal

IN WITNESS WHEREOF, Applicant and Licensee have executed this Agreement as of the year and date first set forth above.

Applicant Signature & Date

Licensee's Signature with Seal & Date

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Title

Title

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Witness No. 1 (Name & Signature)

Witness No. 1 (Name & Signature)

--	--

Witness No. 2 (Name & Signature)

Witness No. 2 (Name & Signature)

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Schedule – II
[See Regulation 3 (1)]

Standard Application Form for Licensee

Distributed by	Approved by
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Name & Address of LICENSEE

	National Electric Power Regulatory Authority (NEPRA)
--	---

1. Contact Information-The applicant is the person that is legally responsible for the generating system.

Applicants Name	First Name

CNIC of Applicant/CUIN in case of Company (Copy to be attached)

--	--

Applicant's Mailing Address

Applicant's Phone Number & Email Address

Office	Fax
Cell	Email

Emergency Contact Numbers

--	--

2. Location of Generation System

Address at which proposed DG facility is located

Latitude – Longitude (i.e. 49° 32'06"N—91° 64'18"— optional)

--

3. Applicant/Consumer Reference Number

--

4. Applicant's Ownership Interest in the Generation System

<input type="checkbox"/> Owner	<input type="checkbox"/> Co-Owner	<input type="checkbox"/> Lease	<input type="checkbox"/> Other: _____
--------------------------------	-----------------------------------	--------------------------------	---------------------------------------

5. Primary Intent of the Generation System

<input type="checkbox"/> Onsite Use of Power	<input type="checkbox"/> Distributed Generation
--	---

6. Electricity Use, Production and Purchases

(a) Anticipated annual electricity consumption of the facility or site:	(kWh)/yr.
(b) Anticipated annual electricity production of the generation system:	(kWh)/yr.
(c) Anticipated annual electricity purchases (i.e. (a) minus (b))	(kWh)/yr.

* Value will be negative if there are net sales to Licensee.

7. Installing Contractor Information (If Applicable)

Contractor's Last Name

First Name

Name of Firm

Contractor's Phone Number

E-mail Address

Mailing Address

8. Requested in-service Date

9. Provided one-line Schematic Diagram of the System

☐ Schematic is Attached

Number of Pages

10. Generator/Inverter Information

Manufacturer

Model No.

Version No.

Serial No.

Generation Type (check one)

Generation Type (check one)

☐ Single Phase ☐ Three Phase

☐ Inverter ☐ Other: _____

Name Plate AC Ratings (check one)

☐ _____ kW ☐ _____ kVA ☐ _____ Volts

Primary Energy Source

Note: If there is more than one inverters, attach an additional sheet describing each.

11. Site Plan Showing Location of the External Disconnect Switch (attach additional sheets as needed)

12.

13. Other Comments, Specification and Exceptions (attach additional sheets if needed)

14. Application and Installer Signature

To the best of my knowledge, all the information provided in this application form is completed and correct

Applicant Signature

Date

Installer Signature (if applicable)

Date

Schedule III

[See Regulation 4(2)]

**APPLICATION FOR ACCORD OF CONCURRENCE
NATIONAL ELECTRIC POWER REGULATORY AUTHORITY**

1. Name of Applicant	
1(a) CNIC of Applicant/CUIN in case of Company (Copy to be attached)	
1 (b) Address	
1 (c) Contact Nos	
1 (d) Email Address	
2. Location of DG Facility	
3. Name of Licensee with which the proposed DG Facility is proposed to be interconnected	
4. Size of proposed DG Facility	
5. Approximate monthly energy proposed to be supplied to Licensee (kWh):	
6. Fee to be deposited (Non – Refundable)	

Applicant Signature

--

Date

--

Schedule-IV

[see Regulation 4(2) (b)]

An application for concurrence shall be accompanied with one-time fee of one thousand rupees per kilowatt (Rs. 1000/kW) paid in favour of National Electric Power Regulatory Authority (NEPRA).

Currently Authority issues the licenses above 25kW by charging fee of Rs. 1000 per kW. Does it mean change of policy of charging to all? If yes, why? It is submitted that Authority should engage itself in policy work and licensing should be left between the Licensees and Prosumers. Additionally, Authority must encourage the Licensees to use the fee to outsource inspection to professionals which will create job opportunities.

Schedule – V

[See Regulation 4(2) (c)]

Affidavit

(On non-judicial paper of Rs. 50/-)

~~I/we (name of the Prosumer) hereby confirm that I/we have read the NEPRA (Prosumer) Regulation, 2025 and agree to abide by its stipulations and the contents of the Application are true and correct to the best of my knowledge and belief and nothing has been concealed thereof.~~

This requirement is unnecessary which has not value since Oath Commissioner attest the affidavit by charging a couple of hundred Rupees.

Deponent

Oath Commissioner

DQCL 10:29 ▲ 0.06 (0.45%)

DOKD 225.55 ▼ -3.13 (-1.37%)

FGCL 58.03 ▼ -0.76 (-1.29%)

FFL 22.02 ▲ 0.87 (4.11%)

BR100 19,701
-322 (-1.61%)BR30 62,337
-1640.1 (-2.56%)KSE100 184,410
-2797.2 (-1.49%)KSE30 56,594
-1051.5 (-1.82%)

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OPINION: End of net metering – goodbye to green energy?

Moin M Fudda ONZM. S.I. Published December 22, 2025

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The Federal Government has made a final decision to abolish the Net Metering system for solar installers and replace it with a gross billing policy. For the implementation of this decision, power regulator, NEPRA, has formally issued draft rules.

Deviating from established procedures, NEPRA has not announced any date for a public hearing this time. It is quite possible that after ten years, Pakistan will be the first country to end the net metering after such a short period while neighbouring countries are not only promoting net metering but, in some cases, even allowing neighbours to sell excess electricity to each other.

What is net metering? Under net metering, if a home, shop, or office had a solar system installed, any excess electricity generated during the day was fed back into the grid. When needed, the consumer could draw the same number of units from the grid.



Imported (consumed) and exported (supplied to the grid) electricity units were adjusted at the same rate. This is why millions of consumers, who could no longer bear the ever-increasing electricity prices, were increasingly attracted towards installing solar systems.

Why did the ministry of energy recommend ending net metering? According to officials of the Ministry of Energy, net metering was causing electricity generation companies losses worth billions of rupees, and grid and system costs were not being recovered.

However, on 18th November 2025, Central Power Purchasing Agency (CPPA) CEO Rehan Akhtar while testifying before the NEPRA said that while solar generation is increasing, but this does not have a significant impact on the grid.

According to him, the energy costs had led to a shift to solar power. “They are now consuming more due to solar availability but their offtake from the national grid has not changed. Their withdrawal from the grid is almost stable. They are drawing the same quantities they were drawing earlier,” he said, adding, however, the same could not be predicted about the future.

In fact, the real issue lies in poor government policies, due to which the government is required to make capacity payments amounting to millions of dollars without consuming electricity. The burden of these flawed policies and decisions is now being shifted onto solar users. NEPRA’s decision will reduce the installation of solar systems, which will negatively impact the environment. Unfortunately, the Ministry of Climate Change remains a silent spectator.

What is the new gross billing system? Under the new system, instead of net metering, electricity imported from the grid will be charged at the national tariff (for example, Rs 55 to 65 per unit). Electricity exported from solar systems to the grid will be paid not at the current Rs 24 per unit of National Average Purchase Power Purchase Price (NAPPP), but at around Rs 9 per unit of National Energy Power Purchase Price (NEPPP). Imported and exported units will no longer be netted off against each other; instead, they will be calculated separately, meaning a gross billing system will be enforced.

Ironically, due to flawed policies of officials, the government on the one hand will continue for nearly the next ten years to purchase electricity from solar IPPs at rates exceeding Rs 49 per unit (in dollar terms) and, on the other, solar users will be pushed toward installing batteries, thereby storing excess electricity for personal use rather than selling it cheaply to the grid. At the same time State Bank will be forced to spend millions of additional dollars on importing batteries because of this decision.

What could be the solution? Every Pakistani takes pride in the fact that Prime Minister Shehbaz Sharif has repeatedly emphasized the need to promote solarization. Therefore, to avoid shattering of his vision, the writer respectfully requests the Prime Minister to direct NEPRA not to alter the existing system but, instead, introduce a national carbon emission (CO₂) policy. Under such a policy, net metering consumers could transfer their carbon credits to DISCOs, which could then sell them in international markets to improve their financial indicators.

According to an international survey, Pakistanis are among the most generous people in the world in terms of donations (Zakat and charity). Hence, the Prime Minister is once again requested to intervene and halt NEPRA’s action and simultaneously issue directives to establish “Digital Electricity Units Trust” (DEUT) in every major city.



Through these Trusts solar units voluntarily contributed by solar system installers could be digitally transferred from DISCOS to Not for Profit Organizations who will then pass these on to deserving households, especially to widows, through a well-defined policy and mechanism thereof.

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MOIN M FUDDA ONZM, S.I. >

The writer is founder of Group "Save the Planet via Green Energy"

NEPRA SBP FEDERAL GOVERNMENT ENERGY SECTOR DISCOS CPPA POWER SECTOR
MINISTRY OF ENERGY GREEN ENERGY NET METERING MINISTRY OF CLIMATE CHANGE
DIGITAL ELECTRICITY UNITS TRUST

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-1051.5 (-1.82%)

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MARKETS

Pakistan 'can generate' 40-75mn tons of carbon credits annually worth \$400mn-2.25bn: report

- TI Pakistan report notes country holds substantial potential in carbon markets

BR Web Desk Published September 23, 2025

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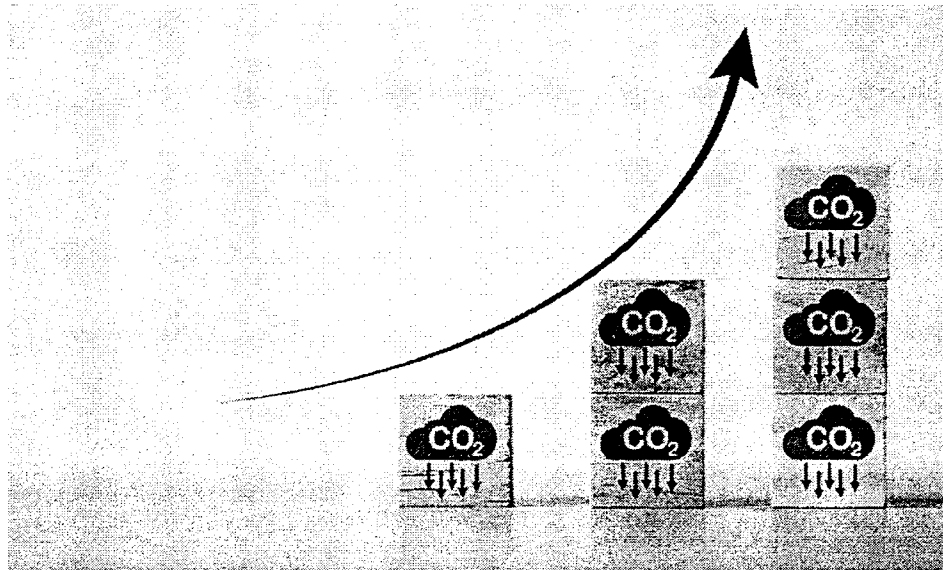


Photo: ASEAN Climate Change and Energy Project website



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Pakistan has the potential to generate 40 to 75 million tons of tradable carbon credits per year, worth \$400 million to \$2.25 billion, said the Transparency International Pakistan in its report on Tuesday.

The TI Pakistan report titled 'Carbon Markets Readiness in Pakistan: Addressing Governance Gaps and Safeguarding Against Integrity Risks' is an assessment of gaps in governance of carbon markets in Pakistan, including identifying challenges and opportunities for achieving high integrity projects based on international best practices.

The report notes that Pakistan holds substantial potential in carbon markets, offering both environmental and economic opportunities.

RUDA to transform Booti dumpsite into carbon credit project

"If even 10-15% of Pakistan's annual greenhouse gas emissions were addressed through carbon projects, Pakistan could generate 40-75 million tons of tradable carbon credits per year. At current voluntary market prices, this translates to a potential revenue stream of USD 400 million to USD 2.25 billion annually for the country," it said.

However, the report emphasises that within the current policy guidelines on carbon markets, a critical disjuncture exists between the high-level aspiration to mitigate climate change, and the on-the-ground, functional architecture needed to operationalise sophisticated instruments like carbon markets in Pakistan. It highlights lack of a clear, consolidated national emissions baseline as a significant barrier to carbon markets in Pakistan.

The report further emphasises that carbon markets are inherently complex and require a high level of technical sophistication in multiple interrelated areas: emissions accounting, monitoring and verification protocols, legal frameworks for carbon ownership and crediting, and the design of market instruments such as registries, caps, and crediting methodologies.

"While overarching policy frameworks are now present, on-the-ground capacity to implement them remains limited. Pakistan needs a dedicated carbon markets team at the Federal Ministry of Climate Change & Environmental Coordination and provincial climate change departments," it maintained.

Executive Director TI Pakistan Kashif Ali highlighted: "Transparency is one of the most pressing challenges in the development of carbon markets everywhere. Without clear and accessible information on how decisions are made, how benefits are allocated, and what safeguards exist for affected communities, trust in these mechanisms runs the risk of being affected. Clear reporting standards, publicly accessible benefit-sharing frameworks, and robust channels for community participation in carbon market projects are critical to the success of Pakistan's carbon markets as well as bridging transparency gap".

Pakistan's mangrove carbon market: \$20m to \$50m annual potential unlocked

The TI Pakistan has provided 10 recommendations to strengthen governance of carbon markets in the country, including:

- A) Establish Robust Data Infrastructure along with developing context-specific baselines for key sectors and project types
- B) Institutionalise Safeguards, Equity, and Public Participation with clear framework for Free, Prior and Informed Consent (FPIC) and Grievance Redressal Mechanisms to resolve conflicts around land rights, benefit sharing, Monitoring Reporting Verification (MRV) disputes, and consent violations
- C) Strengthen Legal and Regulatory Foundations by enacting a Comprehensive Carbon Market Law to serve as the primary legal mandate for all activities related to carbon trading in Pakistan

D) Leverage and Upgrade Existing Institutional Mechanisms through creation of a National Carbon Coordination Council (NCCC), a centralised governance body tasked with overseeing carbon market development and coordinating roles across ministries, provinces, and regulatory agencies.

E) Establish Dedicated Technical Training and Capacity Building Program through vertical and horizontal integration. Vertically, Pakistan requires trained personnel at federal, provincial, and district levels who can implement carbon market operations, such as MRV protocols, benefit-sharing arrangements, registry compliance, and climate finance planning. Horizontally, capacity must be developed across ministries, from the Ministry of Climate Change & Environmental Coordination (MoCC&EC) and the Pakistan Bureau of Statistics (PBS), to the Ministry of Energy, provincial forest departments, and economic planning commissions.

F) Adopt a Phased, Realistic, and Adaptive Strategy through evaluation of promising pilot projects, such as the Lakhodair Landfill Gas Project, the Sapphire Wind Farm, and the Delta Blue Carbon Mangrove Initiative by feeding learnings into regulatory frameworks

G) Strengthen International Linkages for Credibility and Market Access through institutionalising transparency and disclosure such as public platform or registry that provides visibility into carbon market transactions, authorisations, or project-level safeguards.

Chairman TI Pakistan Justice (retd) Zia Perwez said it is hoped that federal and provincial governments, international development partners and civil society stakeholders will take key lessons and recommendations provided in the report to help guide Pakistan benefit better from the carbon markets as strategic tool for climate finance.

CARBON MARKETS TI PAKISTAN REPORT PAKISTAN'S ANNUAL GREENHOUSE GAS EMISSIONS
CARBON CREDITS PER YEAR TRADABLE CARBON CREDITS

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DAWN

E-PAPER | JANUARY 12, 2026

Advertisement

Pakistanis among top charity donors, but 42pc unable to give

Khaleeq Kiani | Published January 9, 2026



Labourers read a newspaper as they drink morning tea at a stall on a cold winter morning in Karachi, Pakistan, January 2, 2026. — Reuters

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- **Pakistan Centre for Philanthropy says country ranks 17th out of 101 nations in terms of generosity**
- **27pc non-givers cite lack of affordability as main reason**

ISLAMABAD: Religious motivation for charity puts Pakistanis among the top donors in the world, but 42 per cent of people express their inability to donate due to financial constraints.

This has been reported by the Pakistan Centre for Philanthropy (PCP), a non-governmental organisation, based on The World Giving Report (WGR) 2025 and its own surveys and evaluation of over 5,000 not-for-profit organisations in the country.

The PCP says about two-thirds (73pc) of Pakistanis donated money in 2024 for various social causes.

“This is above the global average of 64pc and the continental average of 69pc. This is reflective of the generous impulse of charitable giving for causes people care for,” the PCP says in its ‘Giving in Pakistan 2025’ report.

Interestingly, Nigeria scores the highest at 89pc, while Japan ranks the lowest with 16pc.

As such, Pakistan ranks 17th out of 101 countries for how generous its people are and also places 17th in terms of the proportion of income donated.

Pakistan ranks above the global average of 1.04pc despite having an income distribution highly skewed towards the middle- and low-income brackets.

In contrast, volunteering is not a common practice in Pakistan, as only 16pc of people report having volunteered time in 2024.

This reflects into just 3.5 hours volunteered on average per person, nearly half of the continental average of 7.5 hours and far lower than 8.9 hours of the global average.

The report finds that lack of affordability is the predominant cause of non-giving in all parts of the world, including Pakistan.

Out of the 27pc non-givers, the major reason mentioned for not giving is lack of affordability in Pakistan, compared to 40pc average globally and 35pc in the Asia continent.

However, 18pc of non-monetary givers prefer to give in-kind — in the form of food or other support.

A total of 42pc of people did not donate in 2024 due to lack of affordability.

Major motivations

The PCP notes religious motivation and compassion for a cause as the leading reasons for giving money. Among the people who donated, the top three reasons are religious obligation (58pc), care about a cause (54pc) and a sense of duty to give to charity (49pc).

to a person or family in need, accounting for the highest proportion at 51pc, followed by giving money to charities at 47pc and religious causes at 34pc.

These proportions are all higher than global and continental scores, and the “pattern of giving in Pakistan indicates that faith-based giving and deep compassion for helping a person or family in need runs through every neighbourhood and community”.

The survey also shows that Pakistanis give money frequently with nearly 18pc donating more than 12 times during 2024 and 21pc giving between six and 11 times — both figures are higher than global and continental averages.

“This relatively higher frequency of giving could be attributed to the general trend of donating on religious and cultural occasions, such as [the] festivals of Ramazan, Eid and other religious events.”

Direct giving

Of all money given in 2024, 44.7pc goes directly to people in need, far more than to charities (33.8pc) and to religious reasons (21.5pc.).

This shows that Pakistan’s giving profile leans heavily towards direct giving instead of formalised charity, hence a preference for informal giving to individuals.

Also, the generosity in Pakistan felt like a duty — hard-wired into the culture.

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norms and obligations such as Zakat, Sadaqah and Fitrana

Around 89pc felt “happy” fulfilling this duty, while nearly 70pc felt “very happy”.

The PCP argues that improved credibility and effectiveness of the charity sector could increase donations.

About 32pc of people show more willingness to donate if charities are well-regulated and almost a same proportion are ready to donate if they had more money.

Around 29pc appeared ready to increase their donations if they knew more about how and where their money was spent.

Poverty and religious organisations are the most popular causes in Pakistan, followed by homelessness and disability-related reasons.

Around 39pc of giving goes to the poor, 38pc to religious organisations, 30pc to the homeless and 28pc to people with disabilities.

Pakistanis also trusted their charity organisations more than the regional and global averages.

Overall, the public in Pakistan give a score of 10.4 out of 15 for how much they trust charities, compared to an Asian average of 9.65 and a global average of 9.22.

Published in Dawn, January 9th, 2026

NEWSPAPER



Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:55 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment
Attachments: Nepra Letter final 1.docx

From: Naeem Jan Amin <naeemjan811amin@gmail.com>
Sent: Tuesday, January 13, 2026 11:59 PM
To: registrar@nepra.org.pk
Subject: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

Dear Mr Bhinder, AOA, My views are attached herewith.

Wasim Anwar Bhinder

Date : Friday, December 26, 2025

Registrar Nepra

Nepra Tower, Attaturk Avenue (East) G-5/1, Islamabad.

Subject : Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

Dear Sir,

Reference to your publication regarding Prosumer Regulation 2025 in the newspaper dated 15th December 2025, I am writing as a concerned citizen and existing solar Net metering consumer to formally record my reservations regarding the recently proposed "NEPRA Prosumer Regulations, 2025." While I appreciate the Authority's efforts to ensure grid stability and manage the growing distributed generation capacity, however certain clauses in the draft are highly discouraging for renewable energy adoption in Pakistan.

1. Objection to the Change in Net Metering Mechanism

The shift from the existing Net Metering (unit-to-unit adjustment) to a Net Billing/Gross Metering model is a significant setback. By slashing the buyback rate to the National Average Energy Purchase Price (approx. Rs. 13/unit) while charging retail rates for imports (approx. Rs. 50-60/unit), the financial viability of solar investments for middle-class households is effectively destroyed.

The 2015 Regulations provided a fair incentive for citizens to invest their own capital to bridge the national energy gap. I request the Authority to revert to the original Net Metering mechanism to maintain consumer trust and continue the momentum of Green Energy.

2. Acceptance of Technical Constraints

I recognize that the rapid growth of solar generation poses technical challenges to the aging distribution infrastructure. In this regard, I find the following proposed changes to be reasonable and acceptable:

- Sanctioned Load Clause: Limiting the solar system capacity to 100% of the Sanctioned Load (instead of 150%) is a fair measure to ensure that the household's export does not exceed its authorized grid connection capacity.
- Transformer Capacity Clause: Restricting new connections once a transformer reaches 80% of its capacity is a logical technical safeguard to prevent local grid failures and protect equipment.

3. Re-evaluation of IPP Agreements and Capacity Payments

Beyond the technicalities of net metering, the primary driver behind the current energy crisis is the existence of unfair and unsustainable agreements with Independent Power Producers (IPPs). For decades, the national economy has been bled dry by "Take-or-Pay" clauses, where the government is forced to pay billions in "capacity charges" for electricity that is never actually produced or consumed. These dollar-indexed returns and sovereign guarantees have created an artificial tariff hike that is killing industrial productivity and pushing the common man below the poverty line. It is high time the

government takes decisive steps to renegotiate or terminate these lopsided contracts, transitioning instead to a "Take-and-Pay" model. We cannot expect the public to subsidize the inefficiencies of the power sector and the excessive profits of a few influential groups while the rest of the country's economy remains in a state of paralysis.

4. Contribution to Reducing the National Fuel Import Bill

It is critical to acknowledge that Net-Metering consumers are not a burden, but a major contributor to the national exchequer. In FY 2024-25 alone, net-metered solar capacity in Pakistan crossed 5,800 MW, significantly reducing the need for expensive thermal power generation. By generating clean energy during peak daylight hours, consumers directly displace electricity that would otherwise be produced using imported FO (Furnace Oil) and RLNG (Regasified Liquefied Natural Gas). Recent data indicates that this decentralized generation has helped the country save billions in foreign exchange and even contributed to negative Fuel Charge Adjustments (FCA), providing relief to all grid consumers. Discouraging net metering now would essentially force the country back toward a heavy reliance on imported fossil fuels, further draining our precious foreign exchange reserves and worsening the trade deficit.

5. Environmental Survival and the Transition to Electric Vehicles (EVs)

Finally, it must be noted that Pakistan is already among the countries most vulnerable to climate change, with cities like Lahore and Multan suffering from hazardous smog levels every winter. Slowing down solar deployment by making it financially unviable will force a continued reliance on coal and oil-based power plants, which are primary contributors to particulate matter and poor air quality. Furthermore, the Government's own Electric Vehicle (EV) Policy depends entirely on the availability of economical and clean electricity. If net-metering benefits are withdrawn, the incentive for citizens to switch to EVs will vanish, as charging vehicles from an expensive and "dirty" national grid offers no relief. To achieve a "Clean Green Pakistan" and a smog-free future, the Authority must encourage solar energy as the backbone for an affordable EV charging infrastructure.

6. Recommendations

Instead of penalizing prosumers through reduced buyback rates, I urge NEPRA to:

- Maintain the unit-to-unit adjustment (Net Metering) as per the 2015 policy.
- Enforce strict compliance with Sanctioned Load and Transformer Loading limits to address grid stability.
- Re-evaluate expensive IPP Agreements
- Encourage Solar energy so that we can further reduce our import bill
- Wisely facilitate solar energy consumers to cater to escalating environmental challenges, ensuring that clean energy remains the primary tool for national growth rather than a casualty of regulatory shifts.

The proposed 2025 regulations, in their current form, will stall Pakistan's progress toward its renewable energy targets and increase the burden on already struggling consumers. I hope the Authority will consider these points during the public consultation process.

Yours Sincerely,

Name

CNIC

Mobile

Address

Email

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 3:20 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Concerns to the proposed inequitable Energy Exchange ratio
Attachments: Concerns to the proposed.pdf

-----Original Message-----

From: Naveed Hussain (PA) <pa.slw@siddiqleather.com>
Sent: Tuesday, January 13, 2026 1:51 PM
To: registrar@nepra.org.pk
Cc: musaddiq@siddiqleather.com
Subject: Concerns to the proposed inequitable Energy Exchange ratio

Attn: Registrar Sahib

Dear Sir,
کم ی عل السلام،

Please look into my Concerns to the proposed inequitable Energy Exchange ratio.

Regards

Muhammad Musaddiq



ISO 9001 : 2015
14001 : 2015
CERTIFIED



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Fax: 92-42-37164477, E-mail: sales@siddiqleather.com URL: www.siddiqleather.com

NTN #: 0667413-5

To,

Dated 13-01-2026

The Registrar,

NEPRA Islamabad,

Date:

Subject: Concerns to the Proposed Inequitable Energy Exchange Ratio

Respected Registrar,

We are writing to express our profound concern regarding the proposed amendments to the net-billing regulations, which threaten to make the exchange of solar energy fundamentally unfair for the average citizen. The most alarming aspect of this proposal is the massive disparity it creates between the price at which we buy electricity and the price at which we are forced to sell it. Under the new rates, a consumer would effectively have to export 5 to 6 units of clean solar energy just to offset the cost of 1 unit consumed from the grid at night. This ratio is economically unjustifiable and places an unreasonable burden on households that have invested their own capital to reduce the national energy deficit.

This "5-for-1" exchange logic ignores the technical and economic value that distributed solar provides to the national grid. During the blistering summer months of 2024 and 2025, prosumers provided essential daytime relief to an overstretched system, reducing the need for expensive "peaker" plants fueled by imported oil. By devaluing this contribution so drastically, NEPRA is sending a message that private investment in renewable energy is unwelcome. This policy will stall the momentum of the storage revolution, where we have already seen a surge of 1.25 GWh in battery imports as citizens try to find their own solutions to the energy crisis.

Furthermore, we believe that any regulation which forces a citizen to sell a commodity at a fraction of its market value to a state-backed monopoly (the DISCOs) is a violation of fair trade principles. Prosumers are not the cause of the "capacity payment" crisis: we are the ones providing a solution by generating power at the source. We urge NEPRA to maintain a fair and balanced exchange ratio that reflects the true cost of power and the value of green energy. We request the Authority to withdraw these lopsided amendments and protect the common man from being forced into an exploitative energy relationship.

Sincerely,

Muhammad Musaddiq
CEO / Siddiq Leather Works (pvt) Ltd

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Thursday, 15 January, 2026 1:22 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Comments part 2 : Technical and Practical Comments on Draft NEPRA Regulations and Amendments (2025)

From: Rehan Jawed <rehanjawed01@hotmail.com>
Sent: Wednesday, January 14, 2026 10:11 PM
To: Registrar <registrar@nepra.org.pk>
Subject: Comments part 2 : Technical and Practical Comments on Draft NEPRA Regulations and Amendments (2025)

The Registrar,

NEPRA

A. Cross-Cutting Technical and Consumer Protection Issues

1. Absence of a Mandatory Consumer Bill Impact Test

The draft regulations do not require a quantified assessment of hidden or indirect impacts on consumer tariffs. This creates a systemic risk where selective approvals, exemptions, or alternative supply arrangements can shift fixed costs and capacity payment burdens onto remaining consumers without transparency.

It is recommended that a mandatory condition be introduced whereby no concurrence, licence, connectivity approval, or modification becomes effective unless a documented and disclosed consumer-bill impact assessment confirms tariff neutrality or identifies explicit fiscal funding.

2. Lack of Data Transparency from Technical Entities

Increasing reliance on inputs from technical entities without mandatory disclosure of datasets, assumptions, and methodologies undermines regulatory scrutiny. Practical experience demonstrates that stakeholder claims are frequently rejected in hearings without supporting data being provided.

A uniform disclosure obligation must be imposed requiring any rejection, objection, or technical position to be supported by verifiable data sufficient for replication.

B. Draft NEPRA Concurrence Regulations 2025

1. Competing Applicant Selection Without Objective Scoring

The provision allowing selection among competing applicants lacks a published scoring protocol. In practical

terms, this allows non-auditable discretion and risks approval of projects that are not least-cost or system-optimal, with long-term consumer tariff implications.

It is recommended that concurrence be granted only through a standardized scoring framework covering cost benchmarks, system value, interconnection cost responsibility, and implementation risk, with reasons disclosed.

2. Demand Demonstration Detached from System Planning

Demand demonstration is not formally tied to verified system requirements. Acceptance of standalone applicant projections risks excess capacity creation and stranded cost socialization.

Demand should be evidenced through system planning documents, committed offtake, or competitive procurement requirements.

3. Technical Modifications Increasing Consumer Exposure

While fresh concurrence is required for modifications, there is no prohibition on approving changes that worsen efficiency or increase cost exposure.

Any modification increasing heat rate, auxiliary consumption, outage risk, or compliance cost should be disallowed unless borne entirely by the applicant.

C. Draft NEPRA Technical Standards for Grid Connectivity Regulations 2025

1. Absence of Enforceable Timelines

The regulations prescribe procedures but do not impose binding timelines on transmission and distribution licensees. In practice, this enables delays that increase system inefficiency and downstream consumer costs.

Mandatory timelines, deemed progression, and publication of queue positions and study outcomes should be introduced.

2. Tripartite Agreements and Accountability Dilution

Tripartite arrangements risk diffusion of responsibility. A single lead entity must be designated with enforceable obligations and penalties.

3. Access, Cybersecurity, and Auditability

Requirements for facility access must include logged access controls, cybersecurity safeguards, and audit trails to prevent system risks ultimately borne by consumers.

4. Interim Operation During Disputes

Dispute resolution without interim operating provisions leads to deadlocks. Provisional interconnection arrangements should be allowed pending adjudication.

5. Symmetric Penal Provisions

Penalties must explicitly apply to licensees for unjustified delays, discriminatory treatment, data withholding, or arbitrary curtailment.

D. Amendments to Electric Power Supplier Licensing Regulations 2022 (On-Site Supply)

1. Risk of Cost Shifting Through Private Supply

Mutually agreed pricing without ring-fenced settlement exposes the grid to unpaid balancing and contingency risks.

On-site suppliers and bulk consumers must bear all system costs they cause, without socialization.

2. Backup and Fixed Charges Methodology Gap

Backup and standby charges are undefined and discretionary, posing the highest consumer risk.

A published, audited backup charge methodology must precede any licensing, prohibiting double recovery and limiting charges to avoidable system costs.

3. Case-by-Case Eligibility Discretion

Case-to-case eligibility enables unequal treatment and uncertainty.

Eligibility must be governed by notified, objective criteria including consumer tariff neutrality.

4. Blanket CTBCM Exclusion

A complete prohibition from competitive market participation may reduce efficiency.

Conditional participation may be allowed subject to ring-fencing, imbalance responsibility, and settlement discipline.

E. Amendments to AMEC Regulations 2021

1. Metering Access and Data Governance

Access to metering systems without data governance creates privacy and dispute risks.

Requirements must include certified metering, audit trails, access controls, and consumer consent.

2. Demand Pattern Submissions

Demand and consumption data should be standardized for system modeling and not used as a discretionary barrier.

3. Emergency Protocols and SoLR Transition

Emergency provisions must ensure automatic fallback to Supplier of Last Resort with predefined charging rules, preventing cost spillover to general consumers.

F. Consolidated System-Level Recommendation

A Consumer Cost Impact Registry should be established for all concurrences, licences, connectivity approvals, and backup charge determinations, disclosing expected system cost impacts, datasets used, and cost allocation responsibility.

Any provision enabling hidden cross-subsidy, opaque discretion, or unquantified consumer cost exposure should be revised or rejected prior to notification.

Rehan Javed.

From: Registrar <registrar@nepra.org.pk>
Sent: Thursday, 15 January, 2026 11:28 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: IPS Recommendations on the Draft NEPRA (Prosumer) Regulations, 2025
Attachments: NEPRA Draft Regulation Response Jan 14, 2026.docx; Cover Letter - Recommendations on Draft NEPRA Regulations (Prosumers)2025 Jan 14, 2026.pdf

From: Shafaq Sarfraz <shafaq@ips.net.pk>
Sent: Wednesday, January 14, 2026 8:36 PM
To: registrar@nepra.org.pk
Subject: IPS Recommendations on the Draft NEPRA (Prosumer) Regulations, 2025

Mr. Wasim Anwar Bhinder,
Registrar, National Electric Power Regulatory Authority (NEPRA),
Islamabad

Assalam o Alaikum,

I hope this email finds you well. On behalf of Institute of Policy Studies (IPS), Islamabad, this email is intended to formally submit recommendations on the Draft NEPRA (Prosumer) Regulations, 2025, in response to NEPRA's public consultation announcement. IPS (www.ips.org.pk) has been deeply engaged in analyzing Pakistan's economic structure and actively contributes to policy discussions and continues to advocate for a balanced, inclusive, and sustainable energy transition.

This submission, prepared by IPS' Working Group on Energy, Climate, and Water, is offered in a constructive spirit, recognizing NEPRA's responsibility to safeguard grid stability, ensure the financial viability of distribution companies, and maintain fairness across consumers. It responds to the proposed transition from net metering to net billing, which has emerged amid mounting fiscal and operational pressures within the power sector.

IPS acknowledges that net metering has played a facilitative role in accelerating rooftop solar adoption, delivering benefits such as reduced electricity costs for prosumers, localized generation, lower transmission and distribution losses, partial peak demand relief, fuel savings, and progress toward climate commitments. At the same time, IPS notes that the challenges now attributed to net metering are rooted in deeper, long-standing structural weaknesses, including distribution inefficiencies, demand stagnation, fixed capacity payment obligations, and infrastructure constraints.

Accordingly, this document serves two interlinked purposes. First, it presents practical and equitable recommendations, if undertaken, to ensure that any transition to net billing is implemented in a fair, orderly, and predictable manner. Second, it underscores that regulatory adjustments to prosumer arrangements are, at best, short-term interventions and cannot substitute for comprehensive power sector reforms.

The document contains two parts. Part I comprises recommendations, i.e., introducing a transparent fixed system charges for prosumers, providing a transitional adjustment period, incentivizing distributed energy storage, gradual phase-in of export purchase rates, and allowing flexible system sizing. Part II of this document outlines parallel measures required to address systemic inefficiencies and ensure long-term financial and operational sustainability of the power sector.

IPS remains committed to non-partisan, evidence-based engagement in support of Pakistan's national interest and appreciates the opportunity to contribute to this important regulatory process.

Regards,
Shafaq Sarfraz
Head of Operations
Institute of Policy Studies, Islamabad
Contact: 0333 8597122



Date: January 14, 2026

Reference No: IPS/Ch/02/2026

The Registrar,
National Electric Power Regulatory Authority (NEPRA),
Islamabad.

Subject: Recommendations on the Draft NEPRA (Prosumer) Regulations, 2025

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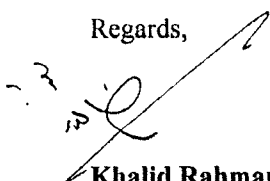
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The document contains two parts. Part I comprises recommendations, i.e., introducing a transparent fixed system charges for prosumers, providing a transitional adjustment period, incentivizing distributed energy storage, gradual phase-in of export purchase rates, and allowing flexible system sizing. Part II of this document outlines parallel measures required to address systemic inefficiencies and ensure long-term financial and operational sustainability of the power sector.

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Regards,


Khalid Rahman,
Chairman, IPS



Institute of Policy Studies
Islamabad

Recommendations on the Draft NEPRA (Prosumer) Regulations, 2025

January 14, 2026

Prepared by IPS Working Group on Energy, Climate, and Water

This document is a submission of recommendations on the Draft NEPRA (Prosumer) Regulations, 2025, in response to NEPRA's public consultation.

Introduction and Context

The Net Metering Regulations, 2015, were introduced as a facilitative policy instrument to promote the adoption of distributed renewable energy by allowing consumers to offset their electricity bills through the export of surplus rooftop solar generation to the grid. The primary objective of the framework was not to create a commercial profit-making opportunity, but rather to enable consumers to partially shield themselves from rising electricity costs while maintaining access to grid supply when required. In effect, the grid functioned as a virtual storage mechanism for prosumers.

Since their introduction, these regulations have played an important role in rooftop solar adoption. However, net metering was not the sole or primary driver of this growth. Rapidly declining global solar module prices, rising grid tariffs, supply reliability concerns, and broader macroeconomic pressures collectively made rooftop solar an increasingly viable alternative for consumers. Net metering served to amplify this trend.

The facilitative structure of the net-metering framework created an environment in which both prosumers and the system benefited. While Prosumers were able to reduce their electricity bills and recover investments within relatively short timeframes by effectively using the grid as a battery, the power system benefited from localized generation, including reductions in transmission and distribution losses, improved voltage profiles, eased pressure during peak demand hours, created employment, reduced fuel imports, and contributed to the country's broader climate commitments.

As with any enabling policy introduced to catalyze early-stage adoption, the expansion of net metering also revealed operational challenges and system constraints over time. While these challenges are indicative of policy lacunas, they also reflect the natural evolution of a framework as penetration levels increase. The national grid, originally designed for one-way power flows, began to experience technical constraints, while the continued application of high export valuations under net metering increasingly shifted fixed system costs onto non-producing consumers. Addressing such emerging distortions requires periodic regulatory recalibration and system upgrades to ensure fairness, reliability, and financial sustainability. The introduction of abrupt changes limits the expected benefits.

In this context, the proposed transition from net metering to net billing can serve as a short-term measure to stabilize the power system. However, achieving sustainability requires the simultaneous implementation of complementary reforms aimed at addressing underlying structural challenges, including inefficiencies within DISCOs, system upgrades, and demand-side growth. When short- and long-term measures are pursued in parallel, both consumers and the power system will benefit, while prosumers are less likely to perceive the transition as a withdrawal of government support for distributed generation, and instead as a corrective step toward ensuring the sustainability and financial viability of the power sector.

In this context, the central policy challenge, therefore, is not whether reform from net-metering to net-billing is necessary, but how it can be designed and implemented in a manner that sustains mutual benefits for prosumers, non-solar consumers, and distribution companies alike.

Part I: Recommendations

In light of the above, the following recommendations are proposed to support a balanced and sustainable transition from net metering to net billing:

1. Introduce Transparent Fixed System Charges for Prosumers

Regulation Reference: *Regulation 14 (Billing)*. “net billing arrangement” means an arrangement under which electricity generated by a distributed generation facility of prosumer is purchased by the licensee and the licensee raises the bill on the prosumer for his consumption at the applicable tariff, after giving credit for electricity supplied by prosumer to the licensee at the national average energy purchase price.”

Recommendation Rationale: The draft regulation establishes net billing with exports credited at the National Average Energy Purchase price (NAEPP) while imports are billed at full retail tariffs. This valuation gap discourages efficient solar sizing and investments and can also erode prosumer trust amid ‘perceived penalties.’

Recommendation: Instead of implicitly recovering unavoidable fixed system charges (system maintenance, capacity payments, T&D Losses, etc.), a clearly defined and reasonable fixed charge should be introduced for prosumers to recover these unavoidable system costs. Charging these costs transparently rather than implicitly through suppressed export prices will enhance trust, improve compliance, and ensure equity between prosumers and non-prosumers. A direct fixed charge promotes cost-reflective tariffs, ensuring prosumers contribute equitably to the grid. This also reflects global practice. For instance, California's NEM 3.0 uses \$15/month fixed fees to stabilize revenues, rebounding solar installations by 15% post-transition.

2. Provide a Transitional Adjustment Period Before Implementation

Regulation Reference: *Regulation 1(2)*, “They shall come into force at once...” meaning the regulations take effect immediately upon notification in the official Gazette, without a built-in buffer for adaptation.

Recommendation Rationale: Immediate implementation could lead to abrupt shifts for prosumers and DISCOs. While Regulation 5(1)(a) allows licensees to use “a standard meter capable of registering the flow of electricity or two separate meters,” there is no specific directive to accelerate smart meter deployment or infrastructure readiness.

The application process in Regulation 3 focuses on quick timelines (e.g., 15 days for initial review and commissioning) but assumes existing infrastructure, without mandating upgrades during a transition. Moreover, abrupt changes can extend solar payback periods from 3-5 years to 7+ under low export rates, deterring investments and causing a “death spiral” where reduced adoption worsens utility revenues.

Recommendation: A transition period of at least 5–8 months should be provided before the complete implementation of net billing. This will allow existing and prospective prosumers to make informed decisions and adapt accordingly. During this period, DISCOs can accelerate the deployment of ‘standard meters’ and supporting infrastructure to ensure operational readiness, as DISCOs have yet to implement SCADA and AMI systems widely. In areas with high solar density, issues like overvoltage and transformer burnouts are a concern because existing infrastructure limits are not being monitored actively.

Given Pakistan’s still modest level of rooftop solar penetration, a gradual approach can help preserve economic activity, maintain investor confidence, and support a stable adjustment for all stakeholders.

3. Incentivize Distributed Energy Storage, Particularly for Small and Medium Consumers

Recommendation Rationale: Battery’s upfront cost is very high, posing a barrier for low-middle-income consumers, particularly. This extends solar paybacks under net billing’s low export rates. Subsidies/financing (e.g., 20-30% rebates or low-interest loans) boost self-consumption, cutting bills 20-40% and avoiding “abrupt withdrawal” of incentives. Moreover, storage shifts solar output to evenings, reducing both midday exports and peak demand, easing transformer overloads and T&D losses.

Recommendation: Encourage battery adoption to reduce excessive exports to the grid, improve self-consumption, and mitigate system stress. Targeted support, such as partial capital subsidies or concessional financing, can be considered for low- and middle-income households to address high upfront costs. This approach balances system interests while avoiding abrupt withdrawal of incentives. For example, Australia subsidized batteries for 50,000 homes to reduce system stress.

4. Grandfathering for Existing Prosumers

Regulation referenced: Regulation (1) (2) & (3), *“The...Net Metering Regulations, 2015, shall stand repealed upon coming into force of these regulations...Provided that distributed generators having the valid agreements executed under the repealed regulations shall be billed in accordance with the national average power purchase price till the expiry of the term of their agreement, and thereafter shall be billed in accordance with the national average energy purchase price for all future renewals. (3) Upon expiry of the term of the agreement executed under the repealed regulations, any extension in the agreement shall be in accordance with these regulations and the arrangement will be brought in conformity with these regulations.”*

Regulation 21 (Savings and Repeal, inferred from context and standard practice) provides partial/limited grandfathering for existing net-metering users. However, no explicit long-term protection or voluntary opt-in is stated. Immediate effect per Reg 1(2) applies the new rules broadly, risking retroactive impacts on ongoing investments.

Recommendation Rationale: Retroactive changes erode confidence, stalling installs and jobs in the solar sector. Additionally, existing users are already fully integrated in the system; abrupt changes would prompt mass modifications, straining Reg. 3 processes and 80% transformer caps.

Recommendation: Full grandfathering under the 2015 Net Metering Regulations for the original contract term (7-10 years) builds lasting policy credibility, reassuring not only current prosumers but also future investors under net billing. In this regard, it is recommended to offer modest voluntary incentives for early transition to net billing (e.g., one-time bill credits, priority battery rebates, or enhanced export adders for 1-2 years) to accelerate grid alignment while maintaining equity and momentum toward Vision 2030.

5. Gradual Phase-In of Export Purchase Rates

Regulation Referenced: *Regulation 14, sub-regulation, “net billing arrangement” means an arrangement under which electricity generated by a distributed generation facility of a prosumer is purchased by the licensee and the licensee raises the bill on the prosumer for his consumption at the applicable tariff, after giving credit for electricity supplied by prosumer to the licensee at the national average energy purchase price.”*

Recommendation Rationale: Phasing export rates, down to NAPP over 1-2 years, with temporary highs for small residential and commercial users (having a system of <10–50 kW), allows adaptation while preserving 4-5year paybacks vs 7+ years under immediate cuts. Moreover, phasing export rates minimizes disruptions and corrects subsidies gradually. A sudden drop in avoided costs will deter investments, extend paybacks, and cause market contraction, worsening cross-subsidies and circular debt issues. Phasing eases this, ensuring sustained growth.

Recommendation: Rather than an immediate shift to avoided-cost pricing, export rates may be phased down over a period of 1-2 years, beginning with a mid-level buyback rate. Higher export rates may be temporarily retained for small residential and commercial systems to preserve investment viability. This gradual adjustment reduces market disruption while steadily correcting cross-subsidies.

6. Allow Flexible System Sizing within Defined Technical Limits

Regulation Referenced: *Regulation 3(2), “The capacity of a proposed distributed generation facility shall not exceed the sanctioned load of the applicant’s premises,”* with a provision allowing NEPRA to revise this at any time. However, there's no built-in flexibility for factors like future loads, such as EVs, or alignment with NDC 3.0 (Pakistan's updated Nationally Determined Contributions under the Paris Agreement, targeting 60% RE and 30% EV adoption by 2030).

Recommendation Rationale: Strict limits ignore 20-30% solar derating from heat/dust (efficiency drops to 70-80% in Pakistan's climate), leading to undersized systems and lost savings (paybacks extend 1-2 years). Reg. 3(3) requires load flow studies for >250kW systems, and Reg. 3(5) caps at 80% transformer capacity, but these are restrictive without provisions for oversizing buffers or EV

integration. Moreover, there is no linkage to EV initiatives or NDCs, risking misalignment with other national endeavors. Flexibility supports EV growth while avoiding billions of rupees in separate grid upgrades.

Recommendation: Reasonable flexibility in system sizing (e.g., 1.3–1.5 times sanctioned load), subject to technical screening, should be permitted. This would accommodate future electrification needs, including electric vehicles, while maintaining grid stability. This is also important to avoid contradiction with other policies, such as EV initiatives and national emission reduction targets committed in NDC 3.0.

Part II: Structural Challenges of Pakistan's Power Sector

This annexure outlines the broader structural challenges underlying the financial and operational stress currently faced by Pakistan's power sector. While the recommendations presented above focus on facilitating an orderly and equitable implementation of the proposed Prosumer Regulations, 2025, the issues discussed below represent longer-term reform priorities that should complement any changes to prosumer arrangements.

Addressing these underlying structural factors is essential for achieving durable affordability, financial sustainability, and energy security. Regulatory measures that operate primarily as short-term adjustments, if not accompanied by deeper reforms, risk generating new distortions over time and may necessitate further regulatory revisions. Such regulatory volatility can undermine investor confidence and discourage sustained commercial and economic activity.

Accordingly, while considering the implementation of net billing regulations, these measures must be situated within a broader reform framework that addresses the following systemic issues in parallel:

a) Distribution Sector Inefficiencies

DISCOs' inefficiencies remain central to sectoral stress. T&D losses averaged 17.6% in FY 2024-25 (down from 18.3% in FY 2023-24, but still exceeding NEPRA's 11% target), contributing PKR 265 billion in losses. Recovery rates claimed to have improved to 96.6% (from 92.4%), yet under-recoveries stand at PKR 132 billion during FY 2024-2025. On the other hand, there are governance challenges, including politicization and theft, that exacerbate circular debt and limit DISCOs' ability to invest in upgrades or debt servicing.

Recommendation: Corporatize and selectively privatize DISCOs; deploy AI-driven smart metering nationwide (reducing losses 10-15%); and enforce performance-based incentives with third-party audits in DISCOs. Without these, net billing provides only temporary relief without addressing systemic bleeding.

b) Capacity Payment Obligations: Increasing Demand

Capacity payments constitute a huge share of Pakistan's power cost. Capacity charges collected annually amount to PKR 2.2 trillion, highlighting a huge burden on the system and consumers alike, ultimately contributing to stagnant demand and underutilized assets. For instance, with an installed generation capacity of 40 GW, the power utilization remains below sixty percent. Low industrial activity and affordability constraints undermine demand growth, spreading fixed costs over a shrinking base.

Recommendation: Expand demand through industrial revival, electrification of transport (e.g., EVs), and improved reliability of the system by reducing outages and losses; improve grid attractiveness by enhancing service quality and recovery to boost power utilization. Moreover, to ensure substantive outcomes, the process of renegotiation of the IPPs contracts must now be advanced with consistent commitment, institutional coherence, and sustained resolve.

c) **Transmission Constraints and Delayed Infrastructure Upgrades**

Constraints in transmission capacity continue to restrict the efficient utilization of low-cost renewable generation resources. Delays in transmission expansion and modernization exacerbate congestion, increase reliance on expensive generation, and limit system flexibility. Investments in grid reinforcement, digitalization, and system planning are essential to improving dispatch efficiency, reducing overall system costs, and enabling a smoother transition toward a more diversified energy mix. Currently, overloaded 500 kV lines force reliance on RLNG plants. On the other hand, due to the lack of utilization of available renewable power, compensation amounts on account of Non-Project Missed Volume (NPMV) are also paid to WPPs.

Recommendation: Accelerate HVDC upgrades and digitalize with SCADA for real-time dispatch. Additionally, use advanced technologies to optimize power flows and reduce congestion, such as IoT for predictive maintenance to detect faults before blackouts, and AI to forecast loads, balancing RE variability.

d) **Net Billing as a Transitional Measure**

In this broader context, the proposed transition from net metering to net billing should be understood as a measure aimed at relieving immediate distributional and financial pressures. While it may help address certain concerns in the short term, it cannot, on its own, resolve structural inefficiencies or restore long-term financial sustainability. Durable outcomes will depend on integrated reforms across governance, infrastructure investment, demand-side development, and market design.

Conclusion

Concisely, by integrating transparent cost recovery, phased implementation, targeted incentives, and technological enablement alongside improvements in DISCO efficiency and necessary grid and transmission upgrades, NEPRA can ensure that rooftop solar continues to expand in a manner that is financially sustainable, socially equitable, and aligned with the country's long-term energy and climate objectives.

-----The End-----

To
The Chairman
National Electric Power Regulatory Authority (NEPRA)
Islamabad, Pakistan

Forwarded by: ☒ For info. action ☐ For information

<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> S. (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Tech.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (L.T.)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTECM)

For kind information, please.
✓ Chairman 2. M (Tech)
✓ S. M (Law) ✓ M (Dev)

Subject: Concerns and Suggestions Regarding the Proposed Net Metering Policy

Respected Sir,

I am writing to formally express serious concerns regarding the newly proposed net metering policy, particularly the shift towards gross metering, and its potential negative impact on Pakistan's renewable energy goals and consumer confidence.

The primary motivation for residential and commercial consumers to adopt solar energy has been the ability to significantly reduce—or ideally achieve a zero—electricity bill. Under the proposed gross metering framework, this core objective is no longer achievable. This fundamental change directly undermines the very incentive that has driven solar adoption across the country.

Furthermore, if this policy is implemented, consumers will be compelled to install larger solar systems in order to offset their electricity bills to a minimum level. This will substantially increase the initial investment required. In many cases, rooftop areas are already limited and cannot physically accommodate larger systems, making such installations impractical or altogether impossible.

As a result, the upfront cost of solar systems will increase significantly, and the return on investment—which currently averages around 1.5 years—will be extended considerably. A longer ROI period will inevitably discourage potential users, especially middle-income households, from opting for solar solutions.

Another major concern is the proposal that all net metering cases will now require approval from NEPRA. This will increase processing times, introduce additional bureaucratic layers, and raise the overall cost of net metering. Even under the current framework, many consumers find the net metering process financially and administratively challenging. Further delays and costs will only worsen the situation.

Public sentiment already reflects growing disappointment. Many potential consumers have expressed that if, after investing a substantial amount, they are still unable to significantly reduce their electricity bills, they would prefer not to invest in solar at all. This outcome is extremely concerning when viewed in light of Pakistan's stated commitment to environmental sustainability and its vision to "Go Green."

Suggestions for Consideration

1. The current unit-to-unit adjustment for off-peak units should be retained, as it has been a key factor in making net metering viable and attractive.
2. The proposed rate for peak units, currently around PKR 13–14, is too low to provide meaningful relief to consumers. This rate should be revised upward to at least PKR 20.
3. Gross metering should not be implemented. Instead, the Government should prioritize renegotiating existing agreements with Independent Power Producers (IPPs).
4. NEPRA approval requirements should remain limited to systems above 25kW, as is currently the case, to ensure a smooth net metering process.

I sincerely hope NEPRA will reconsider the proposed policy changes in the broader national interest, keeping in view environmental goals, consumer confidence, and the long-term sustainability of Pakistan's renewable energy sector.

Yours sincerely,

Engr. M. Ali Khan
Team Lead Solar Sales
Islamabad, Pakistan

Registrar

REGISTRAR OFFICE
Diary No. 946
Date: 15.1.26

CHAIRMAN
By No. 377
Date: 13-1-26

Processing/Attachment
Diary No. 411
Date: 16-1-26

To

The Chairman

National Electric Power Regulatory Authority (NEPRA)

Forwarded please:

☒ For action

☐ For information

☒ DG (Elec.)

☐ DG (Assembly)

☒ SA (M&E)

☐ DG (CAD)

☒ DG (Tech.)

☐ DG (ATC)

☐ ADG (Tr.)

☐ DG (Elec.)

☒ SLA

☐ Dir. (I.T.)

☐ Consult (Tech.)

☐ Consult (EUCM)

For kind information, please.

1. Chairman 2. M (Tech.)

3. M (Law) 4. M (Dev.)

Subject: Concerns and Suggestions Regarding the Proposed Net Metering Policy

Respected Sir,

I am an ordinary citizen who is deeply troubled by the proposed changes to the net metering system. For many households, installing solar panels required a massive financial sacrifice, made only because it promised freedom from unaffordable electricity bills. When that promise is put at risk, the entire purpose of such an investment comes into question.

Choosing solar was not an easy or casual decision. Families committed their savings believing the rules would remain reliable. Abrupt policy shifts now make people feel exposed and uncertain, as if their trust has been overlooked. Rather than being rewarded for adopting clean energy, the public feels burdened by new complications.

With everyday costs already rising, limiting the benefits of solar energy will place even more strain on common households. It may also discourage future investment in renewable energy and slow down progress toward energy independence. This situation has created frustration across the country, as people feel their long-term planning is being ignored.

Suggestions:

Existing net-metering consumers should be protected under a grandfathering policy so their investments remain secure.

Any new policy should be implemented gradually, not abruptly, to avoid financial shock to the public.

Buy-back rates should be fair and reasonable to maintain public trust.

The government should consult stakeholders and the public before finalizing such major decisions.

Renewable energy policies should aim to support citizens, reduce bills, and promote long-term sustainability, not create fear and uncertainty.

Your Sincerely,

Burhan Khan

Islamabad, Pakistan

Registrar

REGISTRAR OFFICE
Diary No: 947
Date: 15-1-26

CHAIRMAN
Dy No: 378
Date: 13-1-26

NEPRA
Licensing Department
Diary No: 410
Date: 16-1-26

To

The Chairman

National Electric Power Regulatory Authority (NEPRA)

Subject: Concerns and Suggestions Regarding the Proposed Net Metering Policy

Respected Sir,

I speak as a regular citizen, I speak as a regular citizen who is deeply troubled by the proposed changes to the net metering system. For many households, installing solar panels required a massive financial sacrifice, made only because it promised freedom from unaffordable electricity bills. When that promise is put at risk, the entire purpose of such an investment comes into question.

Choosing solar was not an easy or casual decision. Families committed their savings believing the rules would remain reliable. Abrupt policy shifts now make people feel exposed and uncertain, as if their trust has been overlooked. Rather than being rewarded for adopting clean energy, the public feels burdened by new complications.

With everyday costs already rising, limiting the benefits of solar energy will place even more strain on common households. This has led to widespread dissatisfaction, and many Pakistanis feel anxious and unheard as discussions around this policy continue.

What citizens hope to see:

Protection for those who installed solar under existing net metering arrangements.

Clear, stable, and predictable energy policies with no sudden reversals.

Fair valuation of electricity supplied to the grid by consumers.

Genuine dialogue between authorities and the public before final decisions are made.

Policies that promote renewable energy adoption instead of discouraging it.

Your Sincerely,

Muhammad Saqib

Islamabad, Pakistan

Registrar

Forwarded please:	
<input checked="" type="checkbox"/> For decision	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Ac.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (TH)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECONOM)

For kind information, please:
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 848
Date: 15/1/26

CHAIRMAN
DY No: 376
Date: 13-1-26

NEPRA
Licensing Department
Diary No: 409
Date: 16-1-26

Subject: Feedback on Proposed Changes to Net Metering Policy

Respected Chairman NEPRA,

Hope you are doing well.

I am writing to share my concerns regarding the proposed shift from the existing net metering system to a net or gross billing framework. While reforms in the power sector are important, these changes may severely impact residential consumers who are already burdened by high electricity costs and inflation.

Under the current net metering policy, households can offset their electricity usage by exporting surplus solar energy at retail rates, making rooftop solar financially viable. The proposed policy would require consumers to buy electricity at high tariffs while receiving much lower compensation for exported units. This imbalance would significantly reduce savings, extend payback periods, and discourage many families from adopting solar energy.

Solar has provided hope for energy independence amid load shedding and rising tariffs. Discouraging new solar installations could slow the growth of renewable energy, hurt local solar businesses, and move Pakistan away from global green energy initiatives aimed at reducing carbon emissions and environmental impact.

I respectfully urge NEPRA to reconsider these changes and adopt a balanced approach that protects residential consumers while continuing to encourage clean and sustainable energy adoption.

Thank you for your consideration.

Sincerely,
Shakeel Ahmed
Rawalpindi

REGISTRAR OFFICE
Diary No. 949
Date: 15.1.28

CHAIRMAN
By No. 375
Date: 13-1-26

Forwarded Please:

<input checked="" type="checkbox"/> For m.c. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input checked="" type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input checked="" type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Legal)

For kind information, please:

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

To
The Chairman
National Electric Power Regulatory Authority (NEPRA)
Islamabad, Pakistan

Subject: Concern Regarding New Net Metering Policy and Its Negative Impact on Consumers and Solar Market

Respected Sir,

I am writing to share my concern about the new net metering policy. These changes have created financial problems for solar users and have badly affected the solar market as well in our country.

Many people installed solar systems under the old policy, expecting fair payment for the extra electricity they send to the grid. The new buyback rates have reduced these benefits, making it hard for people to recover their investment. This is especially difficult for families and farmers who invested their savings or took loans to install solar.

Due to this policy, solar companies and installers are also suffering because fewer people are now willing to buy solar systems. This may cause job losses and slow down the growth of clean energy in Pakistan.

I request NEPRA to kindly review this policy and make it fair for consumers and the solar industry. A stable and supportive net metering policy is very important for Pakistan energy future.

Thank you for your time and consideration.

Yours sincerely,

Hizbullah Khan
Lahore, Pakistan

Registrar

[Signature]

Forwarded please:

☒ For per action ☐ For information

<input checked="" type="checkbox"/> DG (Ac.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (TH)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> DG (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECOM)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No. 928
Date: 15.1.26

CHAIRMAN
Dy No. 374
Date: 13-1-26

[Signature]
15-01-26

RECEIVED
LICENSING DEPARTMENT
Diary No. 407
Date: 16-1-26

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Tuesday, 20 January, 2026 9:07 AM
To: Shahid Farooque
Subject: Fwd: Comments on NEPRA Draft Prosumer Regulations 2025

----- Original Message -----

Subject: Fwd: Comments on NEPRA Draft Prosumer Regulations 2025
Date: 2026-01-19 15:29
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: FW: Comments on NEPRA Draft Prosumer Regulations 2025
Date: 2026-01-19 12:03
From: "Registrar" <registrar@nepra.org.pk>
To: <cad@nepra.org.pk>

From: Furqan Saleem <furqan08@yahoo.com>
Sent: Monday, January 19, 2026 5:44 AM
To: chairman@nepra.org.pk; info@nepra.org.pk; maqsood.anwar@nepra.org.pk; registrar@nepra.org.pk; cad@nepra.org.pk
Subject: Comments on NEPRA Draft Prosumer Regulations 2025

I appreciate NEPRA's efforts to update the prosumer regulations. As a residential solar user, I respectfully offer the following comments and suggestions for a balanced approach that safeguards the grid's sustainability while preserving incentives for rooftop solar:

* Net Billing vs. Incentives: The shift from net metering to net billing (fixed buyback at ~Rs11/unit) addresses DISCO revenue concerns, but it sharply reduces consumer savings. I urge a phased implementation of net billing – for example, gradually lower the export rate over 2–3 years – to avoid a sudden shock. This phased approach would protect grid finances and give consumers time to adjust their investment expectations.

* Buyback Rate Reduction: Cutting the solar buyback rate by ~60% will lengthen payback periods well beyond 7–8 years. To maintain public confidence, grandfather pending applications submitted before the new rules. Those who invested under the 2015 regime in good faith should receive the originally expected rate (or a moderately reduced rate) for a transition period. This fair treatment will uphold investor trust and prevent legal/administrative disputes.

* Licensing Requirement for <25 kW: Requiring a generation licence for small systems adds complexity and cost for ordinary homeowners. I suggest streamlining or exempting micro-scale installations (e.g. ≤10 kW) from full licensing. Perhaps implement a simplified online registration instead of a formal licence for small prosumers. This would lighten NEPRA's administrative load and not discourage middle-class families from going solar.

* Cap on System Size to Sanctioned Load: Capping PV size at 100% of sanctioned load (down from 150%) may limit consumers who planned modest oversizing to cover future load growth or efficiency losses. I agree there should be

a cap to protect feeders, but consider allowing a slight buffer (e.g. 120% of load) if paired with battery storage. This way, consumers who invest in batteries (which reduce export spikes) get flexibility to right-size their systems without straining the grid.

* Contract Duration (5 Years): A five-year net-billing agreement creates uncertainty. Most residential solar loans or ROI expectations are 5–7 years. A longer guaranteed term (10+ years) or at least a clear renewal framework would better align with investment horizons. If five years is fixed, please clarify that after five years prosumers can continue under the prevailing rates rather than being cut off. A stable long-term policy is crucial for consumer confidence.

* Encouraging Storage & Peak Shifting: I appreciate that the draft acknowledges prosumers can aid the grid. To further align interests, NEPRA could introduce battery storage incentives. For example, a small tariff rebate or grant for installing certified storage, or time-of-use import rates that reward using batteries to reduce peak grid draw. This would encourage prosumers to invest in batteries, which in turn improves grid stability (by curtailing daytime exports and evening peaks). It's a win-win: the grid sees smoother demand, and consumers get more value from self-consumption under net billing.

* Grid Sustainability & Consumer Rights: I fully support a sustainable grid and understand the need to address cross-subsidies. At the same time, the policy should recognize that rooftop solar provides public benefits: reduced load shedding, lowered fuel imports, and progress toward climate goals. The final regulations should strive to "balance interests" as NEPRA's mandate requires, by not swinging so far that small prosumers lose all incentive to participate. I respectfully suggest NEPRA include a brief review period (e.g. 2 years) for these new rules to monitor their impact on solar adoption and grid health. If adoption crashes or grid issues persist, adjustments could be made in consultation with stakeholders.

In conclusion, I commend NEPRA's intent to modernize the framework and protect non-solar consumers. My recommendations seek to ensure the regulations do not inadvertently discourage rooftop solar growth — which is key to a clean, affordable, and self-sufficient energy future for Pakistan. By phasing changes, honoring existing investments, easing licensing burdens, and introducing pro-storage measures, NEPRA can achieve its aims while keeping the public on board with the solar transition.

Thank you for considering these comments. I trust NEPRA will refine the draft rules to strike a prudent balance between utility sustainability and consumer empowerment. I am hopeful that with slight adjustments, the Prosumer Regulations 2025 will both strengthen our grid and continue to encourage rooftop solar adoption, to the benefit of all stakeholders.

Best regards,

Furqan Ahmad Saleem

Chartered Accountant

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 19 January, 2026 10:08 AM
To: Shahid Farooque
Subject: Fwd: Comments on NEPRA Draft Prosumer Regulations 2025

----- Original Message -----

Subject: Fwd: Comments on NEPRA Draft Prosumer Regulations 2025
Date: 2026-01-19 09:14
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Comments on NEPRA Draft Prosumer Regulations 2025
Date: 2026-01-19 05:43
From: Furqan Saleem <furqan08@yahoo.com>
To: "chairman@nepra.org.pk" <chairman@nepra.org.pk>, "info@nepra.org.pk" <info@nepra.org.pk>, "maqsood.anwar@nepra.org.pk" <maqsood.anwar@nepra.org.pk>, "registrar@nepra.org.pk" <registrar@nepra.org.pk>, "cad@nepra.org.pk" <cad@nepra.org.pk>

I appreciate NEPRA's efforts to update the prosumer regulations. As a residential solar user, I respectfully offer the following comments and suggestions for a balanced approach that safeguards the grid's sustainability while preserving incentives for rooftop solar:

*

Net Billing vs. Incentives: The shift from net metering to net billing (fixed buyback at ~Rs11/unit) addresses DISCO revenue concerns, but it sharply reduces consumer savings. I urge a phased implementation of net billing – for example, gradually lower the export rate over 2–3 years – to avoid a sudden shock. This phased approach would protect grid finances and give consumers time to adjust their investment expectations.

*

Buyback Rate Reduction: Cutting the solar buyback rate by ~60% will lengthen payback periods well beyond 7–8 years. To maintain public confidence, grandfather pending applications submitted before the new rules. Those who invested under the 2015 regime in good faith should receive the originally expected rate (or a moderately reduced rate) for a transition period. This fair treatment will uphold investor trust and prevent legal/administrative disputes.

*

Licensing Requirement for <25 kW: Requiring a generation licence for small systems adds complexity and cost for ordinary homeowners. I suggest streamlining or exempting micro-scale installations (e.g. ≤10 kW) from full licensing. Perhaps implement a simplified online registration instead of a formal licence for small prosumers. This would lighten NEPRA's administrative load and not discourage middle-class families from going solar.

*

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*

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*

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*

Grid Sustainability & Consumer Rights: I fully support a sustainable grid and understand the need to address cross-subsidies. At the same time, the policy should recognize that rooftop solar provides public benefits: reduced load shedding, lowered fuel imports, and progress toward climate goals. The final regulations should strive to "balance interests" as NEPRA's mandate requires, by not swinging so far that small prosumers lose all incentive to participate. I respectfully suggest NEPRA include a brief review period (e.g. 2 years) for these new rules to monitor their impact on solar adoption and grid health. If adoption crashes or grid issues persist, adjustments could be made in consultation with stakeholders.

In conclusion, I commend NEPRA's intent to modernize the framework and protect non-solar consumers. My recommendations seek to ensure the regulations do not inadvertently discourage rooftop solar growth — which is key to a clean, affordable, and self-sufficient energy future for Pakistan. By phasing changes, honoring existing investments, easing licensing burdens, and introducing pro-storage measures, NEPRA can achieve its aims while keeping the public on board with the solar transition.

Thank you for considering these comments. I trust NEPRA will refine the draft rules to strike a prudent balance between utility sustainability and consumer empowerment. I am hopeful that with slight adjustments, the Prosumer Regulations 2025 will both strengthen our grid and continue to encourage rooftop solar adoption, to the benefit of all stakeholders.

Best regards,
Furqan Ahmad Saleem
Chartered Accountant

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Friday, 16 January, 2026 9:26 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Comments on the NEPRA (Prosumer) Regulations

From: Nadeem Afzal Chan <nadeemafzalchan2026@gmail.com>
Sent: Thursday, January 15, 2026 3:14 PM
To: registrar@nepra.org.pk
Cc: nadeemafzalchan@yahoo.com
Subject: Comments on the NEPRA (Prosumer) Regulations

1. Change in Buy Back Rates and Methodology

i. The NEPRA (Prosumer) Regulations (“Prosumer Regulations”) attempt to introduce the concept of net-billing under Regulation 14. However, this is in stark contrast to the methodology of billing under the Net Metering Regulations, specifically under sub-regulation (6) of Regulation 14, which is as follows:

“14 (6) The Authority may determine the tariff payable by the Distribution Company to the Distributed Generator from time to time; provided, however, the tariff once awarded to a Distributed Generator shall remain valid for a term of the Agreement/License.”

ii. In view of the aforementioned provision, the buyback rates for existing Distributed Generators (“DGs”), while their contracts are still in their pendency, cannot be modified or reduced, in light of the specific safeguards provided under Regulation 14 (6) of the Net Metering Regulations.

iii. Additionally, the DG Interconnection Agreement (“Agreement”) appended as Schedule I to the Net Metering Regulations, through Recital C, incorporates the Standard DG Application Form (Schedule II of the Net Metering Regulations) into the Agreement. The said Application Form provides two options for the applicant to select under Serial 5, which are Onsite Use of Power and Net Energy Billing. In case of selection of Net Energy Billing, the same is considered to be incorporated into the Agreement.

iv. Net Energy Billing and Net Energy are defined under sub-regulations (s) and (t) Regulation 2 of the Net Metering Regulations respectively, as follows:

“Net Energy Billing means a billing and metering practice under which a Distributed Generator is billed on the basis of net energy over the billing cycle;”

“Net Energy means a balance (positive or negative) of the kWh generated by Distributed Generator against the kWh supplied by Distribution Company at the end of Billing Cycle;”

v. In light of the above, the methodology of Net Energy Billing, as contained in the Net Metering Regulations, cannot be modified by the Prosumer Regulations, for existing DGs, as the same stands protected in their contracts.

2. Change in Sanctioned Load

- i. Regulation 3 (2) of the Prosumer Regulations changes the maximum capacity of the DG facility to the sanctioned load of the applicant's premises, whereas, previously it was 1.5 times that of the sanctioned load.
- ii. This change is entirely unjustified and uncalled for, and does not take into account the existing DGs which have already installed facilities exceeding their sanctioned load. Therefore, this proposed reduction in the maximum capacity of DG facility should be removed.

3. Lack of Digitization / No Process Improvement

- i. The Prosumer Regulations entirely fail to introduce new processes that would expedite the application processing time by the DISCOs, and do not create any obligations on part of the DISCOs to create a digital (online) system to receive applications.
- ii. DISCOs often delay processing of applications, at the cost of the applicants, and the Prosumer Regulations should provide a definitive way to solve this.

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Friday, 16 January, 2026 4:00 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Voice against change in Net Metering Regulations

-----Original Message-----

From: Muhammad Zikria <zikria12@gmail.com>
Sent: Friday, January 16, 2026 2:59 PM
To: registrar@nepra.org.pk
Subject: Voice against change in Net Metering Regulations

Dear Sir,

With reference to draft notice issued by NEPRA on January 2026 in major daily newspapers and placed on its website seeking comments on a suggested change in the National Electric Power Regulatory Authority (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015, please find my comments on the same below:

I am an existing net metering enabled consumer of one of the licensed DISCO with clear and up to date accounts up to the current month. I opted for the net-metering investment as a power consumer to be able to swap units generated by my alternative energy investment with the units of the DISCO instead of storing it in batteries. The units generated by my alternative set up should be treated at par with the units I consume from my DISCO.

Any difference between national average energy purchase pricing and national average power purchase price is going to negatively affect the calculations of my small investment in the green future of Pakistan.

I strongly oppose the changes mentioned in the announcement to be done in the text appearing in sub-regulation 5 of regulation 14 of the regulations and demand that this be left unchanged. When we opted for net-metering under the licensing regulations of NEPRA, there was no understanding of 'energy generation' and we were all very clear that we are talking about 'power generation'. As such, units produced by our alternative set up should be treated at par with the units supplied by the DISCO and FCA as well as GST be charged on Net Units only. As consumers, we are not in the business of energy production and selling, rather we produce electric power units that the DISCO sells at their own rates and we are merely storing our units with the DISCO for later consumption during the other half of the day.

Sent with highest level of disappointment for NEPRA's backward move to discourage Solar installation.

Thanks for your attention.

Sincerely,

Lt Col Muhammad Zikria
Contact: 0321-5017628
CNIC: 17301-1375167-9
Reference No. 13-14615-2797301

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 2:13 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Net metering

From: Muhammad Hurairah <mhurairahjamil@gmail.com>
Sent: Wednesday, January 14, 2026 1:33 PM
To: registrar@nepra.org.pk
Subject: Net metering

In this formal objection to the draft Prosumer Regulations 2025, I urge NEPRA to maintain the original 2015 Net Metering unit-to-unit adjustment mechanism, as shifting to a low-rate Net Billing model destroys the financial viability for middle-class households and undermines consumer trust. While I accept technical safeguards like limiting solar capacity to 100% of sanctioned load and restricting connections on overloaded transformers, the primary focus should be on renegotiating unsustainable IPP capacity payments and reducing the national fuel import bill rather than penalizing green energy producers. Discouraging solar adoption at this stage will not only drain foreign exchange reserves through increased fossil fuel reliance but also derail Pakistan's Electric Vehicle (EV) policy and climate goals; therefore, I recommend that the Authority prioritize long-term energy security and environmental health by preserving incentives for decentralized renewable energy.

Abu Hurairah
SA garden
Lahore
03234570798

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 2:14 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Response to Net metering newspaper cutting

From: Ayesha Butt <ayeshasolarpakistan@gmail.com>
Sent: Wednesday, January 14, 2026 1:44 PM
To: registrar@nepra.org.pk
Subject: Response to Net metering newspaper cutting

In this formal objection to the draft Prosumer Regulations 2025, I urge NEPRA to maintain the original 2015 Net Metering unit-to-unit adjustment mechanism, as shifting to a low-rate Net Billing model destroys the financial viability for middle-class households and undermines consumer trust. While I accept technical safeguards like limiting solar capacity to 100% of sanctioned load and restricting connections on overloaded transformers, the primary focus should be on renegotiating unsustainable IPP capacity payments and reducing the national fuel import bill rather than penalizing green energy producers. Discouraging solar adoption at this stage will not only drain foreign exchange reserves through increased fossil fuel reliance but also derail Pakistan's Electric Vehicle (EV) policy and climate goals; therefore, I recommend that the Authority prioritize long-term energy security and environmental health by preserving incentives for decentralized renewable energy.

Ayesha Butt
Amir road, Lahore
03274808020

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Thursday, 15 January, 2026 11:28 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Formal Objection to Draft NEPRA Prosumer Regulations 2025 and Request for Reconsideration

From: dilawar.hussain@dsgroupco.com <dilawar.hussain@dsgroupco.com>
Sent: Wednesday, January 14, 2026 6:56 PM
To: Registrar@nepra.org.pk
Subject: Formal Objection to Draft NEPRA Prosumer Regulations 2025 and Request for Reconsideration

Dear Sir,

With reference to your publication in the newspaper dated 15 December 2025 regarding the Draft NEPRA Prosumer Regulations, 2025, I am writing as a concerned citizen and an existing net-metering consumer to formally submit my reservations. While I acknowledge and appreciate the Authority's efforts to strengthen grid stability and manage the growing penetration of distributed generation, certain provisions in the proposed regulations may unintentionally discourage renewable energy adoption in Pakistan.

1. Objection to the Proposed Change in Net Metering Mechanism

The transition from the existing net-metering model (unit-to-unit adjustment) to a net billing or gross metering framework represents a significant setback for solar consumers. Reducing the export buyback rate to the National Average Energy Purchase Price (approximately PKR 13/unit), while import energy continues to be charged at retail tariffs (approximately PKR 50–60/unit), severely undermines the financial feasibility of solar investments for middle-income households.

The 2015 regulations provided a fair and transparent incentive structure, enabling citizens to invest their own capital to support the national energy system. I respectfully request that the Authority reconsider this change and retain the original net-metering mechanism to preserve consumer confidence and sustain momentum toward clean energy adoption.

2. Acceptance of Technical Safeguards

I recognize that rapid growth in distributed solar generation presents operational and infrastructure challenges for the distribution network. In this context, the following proposed measures appear reasonable and technically justified:

- **Sanctioned Load Limitation:** Restricting installed solar capacity to 100% of the sanctioned load is a prudent step to ensure exports remain within authorized limits.
- **Transformer Capacity Threshold:** Limiting new connections once transformer loading reaches 80% is a practical safeguard to prevent localized overloading and equipment damage.

3. Need for Re-evaluation of IPP Agreements and Capacity Payments

Beyond net-metering considerations, the root cause of escalating electricity tariffs lies in unsustainable Independent Power Producer (IPP) agreements. Long-standing "take-or-pay" contracts, dollar-indexed returns, and capacity payments for unused generation continue to burden the national economy and inflate consumer tariffs. A strategic transition

• toward more balanced and transparent contractual frameworks is essential to restore affordability and competitiveness within the power sector.

4. Contribution of Prosumers to Reducing Fuel Imports

Net-metering consumers are not a burden on the grid; rather, they contribute directly to reducing the national fuel import bill. In FY 2024–25, net-metered capacity exceeded 5,800 MW, displacing expensive thermal generation during peak daylight hours. This has helped conserve foreign exchange and stabilize fuel cost adjustments for all consumers. Discouraging net-metering at this stage risks reversing these gains and increasing reliance on imported fossil fuels.

5. Environmental Sustainability and Electric Vehicle Adoption

Pakistan remains highly vulnerable to climate change, with worsening air quality in major cities. Making solar investments financially unattractive will slow the transition away from fossil fuels and undermine national environmental objectives. Moreover, the success of the Government's Electric Vehicle policy depends on the availability of affordable and clean electricity. A weakened net-metering framework will reduce the incentive for EV adoption and compromise long-term sustainability goals.

6. Recommendations

In light of the above, I respectfully recommend that NEPRA:

- ✓ • Retain the unit-to-unit net-metering mechanism as per the 2015 policy.
- ✓ • Enforce sanctioned load and transformer capacity limits to address grid stability. *Supported.*
- Reassess costly IPP agreements to reduce long-term tariff pressure.
- Continue encouraging solar adoption to reduce the national import bill.
- Facilitate renewable energy growth as a strategic response to environmental and economic challenges.

The proposed 2025 regulations, in their current form, may hinder progress toward renewable energy targets and increase financial pressure on consumers. I trust that the Authority will carefully consider these observations during the public consultation process.

Regards,

Dilawar Hussain

Cell: +92 301 1440094

CNIC: 35402-8445176-9

Email: dilawar.hussain@dsgroupco.com

Address: 20 Tariq Block, Garden Town, Lahore – Pakistan

Shaïd UR Rehman

From: Muhammad Adeel Ashraf <adeelsindhu114@gmail.com>
Sent: Monday, 12 January, 2026 4:57 AM
To: IHUSSAIN@nepra.org.pk; Registrar@nepra.org.pk; sapm@moip.gov.pk; pro@moip.gov.pk; secretary@moip.gov.pk; invest@sifc.gov.pk
Cc: headoffice@reap.com.pk; info@reap.com.pk; info@pakistansolarassociation.org; info@reap.pk; Srfarooque@nepra.org.pk; info@neeca.gov.pk
Subject: Formal Objection to Proposed Net Billing Policy & Request for Strategic Reconsideration with public hearing
Attachments: Objecting the NetMetering policy with This visionary approach.pdf; Vision 2040_Pakistan's Energy Revolution.pdf; Final VISION 2040 From Energy Bankruptcy to Industrial Dominance.pdf

Dear Mr. Imtiaz Baloch, Registrar-NEPRA & Other Relevant Officials,

I hope this message finds you well.

I am writing to formally record my objection to the proposed changes in the Net Billing framework and to respectfully request NEPRA's reconsideration of the policy direction currently under discussion.

This objection is not made in defence of any single stakeholder group, but in the broader national interest of grid stability, industrial competitiveness, and long-term energy solvency.

Core Concern

Pakistan does not face an energy generation shortage. It faces a **storage, optimisation, and governance shortfall**. The proposed Net Billing revisions attempt to solve a structural problem by penalising distributed solar generation, which risks accelerating outcomes that are counter-productive for the grid and the economy.

Lowering buy back rates and tightening Net Billing will not preserve the grid. Instead, it will:

- Accelerate **grid defection**, particularly among high-consumption and financially capable users
- Push households and SMEs toward **private battery imports**, creating significant foreign exchange leakage
- Reduce daytime demand further, **increasing per-unit capacity costs** on remaining consumers
- Increase safety risks through millions of unmonitored, poorly maintained home battery systems

In effect, the policy risks repeating past mistakes where defensive regulation delays—but does not prevent—systemic stress.

Strategic Observation

Solar generation in Pakistan has already been financed by private capital. The grid's challenge is not solar penetration, but its inability to **harvest, store, and optimise low-cost daytime energy**.

Energy production is comparatively easy.

Energy storage and dispatch are the real constraints.

Attempting to “fight the sun” through restrictive Net Billing will only lead to higher tariffs, deeper circular debt pressure, and industrial contraction. Capturing the sun—through proper system-level storage and demand growth—offers the opposite outcome.

Recommended Policy Pivot (Summary)

I respectfully urge NEPRA, in coordination with the Ministry of Energy and SIFC, to consider the following immediate steps:

1. Pause aggressive Net Billing roll-out and tariff suppression mechanisms
2. Initiate a **utility-scale BESS pilot (5 GWh)** at key grid nodes
3. Encourage DISCOs to evolve into **energy optimisation and solar maintenance entities**
4. Fast-track digital solar onboarding and real-time visibility rather than restriction
5. Align power policy with industrial, trade, and export competitiveness objectives

This approach allows:

- Dilution of legacy capacity payments through **demand growth**, not consumer penalties
- Reduction in FX outflows by avoiding mass home-battery imports
- Restoration of industrial power tariffs to competitive regional levels
- Improved grid stability without litigation or abrupt contractual disruption

Industry Alignment

It is important to note that concerns similar to those outlined above are being raised across the ecosystem, including by large technology and storage players such as **Nigbo Green**, as well as by members within Pakistan’s renewable energy community. There is broad agreement that the current trajectory risks undermining both investor confidence and grid integrity.

Closing

This communication is made in the spirit of constructive engagement. NEPRA has historically played a pivotal role in balancing consumer protection with system sustainability. I firmly believe that with timely recalibration, Pakistan can transition from an energy-constrained economy to a low-cost, solar-powered industrial hub.

I would welcome the opportunity to present this perspective in a formal consultation or technical session, should NEPRA deem it useful.

Thank you for your time and consideration.

Yours sincerely,--

Muhammad Adeel Ashraf

Founder | Director | CEO | Entrepreneur | Analyst
Smart Pakistan / Sync Solar / Saint Solis Motors / Compare-EV / British Pathway

<https://adeelashraf.com> | UK+44 742 960 3889 | PK+92 345 770 6422

BA, Enterprise Management | University of Birmingham, UK.

MSC, Strategic Marketing & Consulting | University of Birmingham, UK.

MBA, Global Risk Management | LondonMet, UK.

Chartered Manager | CMI - Pearson Level 7 Strategic Management and Leadership, UK.

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Thursday, 15 January, 2026 1:06 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

Importance: High

From: Labeeb Ur Rehman <rehmans928@hotmail.com>
Sent: Thursday, January 15, 2026 12:42 PM
To: Registrar@nepra.org.pk; Chairman@nepra.org.pk; cad@nepra.org.pk
Subject: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment
Importance: High

Wasim Anwar Bhinder

Registrar Nepra

Nepra Tower, Attaturk Avenue (East) G-5/1, Islamabad.

Subject: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

Dear Sir,

Reference to your publication regarding Prosumers Regulation 2025 in the newspaper dated 15th December 2025, I am writing as a concerned citizen and existing solar Net metering consumer to formally record my reservations regarding the recently proposed "NEPRA Prosumer Regulations, 2025." While I appreciate the Authority's efforts to ensure grid stability and manage the growing distributed generation capacity, however certain clauses in the draft are highly discouraging for renewable energy adoption in Pakistan.

1. Objection to the Change in Net Metering Mechanism

The shift from the existing Net Metering (unit-to-unit adjustment) to a Net Billing/Gross Metering model is a significant setback. By slashing the buyback rate to the National Average Energy Purchase Price (approx. Rs. 13/unit) while charging retail rates for imports (approx. Rs. 50-60/unit), the financial viability of solar investments for middle-class households is effectively destroyed.

The 2015 Regulations provided a fair incentive for citizens to invest their own capital to bridge the national energy gap. I request the Authority to revert to the original Net Metering mechanism to maintain consumer trust and continue the momentum of Green Energy.

2. Acceptance of Technical Constraints

I recognize that the rapid growth of solar generation poses technical challenges to the aging distribution infrastructure. In this regard, I find the following proposed changes to be reasonable and acceptable:

- **Sanctioned Load Clause:** Limiting the solar system capacity to 100% of the Sanctioned Load (instead of 150%) is a fair measure to ensure that the household's export does not exceed its authorized grid connection capacity.
- **Transformer Capacity Clause:** Restricting new connections once a transformer reaches 80% of its capacity is a logical technical safeguard to prevent local grid failures and protect equipment.

3. Re-evaluation of IPP Agreements and Capacity Payments

Beyond the technicalities of net metering, the primary driver behind the current energy crisis is the existence of unfair and unsustainable agreements with Independent Power Producers (IPPs). For decades, the national economy has been bled dry by "Take-or-Pay" clauses, where the government is forced to pay billions in "capacity charges" for electricity that is never actually produced or consumed. These dollar-indexed returns and sovereign guarantees have created an artificial tariff hike that is killing industrial productivity and pushing the common man below the poverty line. It is high time the government takes decisive steps to renegotiate or terminate these lopsided contracts, transitioning instead to a "Take-and-Pay" model. We cannot expect the public to subsidize the inefficiencies of the power sector and the excessive profits of a few influential groups while the rest of the country's economy remains in a state of paralysis.

4. Contribution to Reducing the National Fuel Import Bill

It is critical to acknowledge that Net-Metering consumers are not a burden, but a major contributor to the national exchequer. In FY 2024-25 alone, net-metered solar capacity in Pakistan crossed 5,800 MW, significantly reducing the need for expensive thermal power generation. By generating clean energy during peak daylight hours, consumers directly displace electricity that would otherwise be produced using imported FO (Furnace Oil) and RLNG (Regasified Liquefied Natural Gas). Recent data indicates that this decentralized generation has helped the country save billions in foreign exchange and even contributed to negative Fuel Charge Adjustments (FCA), providing relief to all grid consumers. Discouraging net metering now would essentially force the country back toward a heavy reliance on imported fossil fuels, further draining our precious foreign exchange reserves and worsening the trade deficit.

5. Environmental Survival and the Transition to Electric Vehicles (EVs)

Finally, it must be noted that Pakistan is already among the countries most vulnerable to climate change, with cities like Lahore and Multan suffering from hazardous smog levels every winter. Slowing down solar deployment by making it financially unviable will force a continued reliance on coal and oil-based power plants, which are primary contributors to particulate matter and poor air quality. Furthermore, the Government's own Electric Vehicle (EV) Policy depends entirely on the availability of economical and clean electricity. If net-metering benefits are withdrawn, the incentive for citizens to switch to EVs will vanish, as charging vehicles from an expensive and "dirty" national grid offers no relief. To achieve a "Clean Green Pakistan" and a smog-free future, the Authority must encourage solar energy as the backbone for an affordable EV charging infrastructure.

6. Recommendations

Instead of penalizing prosumers through reduced buyback rates, I urge NEPRA to:

- Maintain the unit-to-unit adjustment (Net Metering) as per the 2015 policy.
- Enforce strict compliance with Sanctioned Load and Transformer Loading limits to address grid stability.
- Re-evaluate expensive IPP Agreements
- Encourage Solar energy so that we can further reduce our import bill
- Wisely facilitate solar energy consumers to cater to escalating environmental challenges, ensuring that clean energy remains the primary tool for national growth rather than a casualty of regulatory shifts.

The proposed 2025 regulations, in their current form, will stall Pakistan's progress toward its renewable energy targets and increase the burden on already struggling consumers. I hope the Authority will consider these points during the public consultation process.

Yours Sincerely,

Name Labeeb Ur Rehman

CNIC 42000 5011882 3

Mobile 0333 5170122

Address F-15/1 Islamabad.

Email rehmans928@hotmail.com

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Thursday, 15 January, 2026 1:06 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: New Net-Metering Policy

From: Sabir Engineering <sepnergy@gmail.com>
Sent: Thursday, January 15, 2026 12:41 PM
To: registrar@nepra.org.pk
Subject: New Net-Metering Policy

Respected concerns,

I am writing to formally submit recommendations regarding the recent amendments to the solar net-metering framework. While the 2026 shift toward a "Net Billing" model aims for grid stability, the current implementation risks stalling Pakistan's green energy transition by significantly extending the payback period for domestic consumers.

I urge the Authority to consider the following amendments to ensure solar remains a viable solution for the public:

Revision of Buyback Rates (Export Tariff)

The current reduction of the buyback rate to approximately **Rs. 10–12/unit** creates a massive disparity against the import tariff (Rs. 60+/unit). I propose a **Fair Value Tariff** tied to the **National Average Power Purchase Price (NAPP)**, ensuring the export rate remains at least **50-60% of the import rate** to maintain a 4 to 5 years ROI.

Introduction of Peak-Hour Credits

To support grid stability, I request an amendment allowing consumers to export energy during peak hours (via battery storage) at a **premium rate**. This would incentivize the adoption of Hybrid-BESS (Battery Energy Storage Systems) and reduce the burden on the national grid during high-demand periods.

Strict Compliance to reduce consumption at Peak-Time

To implement a strict compliance for markets and commercial areas to shut down their activities before peak time at maximum level to control the peak time consumption and in result reduce burden on the national grid and circular debts.

Accelerating solar adoption is the only sustainable way to reduce the circular debt and provide relief to the common citizen. I look forward to these points being considered in the upcoming public hearing or regulatory review.

Sincerely,

Muhammad Shoaib

SEPNERGY Solutions

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:54 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Public Comments on Draft NEPRA (Prosumer) Regulations, 2025 — Protect consumers, investment, and Pakistan's clean-energy future

From: Mujtaba Raza <mujtaba.raza@solarcitizen.pk>
Sent: Tuesday, January 13, 2026 10:42 PM
To: Registrar <registrar@nepra.org.pk>
Subject: Public Comments on Draft NEPRA (Prosumer) Regulations, 2025 — Protect consumers, investment, and Pakistan's clean-energy future

Dear Mr Wasim A Bhinder,

I'm writing to submit formal public comments on the Draft NEPRA (Prosumer) Regulations, 2025.

Let me state the obvious up front: Pakistan needs a grid that is stable, fair, and financially sustainable. But the way to achieve that is not by making rooftop solar economically unattractive and administratively uncertain. The draft, as currently framed, will slow adoption, shrink a fast-growing industry, damage investor confidence, and ultimately make the country more dependent on expensive thermal generation—exactly the opposite of what most consumers and the state need.

My core concerns are practical, not theoretical:

1. The draft narrows access and creates room for restrictive interpretation

The eligibility framing (and related definitions) risk excluding or discouraging ordinary residential consumers and smaller commercial users, or enabling inconsistent implementation by DISCOs. If the intention is not to restrict participation, it should be written in a way that cannot be used to do so.

2. Artificial sizing constraints will reduce consumer savings and slow electrification

Capping system size through rigid thresholds (and leaving room for revision without predictability) prevents consumers from planning rationally based on actual consumption and future needs (additional cooling load, electrification, EVs). This makes rooftop solar a weaker tool for bill relief.

3. "Hosting capacity" rules will become a dead-end without transparency and a grid-upgrade pathway

Any transformer-level limit becomes, in practice, a first-come-first-served gate. Without public visibility of available capacity, clear queue rules, and a time-bound upgrade/augmentation mechanism, consumers will face arbitrary rejections and delays. That uncertainty alone will kill uptake in many areas.

4. Moving fully to net billing at a low export benchmark will materially worsen economics

- When consumers buy at retail but sell surplus at a much lower benchmark, payback periods stretch—and adoption collapses for the mass market. Worse, any provision that allows the export credit rate to be revised during the agreement introduces policy risk that banks and investors simply won't price kindly. Consumers need clarity. Investors need bankability.

5. A short agreement term reduces confidence and financing

A short tenor (even if renewable) is effectively an uncertainty premium built into every project. Rooftop solar is a long-life asset; regulation should recognise that reality.

6. Added fees and process friction will hit the small user hardest

Layering additional fees and approvals increases the "soft costs" that already frustrate consumers. If policy is meant to protect the system, it should not punish smaller users who are doing the right thing.

Why this matters beyond "prosumers":

- Consumers (including non-solar consumers) ultimately benefit from reducing expensive peak procurement and fuel import exposure. Suppressing distributed generation does not fix DISCO inefficiencies or structural distortions—it only delays consumer-led investment and relief.
- The solar industry is not a niche anymore; it supports thousands of jobs, competition, and after-sales service capacity. A sudden demand shock will have real consequences.
- From an environmental and public health standpoint, slower solar growth means more thermal burn and more pollution.

What I urge NEPRA to do instead (balanced, implementable options):

1. Write eligibility clearly so participation is not indirectly restricted (especially for residential consumers).
2. Replace rigid sizing caps with a consumption-based approach, and define a predictable sanctioned-load enhancement process.
3. If transformer hosting limits exist, publish hosting capacity visibility, queue rules, and a time-bound upgrade pathway.
4. If net billing is adopted, make the export credit methodology transparent and bankable—preferably fixed for the agreement term, or governed by a published index with clear caps/floors (not discretionary mid-term revisions).
5. Create a "fast track" category for small systems (e.g., homes and small businesses) with simplified documentation and reduced friction, while keeping studies for larger systems where justified.
6. If cross-subsidy or cost-shift concerns are central, address them transparently (e.g., wires/DUoS charges) rather than weakening rooftop solar economics and discouraging adoption.

Pakistan's consumers are not the enemy. Private investment in clean energy is not the enemy. A well-designed prosumer framework can protect the grid and protect consumers at the same time—but only if it is predictable, transparent, and fair.

I request that these comments be placed on record and considered before finalisation. I would also welcome a stakeholder consultation where EPCs, consumer representatives, financiers, and DISCOs can work through amendments that are both technically sound and economically sensible.

Sincerely,

Mujtaba Raza

CEO, Solar Citizen (Modular Energy SMC-Pvt. Ltd.)

Karachi, Pakistan

mujtabaraza@gmail.com

(Company): 031-SOLAR-111 | connect@solarcitizen.com.pk

We look forward to helping you take the next steps towards a sustainable future.

Best regards,

Mujtaba Raza

INITIATE. EMPOWER. BECOME.



Suit 212-213, Sea Breeze Plaza, Shahrah-e-Faisal, Karachi, Pakistan

mujtaba.raza@solarcitizen.pk | www.solarcitizen.pk

Please consider the environment before printing.

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Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:55 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Urgent Complaint Regarding Unscheduled & Prolonged Power Outages – Account No. 0400002205082

From: salman ahmed <salmanahmed1745@gmail.com>
Sent: Tuesday, January 13, 2026 11:25 PM
To: customer.care@ke.com.pk
Cc: cad@nepra.org.pk; registrar@nepra.org.pk; speakup@ke.com.pk
Subject: Urgent Complaint Regarding Unscheduled & Prolonged Power Outages – Account No. 0400002205082

To
Customer Care Department
K-Electric

This is to formally lodge a serious complaint against the frequent, prolonged, and completely unscheduled power outages at my factory premises.

I am extremely disappointed to inform you that almost on a daily basis, electricity is cut off for 7 to 8 continuous hours, without any prior notice or scheduled load-shedding intimation. Whenever I contact your helpline, I am repeatedly given the same excuse that “tripping ho rahi hai” or that the fault is due to some other area or consumer.

However, I am the one who is suffering, both operationally and financially.

Due to these continuous outages:

My factory operations come to a complete halt

Production timelines are missed

Labour costs are wasted

Machinery and material are being affected

I am facing heavy financial losses on a daily basis

Despite all this, I am a regular bill payer, paying bills in lakhs every month without delay.

My details are as follows:

Account Number: **0400002205082**

Consumer Name: M/s Almas Brother

It is completely unacceptable that after paying such a high commercial tariff, I am subjected to unscheduled load-shedding with no accountability. I would like to make it very clear that I cannot bear further losses due to K-Electric's mismanagement.

I hereby demand:

Immediate investigation into this issue

Permanent and technical resolution to stop these outages

Written clarification as to why my factory is being affected repeatedly

Clear confirmation that no unscheduled power shutdowns will occur in future

If this issue is not resolved immediately, I will be left with no option but to escalate this matter to NEPRA and other relevant authorities, and consider legal action for recovery of losses.

Kindly treat this matter as URGENT & HIGH PRIORITY and respond without delay.

Regards,

Authorized Person

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 2:14 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Prosumer regulation,

From: Huzaifa Jamil <mhuzaifajamil@gmail.com>
Sent: Wednesday, January 14, 2026 1:41 PM
To: registrar@nepra.org.pk
Subject: Prosumer regulation,

Through this formal objection to the draft Prosumer Regulations 2025, I respectfully request that NEPRA retain the 2015 Net Metering unit-to-unit settlement mechanism. Transitioning to a low-tariff Net Billing framework would significantly weaken the economic viability of rooftop solar for middle-class consumers and erode confidence in regulatory consistency. While I recognize the importance of technical controls—such as limiting installed solar capacity to 100% of sanctioned load and restricting new connections on overloaded transformers—the fundamental issues lie elsewhere. Greater emphasis should be placed on revisiting unsustainable IPP capacity payment structures and lowering the country's fuel import burden, rather than penalizing households that have invested in clean energy solutions. At this critical stage, discouraging solar adoption would increase dependence on imported fossil fuels, place additional pressure on foreign exchange reserves, and hinder Pakistan's Electric Vehicle (EV) transition and climate commitments. I therefore urge the Authority to uphold long-term energy security and environmental sustainability by continuing to support and incentivize decentralized renewable energy generation.

Huzaifa Jamil
H# 12, ghias ud din street, millat road, near chohan road, Lahore

03274808010

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 2:14 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Net metering

From: Shakeela Zahid <shakeelazahid530@gmail.com>
Sent: Wednesday, January 14, 2026 1:25 PM
To: Registrar@nepra.org.pk
Subject: Net metering

In this formal objection to the draft **Prosumer Regulations 2025**, I urge NEPRA to maintain the original 2015 **Net Metering** unit-to-unit adjustment mechanism, as shifting to a low-rate Net Billing model destroys the financial viability for middle-class households and undermines consumer trust. While I accept technical safeguards like limiting solar capacity to **100% of sanctioned load** and restricting connections on overloaded transformers, the primary focus should be on renegotiating unsustainable **IPP capacity payments** and reducing the national fuel import bill rather than penalizing green energy producers. Discouraging solar adoption at this stage will not only drain foreign exchange reserves through increased fossil fuel reliance but also derail Pakistan's **Electric Vehicle (EV) policy** and climate goals;

therefore, I recommend that the Authority prioritize long-term energy security and environmental health by preserving incentives for decentralized renewable energy.

Shakeela zahid

H# 12, st 4/a millet road sanda khurd lahore.

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 2:13 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Net metering

From: Muhammad Hurairah <mhurairahjamil@gmail.com>
Sent: Wednesday, January 14, 2026 1:33 PM
To: registrar@nepra.org.pk
Subject: Net metering

In this formal objection to the draft Prosumer Regulations 2025, I urge NEPRA to maintain the original 2015 Net Metering unit-to-unit adjustment mechanism, as shifting to a low-rate Net Billing model destroys the financial viability for middle-class households and undermines consumer trust. While I accept technical safeguards like limiting solar capacity to 100% of sanctioned load and restricting connections on overloaded transformers, the primary focus should be on renegotiating unsustainable IPP capacity payments and reducing the national fuel import bill rather than penalizing green energy producers. Discouraging solar adoption at this stage will not only drain foreign exchange reserves through increased fossil fuel reliance but also derail Pakistan's Electric Vehicle (EV) policy and climate goals; therefore, I recommend that the Authority prioritize long-term energy security and environmental health by preserving incentives for decentralized renewable energy.

Abu Hurairah
SA garden
Lahore
03234570798

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 2:14 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Response to Net metering newspaper cutting

From: Ayesha Butt <ayeshasolarpakistan@gmail.com>
Sent: Wednesday, January 14, 2026 1:44 PM
To: registrar@nepra.org.pk
Subject: Response to Net metering newspaper cutting

In this formal objection to the draft Prosumer Regulations 2025, I urge NEPRA to maintain the original 2015 Net Metering unit-to-unit adjustment mechanism, as shifting to a low-rate Net Billing model destroys the financial viability for middle-class households and undermines consumer trust. While I accept technical safeguards like limiting solar capacity to 100% of sanctioned load and restricting connections on overloaded transformers, the primary focus should be on renegotiating unsustainable IPP capacity payments and reducing the national fuel import bill rather than penalizing green energy producers. Discouraging solar adoption at this stage will not only drain foreign exchange reserves through increased fossil fuel reliance but also derail Pakistan's Electric Vehicle (EV) policy and climate goals: therefore, I recommend that the Authority prioritize long-term energy security and environmental health by preserving incentives for decentralized renewable energy.

Ayesha Butt
Amir road, Lahore
03274808020

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 1:16 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Objections to the Proposed Changes in Distributed Generation Regulations (Reference no. 16115230805902U)

-----Original Message-----

From: info@urbansole.com.pk <info@urbansole.com.pk>
Sent: Wednesday, January 14, 2026 12:47 PM
To: Registrar <registrar@nepra.org.pk>
Cc: Jawad <jawad@urbansole.com.pk>
Subject: Objections to the Proposed Changes in Distributed Generation Regulations (Reference no. 16115230805902U)

Respected Registrar,
کم ی علی السلام،

We are writing to voice our serious reservations regarding the proposed overhaul of the net-metering framework. While the government encourages a transition to "Green Energy," these new regulations create significant barriers for the very citizens who are footing the bill for this transition.

The most pressing concern is the shift toward a Gross Metering style philosophy, which devalues the clean energy we contribute to the national pool. By proposing a buyback rate that is significantly lower than the cost of grid power, NEPRA is effectively creating a "solar tax" on households. This move ignores the reality that prosumers have saved the government billions by reducing the need for expensive furnace oil and LNG imports during peak daylight hours. Shifting the financial goalposts now will discourage future investment and kill the momentum of a sector that saw a record 1.25 GWh of battery storage integration in 2024.

Furthermore, the proposed fixed monthly charges for solar users are discriminatory. Solar prosumers already pay significant upfront costs, including a 10% GST on components as per the latest budget, and they continue to pay grid taxes on any units they consume from the DISCOs.

Adding an extra "fixed fee" simply for being connected to the grid penalizes efficiency and environment-friendly behavior. It is illogical to punish citizens for reducing their carbon footprint when the state is struggling to meet international climate commitments and grid modernization.

Lastly, the lack of transparency in how these new rates were calculated is troubling. Consumers need a stable and predictable regulatory environment to justify long-term investments. We suggest that instead of curbing solar exports, NEPRA should introduce Time-of-Use (ToU) incentives that encourage consumers to export power during the grid's most stressed periods. We request the Authority to withdraw these amendments and engage in a meaningful dialogue with consumer protection groups to find a solution that does not sacrifice the interests of the common man to protect the margins of inefficient power companies.

Your Sincerely,

Jawad Musaddiq
W-166 Phase III, DHA , Lahore
Reference no. 16115230805902U

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 2:00 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

From: Awais Malik <eng.malikawais@gmail.com>
Sent: Wednesday, January 14, 2026 1:34 PM
To: registrar@nepra.org.pk
Subject: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

Dear Sir,

Reference to your publication regarding Prosumer Regulation 2025 in the newspaper dated 15th December 2025, I am writing as a concerned citizen and existing solar Net metering consumer to formally record my reservations regarding the recently proposed "NEPRA Prosumer Regulations, 2025." While I appreciate the Authority's efforts to ensure grid stability and manage the growing distributed generation capacity, certain clauses in the draft are highly discouraging for renewable energy adoption in Pakistan.

1. Objection to the Change in Net Metering Mechanism

The shift from the existing Net Metering (unit-to-unit adjustment) to a Net Billing/Gross Metering model is a significant setback. By slashing the buyback rate to the National Average Energy Purchase Price (approx. Rs. 13/unit) while charging retail rates for imports (approx. Rs. 50-60/unit), the financial viability of solar investments for middle-class households is effectively destroyed.

The 2015 Regulations provided a fair incentive for citizens to invest their own capital to bridge the national energy gap. I request the Authority to revert to the original Net Metering mechanism to maintain consumer trust and continue the momentum of Green Energy.

2. Acceptance of Technical Constraints

I recognize that the rapid growth of solar generation poses technical challenges to the aging distribution infrastructure. In this regard, I find the following proposed changes to be reasonable and acceptable:

- Sanctioned Load Clause: Limiting the solar system capacity to 100% of the Sanctioned Load (instead of 150%) is a fair measure to ensure that the household's export does not exceed its authorized grid connection capacity.
- Transformer Capacity Clause: Restricting new connections once a transformer reaches 80% of its capacity is a logical technical safeguard to prevent local grid failures and protect equipment.

3. Re-evaluation of IPP Agreements and Capacity Payments

Beyond the technicalities of net metering, the primary driver behind the current energy crisis is the existence of unfair and unsustainable agreements with Independent Power Producers (IPPs). For decades, the national economy has been bled dry by "Take-or-Pay" clauses, where the government is forced to pay billions in "capacity charges" for electricity that is never actually produced or consumed. These dollar-indexed returns and sovereign guarantees have created an artificial tariff hike that is killing industrial productivity and pushing the common man below the poverty line. It is high time the government takes decisive steps to renegotiate or terminate these lopsided contracts, transitioning instead to a "Take-

“and-Pay” model. We cannot expect the public to subsidize the inefficiencies of the power sector and the excessive profits of a few influential groups while the rest of the country’s economy remains in a state of paralysis.

4. Contribution to Reducing the National Fuel Import Bill

It is critical to acknowledge that Net-Metering consumers are not a burden, but a major contributor to the national exchequer. In FY 2024-25 alone, net-metered solar capacity in Pakistan crossed 5,800 MW, significantly reducing the need for expensive thermal power generation. By generating clean energy during peak daylight hours, consumers directly displace electricity that would otherwise be produced using imported FO (Furnace Oil) and RLNG (Regasified Liquefied Natural Gas). Recent data indicates that this decentralized generation has helped the country save billions in foreign exchange and even contributed to negative Fuel Charge Adjustments (FCA), providing relief to all grid consumers. Discouraging net metering now would essentially force the country back toward a heavy reliance on imported fossil fuels, further draining our precious foreign exchange reserves and worsening the trade deficit.

5. Environmental Survival and the Transition to Electric Vehicles (EVs)

Finally, it must be noted that Pakistan is already among the countries most vulnerable to climate change, with cities like Lahore and Multan suffering from hazardous smog levels every winter. Slowing down solar deployment by making it financially unviable will force a continued reliance on coal and oil-based power plants, which are primary contributors to particulate matter and poor air quality. Furthermore, the Government’s own Electric Vehicle (EV) Policy depends entirely on the availability of economical and clean electricity. If net-metering benefits are withdrawn, the incentive for citizens to switch to EVs will vanish, as charging vehicles from an expensive and "dirty" national grid offers no relief. To achieve a "Clean Green Pakistan" and a smog-free future, the Authority must encourage solar energy as the backbone for an affordable EV charging infrastructure.

6. Recommendations

Instead of penalizing prosumers through reduced buyback rates, I urge NEPRA to:

- Maintain the unit-to-unit adjustment (Net Metering) as per the 2015 policy.
- Enforce strict compliance with Sanctioned Load and Transformer Loading limits to address grid stability.
- Re-evaluate expensive IPP Agreements
- Encourage Solar energy so that we can further reduce our import bill
- Wisely facilitate solar energy consumers to cater to escalating environmental challenges, ensuring that clean energy remains the primary tool for national growth rather than a casualty of regulatory shifts.

The proposed 2025 regulations, in their current form, will stall Pakistan’s progress toward its renewable energy targets and increase the burden on already struggling consumers. I hope the Authority will consider these points during the public consultation process.

Yours Sincerely,

Name: Muhammad Awais Malik

CNIC: 37405-4849600-5

Mobile: +92 334 5933570

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 16 January, 2026 9:05 AM
To: Shahid Farooque
Subject: Fwd: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

Importance: High

----- Original Message -----

Subject: Fwd: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment
Date: 2026-01-15 15:19
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment
Date: 2026-01-15 12:41
From: Labeeb Ur Rehman <rehmans928@hotmail.com>
To: "Registrar@nepra.org.pk" <Registrar@nepra.org.pk>, "Chairman@nepra.org.pk" <Chairman@nepra.org.pk>, "cad@nepra.org.pk" <cad@nepra.org.pk>

Wasim Anwar Bhinder

Registrar Nepra
Nepra Tower, Attaturk Avenue (East) G-5/1, Islamabad.

Subject: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment
Dear Sir,

Reference to your publication regarding Prosumers Regulation 2025 in the newspaper dated 15th December 2025, I am writing as a concerned citizen and existing solar Net metering consumer to formally record my reservations regarding the recently proposed "NEPRA Prosumer Regulations, 2025." While I appreciate the Authority's efforts to ensure grid stability and manage the growing distributed generation capacity, however certain clauses in the draft are highly discouraging for renewable energy adoption in Pakistan.

1. Objection to the Change in Net Metering Mechanism

The shift from the existing Net Metering (unit-to-unit adjustment) to a Net Billing/Gross Metering model is a significant setback. By slashing the buyback rate to the National Average Energy Purchase Price (approx. Rs. 13/unit) while charging retail rates for imports (approx. Rs. 50-60/unit), the financial viability of solar investments for middle-class households is effectively destroyed.

The 2015 Regulations provided a fair incentive for citizens to invest their own capital to bridge the national energy gap. I request the Authority to revert to the original Net Metering mechanism to maintain consumer trust and continue the momentum of Green Energy.

2. Acceptance of Technical Constraints

I recognize that the rapid growth of solar generation poses technical challenges to the aging distribution infrastructure. In this regard, I find the following proposed changes to be reasonable and acceptable:

* Sanctioned Load Clause: Limiting the solar system capacity to 100% of the Sanctioned Load (instead of 150%) is a fair measure to ensure that the household's export does not exceed its authorized grid connection capacity.

* Transformer Capacity Clause: Restricting new connections once a transformer reaches 80% of its capacity is a logical technical safeguard to prevent local grid failures and protect equipment.

3. Re-evaluation of IPP Agreements and Capacity Payments

Beyond the technicalities of net metering, the primary driver behind the current energy crisis is the existence of unfair and unsustainable agreements with Independent Power Producers (IPPs). For decades, the national economy has been bled dry by "Take-or-Pay" clauses, where the government is forced to pay billions in "capacity charges" for electricity that is never actually produced or consumed. These dollar-indexed returns and sovereign guarantees have created an artificial tariff hike that is killing industrial productivity and pushing the common man below the poverty line. It is high time the government takes decisive steps to renegotiate or terminate these lopsided contracts, transitioning instead to a "Take-and-Pay" model. We cannot expect the public to subsidize the inefficiencies of the power sector and the excessive profits of a few influential groups while the rest of the country's economy remains in a state of paralysis.

4. Contribution to Reducing the National Fuel Import Bill

It is critical to acknowledge that Net-Metering consumers are not a burden, but a major contributor to the national exchequer. In FY 2024-25 alone, net-metered solar capacity in Pakistan crossed 5,800 MW, significantly reducing the need for expensive thermal power generation.

By generating clean energy during peak daylight hours, consumers directly displace electricity that would otherwise be produced using imported FO (Furnace Oil) and RLNG (Regasified Liquefied Natural Gas).

Recent data indicates that this decentralized generation has helped the country save billions in foreign exchange and even contributed to negative Fuel Charge Adjustments (FCA), providing relief to all grid consumers. Discouraging net metering now would essentially force the country back toward a heavy reliance on imported fossil fuels, further draining our precious foreign exchange reserves and worsening the trade deficit.

5. Environmental Survival and the Transition to Electric Vehicles (EVs)

Finally, it must be noted that Pakistan is already among the countries most vulnerable to climate change, with cities like Lahore and Multan suffering from hazardous smog levels every winter. Slowing down solar deployment by making it financially unviable will force a continued reliance on coal and oil-based power plants, which are primary contributors to particulate matter and poor air quality. Furthermore, the Government's own Electric Vehicle (EV) Policy depends entirely on the availability of economical and clean electricity. If net-metering benefits are withdrawn, the incentive for citizens to switch to EVs will vanish, as charging vehicles from an expensive and "dirty" national grid offers no relief. To achieve a "Clean Green Pakistan" and a smog-free future, the Authority must encourage solar energy as the backbone for an affordable EV charging infrastructure.

6. Recommendations

Instead of penalizing prosumers through reduced buyback rates, I urge NEPRA to:

- * Maintain the unit-to-unit adjustment (Net Metering) as per the 2015 policy.
- * Enforce strict compliance with Sanctioned Load and Transformer Loading limits to address grid stability.
- * Re-evaluate expensive IPP Agreements
- * Encourage Solar energy so that we can further reduce our import bill
- * Wisely facilitate solar energy consumers to cater to escalating environmental challenges, ensuring that clean energy remains the primary tool for national growth rather than a casualty of regulatory shifts.

The proposed 2025 regulations, in their current form, will stall Pakistan's progress toward its renewable energy targets and increase the burden on already struggling consumers. I hope the Authority will consider these points during the public consultation process.

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:54 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

-----Original Message-----

From: Baseer Alam <balam512@gmail.com>
Sent: Tuesday, January 13, 2026 10:10 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Dear Sir ,

1. I submit my objections to the Draft Subject, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

2. The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change 3. As a consumer of (BTPL) I am already adversely affected by: Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

4. Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

5. In view of above facts, I expect NEPRA to Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL and objections may kindly be placed on record and duly considered before finalization of the regulations.

7. Forwarded for your information/ further necessary action otherwise I WILL BE DISENGAGE FROM WAPDA AND KEEP GENERATOR IN ADDITION TO SOLAR SYSTEM BEING IPP and COPE UP MY DEFICIENCIES.

Yours sincerely,

Colonel Syed Baseer Alam Retired .

BTPL Consumer .

House 4, Nisar Road ,Westridge 2 , Rawalpindi Cantt Cell 03025550102

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:54 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

From: Engr Iftikhar Ahmed <engr.iftikhar98@gmail.com>
Sent: Tuesday, January 13, 2026 7:49 PM
To: registrar@nepra.org.pk
Subject: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

Dear Sir,

Reference to your publication regarding Prosumer Regulation 2025 in the newspaper dated 15th December 2025, I am writing as a concerned citizen and existing solar Net metering consumer to formally record my reservations regarding the recently proposed "NEPRA Prosumer Regulations, 2025." While I appreciate the Authority's efforts to ensure grid stability and manage the growing distributed generation capacity, however certain clauses in the draft are highly discouraging for renewable energy adoption in Pakistan.

1. Objection to the Change in Net Metering Mechanism

The shift from the existing Net Metering (unit-to-unit adjustment) to a Net Billing/Gross Metering model is a significant setback. By slashing the buyback rate to the National Average Energy Purchase Price (approx. Rs. 13/unit) while charging retail rates for imports (approx. Rs. 50-60/unit), the financial viability of solar investments for middle-class households is effectively destroyed.

The 2015 Regulations provided a fair incentive for citizens to invest their own capital to bridge the national energy gap. I request the Authority to revert to the original Net Metering mechanism to maintain consumer trust and continue the momentum of Green Energy.

2. Acceptance of Technical Constraints

I recognize that the rapid growth of solar generation poses technical challenges to the aging distribution infrastructure. In this regard, I find the following proposed changes to be reasonable and acceptable:

✓ Sanctioned Load Clause: Limiting the solar system capacity to 100% of the Sanctioned Load (instead of 150%) is a fair measure to ensure that the household's export does not exceed its authorized grid connection capacity.

✓ Transformer Capacity Clause: Restricting new connections once a transformer reaches 80% of its capacity is a logical technical safeguard to prevent local grid failures and protect equipment.

3. Re-evaluation of IPP Agreements and Capacity Payments

Beyond the technicalities of net metering, the primary driver behind the current energy crisis is the existence of unfair and unsustainable agreements with Independent Power Producers (IPPs). For decades, the national economy has been bled dry by "Take-or-Pay" clauses, where the government is forced to pay billions in "capacity charges" for electricity that is never actually produced or consumed. These dollar-indexed returns and sovereign guarantees have created an artificial tariff hike that is killing industrial productivity and pushing the common man below the poverty line. It is high time the government takes decisive steps to renegotiate or terminate these lopsided contracts, transitioning instead to a "Take-and-Pay" model. We cannot expect the public to subsidize the inefficiencies of the power sector and the excessive profits of a few influential groups while the rest of the country's economy remains in a state of paralysis.

4. Contribution to Reducing the National Fuel Import Bill

It is critical to acknowledge that Net-Metering consumers are not a burden, but a major contributor to the national exchequer. In FY 2024-25 alone, net-metered solar capacity in Pakistan crossed 5,800 MW, significantly reducing the need for expensive thermal power generation. By generating clean energy during peak daylight hours, consumers directly displace electricity that would otherwise be produced using imported FO (Furnace Oil) and RLNG (Regasified Liquefied Natural Gas). Recent data indicates that this decentralized generation has helped the country save billions in foreign exchange and even contributed to negative Fuel Charge Adjustments (FCA), providing relief to all grid consumers. Discouraging net metering now would essentially force the country back toward a heavy reliance on imported fossil fuels, further draining our precious foreign exchange reserves and worsening the trade deficit.

5. Environmental Survival and the Transition to Electric Vehicles (EVs)

Finally, it must be noted that Pakistan is already among the countries most vulnerable to climate change, with cities like Lahore and Multan suffering from hazardous smog levels every winter. Slowing down solar deployment by making it financially unviable will force a continued reliance on coal and oil-based power plants, which are primary contributors to particulate matter and poor air quality. Furthermore, the Government's own Electric Vehicle (EV) Policy depends entirely on the availability of economical and clean electricity. If net-metering benefits are withdrawn, the incentive for citizens to switch to EVs will vanish, as charging vehicles from an expensive and "dirty" national grid offers no relief. To achieve a "Clean Green Pakistan" and a smog-free future, the Authority must encourage solar energy as the backbone for an affordable EV charging infrastructure.

6. Recommendations

Instead of penalizing prosumers through reduced buyback rates, I urge NEPRA to:

Maintain the unit-to-unit adjustment (Net Metering) as per the 2015 policy.

Enforce strict compliance with Sanctioned Load and Transformer Loading limits to address grid stability.

Re-evaluate expensive IPP Agreements

Encourage Solar energy so that we can further reduce our import bill

Wisely facilitate solar energy consumers to cater to escalating environmental challenges, ensuring that clean energy remains the primary tool for national growth rather than a casualty of regulatory shifts.

The proposed 2025 regulations, in their current form, will stall Pakistan's progress toward its renewable energy targets and increase the burden on already struggling consumers. I hope the Authority will consider these points during the public consultation process.

Yours Sincerely,

Name: Iftikhar Ahmed

CNIC: 82203-9654747-9

Mobile: 03408098298

Address: House No 95-H Street 2-H Model colony Gulberg 3 LHR

Email: enr.iftikhar98@gmail.com

Shaïd UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 1:15 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Presentation Against the Proposed 2025 Net-Billing Amendments (Reference no. 16115230805902U)

-----Original Message-----

From: info@urbansole.com.pk <info@urbansole.com.pk>
Sent: Wednesday, January 14, 2026 12:45 PM
To: Registrar <registrar@nepra.org.pk>
Cc: Jawad <jawad@urbansole.com.pk>
Subject: Presentation Against the Proposed 2025 Net-Billing Amendments (Reference no. 16115230805902U)

Respected Registrar,

،کم ی عل السلام

We are writing to formally submit our opposition to the proposed amendments regarding distributed generation. These regulations threaten to dismantle the progress made by thousands of Pakistani households and businesses who have utilized their own savings to solve the national energy crisis.

A primary concern is the proposed reduction of the buyback rate at a time when the cost of living and inflation remain high. By significantly lowering the compensation for surplus energy exported to the grid, NEPRA is effectively subsidizing inefficient power distribution companies (DISCOs) at the expense of private citizens. This policy shift ignores the fact that presumes have added massive decentralized capacity to the grid, surpassing 1.25 GWh of storage in 2024 alone, without a single rupee of government subsidy or sovereign guarantee.

Additionally, the new regulations create a "policy trap" for those who have already entered into long-term agreements. Any retrospective change to the tariff or the duration of existing licenses is a violation of the contractual trust between the state and its citizens. Such inconsistency creates a climate of uncertainty that will drive away future investors and halt the growth of the local solar industry. Instead of imposing restrictions, NEPRA should be facilitating the transition to "Smart Grids" where citizens are treated as partners in power generation, not as a source of extra revenue through new fixed charges.

Finally, we believe these amendments prioritize the protection of the traditional, expensive power model over the modern, clean energy future Pakistan desperately needs. We urge the Authority to reconsider these measures and instead focus on incentivizing the adoption of battery storage to manage peak loads. We request that NEPRA maintains the current one-to-one net metering benefits and protects the rights of the common man who is simply seeking relief from the highest electricity prices in the region.

Your Sincerely,

Jawad Musaddiq
W-166 Phase III, DHA , Lahore

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:53 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Feedback on the draft of the National Electric Power Regulatory Authority (Prosumer) Regulations, 2025

From: Muhammad Yousaf <engrmyaj@gmail.com>
Sent: Tuesday, January 13, 2026 5:14 PM
To: registrar@nepra.org.pk
Subject: Feedback on the draft of the National Electric Power Regulatory Authority (Prosumer) Regulations, 2025

The Registrar,

National Electric Power Regulatory Authority (NEPRA) Islamabad, Pakistan

Respected Sir,

I am writing to NEPRA's draft of the National Electric Power Regulatory Authority (Prosumer) Regulations, 2025, scheduled for implementation once approved.

The proposed framework effectively discontinues Net Metering and replaces it with Net Billing at significantly reduced purchase rates for existing consumers instead of netting off the off-peak imported units with off-peak exported units. This change materially undermines the financial viability of solar investments made in good faith under NEPRA-approved Net Metering regulations.

Thousands of consumers installed solar systems based on officially approved payback assumptions and government encouragement of renewable energy. Applying this policy retrospectively to existing net metering licensees is unjust, violates legitimate expectations, and seriously damages investor confidence in Pakistan's renewable energy sector.

Furthermore, the public hearing process for this policy allowed limited participation, restricting meaningful consumer input. A policy of this magnitude requires transparent, inclusive, and broad-based stakeholder consultation.

If implemented as proposed, this policy will:

- Penalize early adopters of clean energy
- Discourage future renewable energy investment
- Increase the financial burden on middle-income households
- Undermine regulatory credibility and stability
- Contradict national energy sustainability and climate goals

In view of the above, I respectfully request NEPRA to:

1. Fully exempt all existing Net Metering consumers from the proposed Net Billing Policy
2. Apply any revised framework only to future applicants, with a reasonable transition period

I urge NEPRA to reconsider this proposal in the broader national interest and to protect consumers who invested in renewable energy in compliance with prevailing laws and regulations.

Yours sincerely,

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:55 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Prosumer regulation

From: Afsheen jamil <afsheen.jamil48@gmail.com>
Sent: Wednesday, January 14, 2026 1:19 AM
To: registrar@nepra.org.pk
Subject: Prosumer regulation

Wasim Anwar Bhinder
Registrar Nepra
Nepra Tower, Attaturk Avenue (East) G-5/1, Islamabad.

Subject : Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment
Dear Sir,

Reference to your publication regarding Prosumer Regulation 2025 in the newspaper dated 15th December 2025, I am writing as a concerned citizen and existing solar Net metering consumer to formally record my reservations regarding the recently proposed "NEPRA Prosumer Regulations, 2025." While I appreciate the Authority's efforts to ensure grid stability and manage the growing distributed generation capacity, however certain clauses in the draft are highly discouraging for renewable energy adoption in Pakistan.

1. Objection to the Change in Net Metering Mechanism

The shift from the existing Net Metering (unit-to-unit adjustment) to a Net Billing/Gross Metering model is a significant setback. By slashing the buyback rate to the National Average Energy Purchase Price (approx. Rs. 13/unit) while charging retail rates for imports (approx. Rs. 50-60/unit), the financial viability of solar investments for middle-class households is effectively destroyed.

The 2015 Regulations provided a fair incentive for citizens to invest their own capital to bridge the national energy gap. I request the Authority to revert to the original Net Metering mechanism to maintain consumer trust and continue the momentum of Green Energy.

2. Acceptance of Technical Constraints

I recognize that the rapid growth of solar generation poses technical challenges to the aging distribution infrastructure. In this regard, I find the following proposed changes to be reasonable and acceptable:

- Sanctioned Load Clause: Limiting the solar system capacity to 100% of the Sanctioned Load (instead of 150%) is a fair measure to ensure that the household's export does not exceed its authorized grid connection capacity.
- Transformer Capacity Clause: Restricting new connections once a transformer reaches 80% of its capacity is a logical technical safeguard to prevent local grid failures and protect equipment.

3. Re-evaluation of IPP Agreements and Capacity Payments

Beyond the technicalities of net metering, the primary driver behind the current energy crisis is the existence of unfair and unsustainable agreements with Independent Power Producers (IPPs). For decades, the national economy has been bled dry by "Take-or-Pay" clauses, where the government is forced to pay billions in "capacity charges" for electricity that is never actually produced or consumed. These dollar-indexed returns and sovereign guarantees have created an artificial tariff hike that is killing industrial productivity and pushing the common man below the poverty line. It is high time the government takes decisive steps to renegotiate or terminate these lopsided contracts, transitioning instead to a "Take-and-Pay" model. We cannot expect the

- public to subsidize the inefficiencies of the power sector and the excessive profits of a few influential groups while the rest of the country's economy remains in a state of paralysis.

4. Contribution to Reducing the National Fuel Import Bill

It is critical to acknowledge that Net-Metering consumers are not a burden, but a major contributor to the national exchequer. In FY 2024-25 alone, net-metered solar capacity in Pakistan crossed 5,800 MW, significantly reducing the need for expensive thermal power generation. By generating clean energy during peak daylight hours, consumers directly displace electricity that would otherwise be produced using imported FO (Furnace Oil) and RLNG (Regasified Liquefied Natural Gas). Recent data indicates that this decentralized generation has helped the country save billions in foreign exchange and even contributed to negative Fuel Charge Adjustments (FCA), providing relief to all grid consumers. Discouraging net metering now would essentially force the country back toward a heavy reliance on imported fossil fuels, further draining our precious foreign exchange reserves and worsening the trade deficit.

5. Environmental Survival and the Transition to Electric Vehicles (EVs)

Finally, it must be noted that Pakistan is already among the countries most vulnerable to climate change, with cities like Lahore and Multan suffering from hazardous smog levels every winter. Slowing down solar deployment by making it financially unviable will force a continued reliance on coal and oil-based power plants, which are primary contributors to particulate matter and poor air quality. Furthermore, the Government's own Electric Vehicle (EV) Policy depends entirely on the availability of economical and clean electricity. If net-metering benefits are withdrawn, the incentive for citizens to switch to EVs will vanish, as charging vehicles from an expensive and "dirty" national grid offers no relief. To achieve a "Clean Green Pakistan" and a smog-free future, the Authority must encourage solar energy as the backbone for an affordable EV charging infrastructure.

6. Recommendations

Instead of penalizing prosumers through reduced buyback rates, I urge NEPRA to:

- Maintain the unit-to-unit adjustment (Net Metering) as per the 2015 policy.
- Enforce strict compliance with Sanctioned Load and Transformer Loading limits to address grid stability.
- Re-evaluate expensive IPP Agreements
- Encourage Solar energy so that we can further reduce our import bill
- Wisely facilitate solar energy consumers to cater to escalating environmental challenges, ensuring that clean energy remains the primary tool for national growth rather than a casualty of regulatory shifts.

The proposed 2025 regulations, in their current form, will stall Pakistan's progress toward its renewable energy targets and increase the burden on already struggling consumers. I hope the Authority will consider these points during the public consultation process.

Yours Sincerely,

Afsheen Butt
CNIC 3520221932806
Mobile 03214904044

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:54 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Comments on Draft National Electric Power Regulatory Authority (PROSUMER) Regulations, 2025
Attachments: Comments on NEPRA solar Policy .docx

From: Mohammad Malik <mn55malik@gmail.com>
Sent: Tuesday, January 13, 2026 11:16 PM
To: registrar@nepra.org.pk
Subject: Comments on Draft National Electric Power Regulatory Authority (PROSUMER) Regulations, 2025

Dear Sir please find attached comments on the above subject

Regards,
M. Naeem Malik

Comments on NEPRA (Prosumer) Regulations, 2025

Submitted in Public Interest

1. Overall Observation – One-Sided Protection of Conventional Generation Companies

The proposed Prosumer Regulations, 2025 appear **overly tilted in favour of existing generation companies and DISCOs**, while placing disproportionate restrictions and commercial disadvantages on distributed renewable energy investors and consumers. This approach contradicts Pakistan's stated objectives of:

- Affordable electricity,
- Energy security,
- Reduction in circular debt, and
- Promotion of indigenous and clean energy resources.

Distributed solar and wind were encouraged precisely because large-scale generation companies **failed to reliably meet national demand**, resulting in chronic load management and consumer hardship.

2. Public Interest and Consumer Impact

Even today, **prolonged load scheduling after every 2–3 days** continues across many regions, directly impacting households, SMEs, and industry. In contrast:

- Prosumers supply electricity **at the consumer's doorstep**,
- Reduce stress on transmission and distribution networks,
- Minimise line losses, and
- Improve voltage and reliability at local levels.

Restricting or financially penalising prosumers effectively **penalises consumers who invested their own capital** to ensure energy security in the absence of reliable grid supply.

3. Investor Confidence and Policy Stability

Thousands of consumers invested in rooftop solar **based on existing policy signals and regulatory encouragement**. Abrupt policy changes—particularly changes to billing methodology and pricing under Regulation 14—risk:

- Undermining investor confidence,
- Creating stranded investments,
- Sending negative signals to future local and foreign investors in renewables.

Policy inconsistency is particularly damaging in capital-intensive sectors such as energy, where payback periods span several years.

4. Net Billing at National Average Energy Purchase Price

Billing surplus energy at the **national average energy purchase price** (Regulation 14) fails to recognise the true value of distributed generation, which:

- Avoids capacity payments,
- Reduces peak demand,
- Saves foreign exchange by lowering fuel imports, and
- Lowers system-wide losses.

This pricing mechanism effectively **subsidises inefficient and loss-making large generators**, while disincentivising efficient, clean, and decentralised energy solutions.

5. Misplaced Attribution of Sector Losses

The financial losses of generation companies primarily arise from:

- Capacity payments,
- Inefficient fuel procurement,
- Circular debt accumulation,
- Governance and dispatch inefficiencies.

Blaming distributed solar and wind for these structural issues is **misdirected and unjustified**. Prosumers did not create these inefficiencies; rather, they emerged as a **market-driven response** to them.

6. Clean Energy and National Interest

Solar and wind energy:

- Are indigenous,
- Reduce reliance on imported fuels,
- Support Pakistan's climate commitments,
- Lower long-term system costs.

Any policy that slows their adoption **works against national economic, environmental, and strategic interests**, especially when Pakistan already faces balance-of-payments pressure.

7. Suggested Way Forward

Instead of restricting prosumers, NEPRA may consider:

- Gradual and predictable policy transitions (grandfathering existing investors),

- Time-of-use based export pricing.
- Grid support charges are transparently linked to actual costs,
- Incentivising storage and smart inverters,
- Aligning DISCO efficiency improvements with renewable expansion.

8. Concluding Remarks

The proposed regulations, in their current form, **do not adequately balance public interest, consumer welfare, investor protection, and national energy objectives**. A fair, consultative, and data-driven revision is essential to ensure that Pakistan continues moving toward affordable, clean, and reliable electricity rather than reverting to an expensive and inefficient centralized generation model. The Licenses already issued should be extended till 2030. The revised Policy drawn, after consultation of all stake holders, should be implemented after 2030.

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:55 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Proposed policy changes for Net-metering

From: Imran Iqbal <imraniqbal74@gmail.com>
Sent: Tuesday, January 13, 2026 11:31 PM
To: chairman@nepra.org.pk; registrar@nepra.org.pk
Subject: Proposed policy changes for Net-metering

Dear Sir / Madam,

I am writing with regards to the proposed changes in net-metering regulations and the introduction of net-billing mechanism. In my opinion, this is too early to introduce such discouraging measures. The changes should be introduced gradually. Net-billing policy will massively impact solar producers/prosumers. At this stage, it would be better to only reduce the buy-back rate but with limited reduction. for example: reduction of buy back rate from PKR 24 to PKR 20 per exported unit. Over a period of 3-4 years, only the buy back rate should be reduced gradually. Net-billing should never be introduced. Other countries are instead offering incentives and subsidies, whereas we are thinking of discouraging solar adoption and that too with sudden strict measures. There may be some countries who have introduced net-billing, but the rate of electricity in those countries is already very low for consumers. In Pakistan, the cost of electricity is very high and net-metering serves as some cost saving, especially to a person like me who is already paying direct taxes on salary every month and other taxes on all consumer goods including fuel.

I therefore humbly request you to please discard the introduction of Net-billing and let the net-metering solar systems continue and make the changes gradually in buy back rate every other year for the new net-metering joiners on the grid.

Kind Regards
Imran Iqbal

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:55 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Strong Objection to Proposed Net Billing Policy and Request for Protection of Existing Net Metering Consumers**

-----Original Message-----

From: Nehal Butt <nehalbutt@gmail.com>
Sent: Wednesday, January 14, 2026 12:25 AM
To: registrar@nepra.org.pk
Subject: Strong Objection to Proposed Net Billing Policy and Request for Protection of Existing Net Metering Consumers**

Respected Sir,

I am writing to express my serious concern and strong objection to NEPRA's proposed ****Net Billing Policy****, scheduled to be implemented with effect from ****14 January 2026****, as published on NEPRA's website.

The proposed policy effectively ****ends Net Metering**** and replaces it with a Net Billing mechanism that is financially detrimental to electricity consumers who invested in renewable energy in good faith, based on the existing regulatory framework. The drastic reduction in the purchase rate—****Rs. 11.5 per unit for new consumers and Rs. 27 per unit for existing consumers****—fundamentally alters the economic viability of solar investments.

Thousands of consumers installed solar systems after making long-term financial commitments, relying on NEPRA-approved Net Metering regulations, approved payback periods, and government encouragement of renewable energy. Retrospective application of this policy to ****existing licensees**** is unjust, violates legitimate consumer expectations, and severely undermines investor confidence in Pakistan's renewable energy sector.

Additionally, the public hearing process for this policy was conducted with ****restricted participation****, which limited meaningful consumer representation. Such a significant policy shift warrants broad, transparent, and inclusive stakeholder consultation.

This policy will:

- * Penalize early adopters of clean energy
- * Discourage future investment in renewable generation
- * Increase financial burden on middle-income households
- * Damage trust in regulatory stability
- * Contradict national goals of energy sustainability and climate resilience

In light of the above, I respectfully request NEPRA to:

1. ****Completely exempt all existing Net Metering consumers**** from the proposed Net Billing Policy
2. Apply any new framework ****only to future applicants****, with adequate transition time
3. Re-conduct public hearings with ****open and meaningful consumer participation****
4. Publish a transparent financial and economic justification for the proposed rates

• I urge NEPRA to reconsider this policy in the larger national interest and protect consumers who acted responsibly and in accordance with prevailing laws and regulations.

I hope NEPRA will uphold fairness, regulatory consistency, and consumer confidence.

Yours sincerely,

Nehal butt
Rawalpindi

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:54 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Formal Objection to Draft NEPRA Prosumer Regulations 2025 and Request for Amendments

From: PES PK <info@pes-pk.com>
Sent: Tuesday, January 13, 2026 7:53 PM
To: registrar@nepra.org.pk
Cc: mubashiriftikhar@hotmail.com; ul Hassan Mansoor <gmpower@pes-pk.com>; technicalsupport@professionallubes.com; Awais Khalid <buh@pes-pk.com>
Subject: Formal Objection to Draft NEPRA Prosumer Regulations 2025 and Request for Amendments

To,

Wasim Anwar Bhinder
Registrar NEPRA
NEPRA Tower, Attaturk Avenue (East)
G-5/1, Islamabad

Date: Tuesday, January 13, 2026

Dear Sir,

With reference to NEPRA's draft *Prosumer Regulations, 2025* published on 15th December 2025, I wish to formally record my objections as a solar net-metering consumer and renewable energy stakeholder.

The proposed shift from Net Metering (unit-to-unit adjustment) to Net Billing/Gross Metering with a buyback rate of approximately Rs. 13/unit—while charging consumers Rs. 50–60/unit for grid imports—will render residential and commercial solar investments financially unviable. This policy reversal will severely damage investor confidence and stall Pakistan's renewable energy progress.

I acknowledge and support technical safeguards such as:

- Limiting solar capacity to 100% of sanctioned load
- Restricting new connections when transformer loading reaches 80%

However, penalizing prosumers instead of addressing the root causes of high tariffs—namely unsustainable IPP capacity payment agreements—places an unfair burden on consumers who are actively contributing to national energy security.

Net-metered solar capacity has already crossed 5,800 MW, reducing reliance on imported furnace oil and RLNG, saving billions in foreign exchange, and lowering fuel charge adjustments. Discouraging solar adoption will reverse these gains and worsen Pakistan's trade deficit.

- Furthermore, affordable solar power is essential for Pakistan's climate resilience, smog reduction, and successful implementation of the national Electric Vehicle policy.

I respectfully recommend that NEPRA:

- Retain the 2015 Net Metering unit-to-unit mechanism
- Enforce grid stability through sanctioned load and transformer limits
- Re-evaluate unsustainable IPP capacity payment structures
- Encourage solar adoption to reduce fuel imports and environmental impact

The draft regulations, in their current form, will slow renewable energy growth and increase the burden on already struggling consumers.

Yours sincerely,

Farah Mubashir

CEO

Professional Energy Solutions (SMC-PVT) LTD

+92 345 4191944

CR/25/170/C-1 (Rev-1)

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:54 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Formal Objection to the Draft Prosumer Regulations 2025 and request to make amendments

From: Naqash Ahmed <naqashahmed@hotmail.com>
Sent: Tuesday, January 13, 2026 10:17 PM
To: registrar@nepra.org.pk
Subject: Formal Objection to the Draft Prosumer Regulations 2025 and request to make amendments

To,
Mr. Wasim Anwar Bhinder
Registrar Nepra
Nepra Tower, Attaturk Avenue (East) G-5/1, Islamabad.

Reference to your publication regarding Prosumer Regulation 2025 in the newspaper dated 15th December 2025, I am writing as a concerned citizen and existing solar Net metering consumer to formally record my reservations regarding the recently proposed "NEPRA Prosumer Regulations, 2025." While I appreciate the Authority's efforts to ensure grid stability and manage the growing distributed generation capacity, however certain clauses in the draft are highly discouraging for renewable energy adoption in Pakistan.

1. Objection to the Change in Net Metering Mechanism

The shift from the existing Net Metering (unit-to-unit adjustment) to a Net Billing/Gross Metering model is a significant setback. By slashing the buyback rate to the National Average Energy Purchase Price (approx. Rs. 13/unit) while charging retail rates for imports (approx. Rs. 50-60/unit), the financial viability of solar investments for middle-class households is effectively destroyed.

The 2015 Regulations provided a fair incentive for citizens to invest their own capital to bridge the national energy gap. I request the Authority to revert to the original Net Metering mechanism to maintain consumer trust and continue the momentum of Green Energy.

2. Acceptance of Technical Constraints

I recognize that the rapid growth of solar generation poses technical challenges to the aging distribution infrastructure. In this regard, I find the following proposed changes to be reasonable and acceptable:

- Sanctioned Load Clause: Limiting the solar system capacity to 100% of the Sanctioned Load (instead of 150%) is a fair measure to ensure that the household's export does not exceed its authorized grid connection capacity.
- Transformer Capacity Clause: Restricting new connections once a transformer reaches 80% of its capacity is a logical technical safeguard to prevent local grid failures and protect equipment.

3. Re-evaluation of IPP Agreements and Capacity Payments

Beyond the technicalities of net metering, the primary driver behind the current energy crisis is the existence of unfair and unsustainable agreements with Independent Power Producers (IPPs). For decades, the national economy has been bled dry by "Take-or-Pay" clauses, where the government is forced to pay billions in "capacity charges" for electricity that is never actually produced or consumed. These dollar-indexed returns and sovereign guarantees have created an artificial tariff hike that is killing industrial productivity and pushing the common man below the poverty line. It is high time the government takes decisive steps to renegotiate or terminate these lopsided contracts, transitioning instead to a "Take-and-Pay" model. We cannot expect the public to subsidize the inefficiencies of the power sector and the excessive profits of a few influential groups while the rest of the country's economy remains in a state of paralysis.

4. Contribution to Reducing the National Fuel Import Bill

It is critical to acknowledge that Net-Metering consumers are not a burden, but a major contributor to the national exchequer. In FY 2024-25 alone, net-metered solar capacity in Pakistan crossed 5,800 MW, significantly reducing the need for expensive thermal power generation. By generating clean energy during peak daylight hours, consumers directly displace electricity that would otherwise be produced using imported FO (Furnace Oil) and RLNG (Regasified Liquefied Natural Gas). Recent data indicates that this decentralized generation has helped the country save billions in foreign exchange and even contributed to negative Fuel Charge Adjustments (FCA), providing relief to all grid consumers. Discouraging net metering now would essentially force the country back toward a heavy reliance on imported fossil fuels, further draining our precious foreign exchange reserves and worsening the trade deficit.

5. Environmental Survival and the Transition to Electric Vehicles (EVs)

Finally, it must be noted that Pakistan is already among the countries most vulnerable to climate change, with cities like Lahore and Multan suffering from hazardous smog levels every winter. Slowing down solar deployment by making it financially unviable will force a continued reliance on coal and oil-based power plants, which are primary contributors to particulate matter and poor air quality. Furthermore, the Government's own Electric Vehicle (EV) Policy depends entirely on the availability of economical and clean electricity. If net-metering benefits are withdrawn, the incentive for citizens to switch to EVs will vanish, as charging vehicles from an expensive and "dirty" national grid offers no relief. To achieve a "Clean Green Pakistan" and a smog-free future, the Authority must encourage solar energy as the backbone for an affordable EV charging infrastructure.

6. Recommendations

Instead of penalizing prosumers through reduced buyback rates, I urge NEPRA to:

- Maintain the unit-to-unit adjustment (Net Metering) as per the 2015 policy.
- Enforce strict compliance with Sanctioned Load and Transformer Loading limits to address grid stability.
- Re-evaluate expensive IPP Agreements
- Encourage Solar energy so that we can further reduce our import bill
- Wisely facilitate solar energy consumers to cater to escalating environmental challenges, ensuring that clean energy remains the primary tool for national growth rather than a casualty of regulatory shifts.

The proposed 2025 regulations, in their current form, will stall Pakistan's progress toward its renewable energy targets and increase the burden on already struggling consumers. I hope the Authority will consider these points during the public consultation process.

Yours Sincerely,

Name Naqash Ahmed

CNIC 37405-2025918-5

Mobile +92336-0007011

Address House 2052-A, Street 65, Bahria Phase 3, Rawalpindi

Email: naqashahmed@hotmail.com

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 4:11 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Formal Objections to the Proposed Changes in Distributed Generation Regulations

From: Mohammed Faheem <faheemreso@gmail.com>
Sent: Tuesday, January 13, 2026 4:03 PM
To: registrar@nepra.org.pk
Subject: Formal Objections to the Proposed Changes in Distributed Generation Regulations

To: The Registrar, NEPRA
From: On behalf of the Residential and Commercial Solar Prosumers
Date: 13-01-2026
Subject: Formal Objections to the Proposed Changes in Distributed Generation Regulations

Respected Registrar,

We are writing to voice our serious reservations regarding the proposed overhaul of the net-metering framework. While the government encourages a transition to "Green Energy," these new regulations create significant barriers for the very citizens who are footing the bill for this transition.

The most pressing concern is the shift toward a Gross Metering style philosophy, which devalues the clean energy we contribute to the national pool. By proposing a buyback rate that is significantly lower than the cost of grid power, NEPRA is effectively creating a "solar tax" on households. This move ignores the reality that prosumers have saved the government billions by reducing the need for expensive furnace oil and LNG imports during peak daylight hours. Shifting the financial goalposts now will discourage future investment and kill the momentum of a sector that saw a record 1.25 GWh of battery storage integration in 2024.

Furthermore, the proposed fixed monthly charges for solar users are discriminatory. Solar prosumers already pay significant upfront costs, including a 10% GST on components as per the latest budget, and they continue to pay grid taxes on any units they consume from the DISCOs. Adding an extra "fixed fee" simply for being connected to the grid penalizes efficiency and environment-friendly behavior. It is illogical to punish citizens for reducing their carbon footprint when the state is struggling to meet international climate commitments and grid modernization.

Lastly, the lack of transparency in how these new rates were calculated is troubling. Consumers need a stable and predictable regulatory environment to justify long-term investments. We suggest that instead of curbing solar exports, NEPRA should introduce Time-of-Use (ToU) incentives that encourage consumers to export power during the grid's most stressed periods. We request the Authority to withdraw these amendments and engage in a meaningful dialogue with consumer protection groups to find a solution that does not sacrifice the interests of the common man to protect the margins of inefficient power companies.

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 3:21 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Presentation Against the Proposed 2025 Net-Billing Amendments / (Reference no. 16115230806100U / Musaddiq

From: Naveed Hussain (PA) <pa.slw@siddiqleather.com>
Sent: Tuesday, January 13, 2026 2:09 PM
To: registrar@nepra.org.pk
Cc: 'MIAN MUSADDIQ' <musaddiq@siddiqleather.com>
Subject: Presentation Against the Proposed 2025 Net-Billing Amendments / (Reference no. 16115230806100U / Musaddiq

Dated: 13 January , 206

To,
The Registrar,
NEPRA , Islamabad

Subject: Presentation Against the Proposed 2025 Net-Billing Amendments
(Reference no. 16115230806100U)

Respected Registrar,
السلام علیکم،

We are writing to formally submit our opposition to the proposed amendments regarding distributed generation. These regulations threaten to dismantle the progress made by thousands of Pakistani households and businesses who have utilized their own savings to solve the national energy crisis.

A primary concern is the proposed reduction of the buyback rate at a time when the cost of living and inflation remain high. By significantly lowering the compensation for surplus energy exported to the grid, NEPRA is effectively subsidizing inefficient power distribution companies (DISCOs) at the expense of private citizens. This policy shift ignores the fact that presumes have added massive decentralized capacity to the grid, surpassing 1.25 GWh of storage in 2024 alone, without a single rupee of government subsidy or sovereign guarantee.

Additionally, the new regulations create a "policy trap" for those who have already entered into long-term agreements. Any retrospective change to the tariff or the duration of existing licenses is a violation of the contractual trust between the state and its citizens. Such inconsistency creates a climate of uncertainty that will drive away future investors and halt the growth of the local solar industry. Instead of imposing restrictions, NEPRA should be facilitating the transition to "Smart Grids" where citizens are treated as partners in power generation, not as a source of extra revenue through new fixed charges.

Finally, we believe these amendments prioritize the protection of the traditional, expensive power model over the modern, clean energy future Pakistan desperately needs. We urge the Authority to reconsider these measures and instead focus on incentivizing the adoption of battery storage to manage peak loads. We request that NEPRA maintains the current one-to-one net metering benefits and protects the rights of the common man who is simply seeking relief from the highest electricity prices in the region.

Your Sincerely,

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 3:21 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Objections to the Proposed Changes in Distributed Generation / (Reference no. 16115230804901U / Awais Musaddiq

From: Naveed Hussain (PA) <pa.slw@siddiqleather.com>
Sent: Tuesday, January 13, 2026 2:28 PM
To: registrar@nepra.org.pk
Cc: 'Mian awais mus' <awais@siddiqleather.com>
Subject: Objections to the Proposed Changes in Distributed Generation / (Reference no. 16115230804901U / Awais Musaddiq

Dated: 13 January , 206

To,
The Registrar,
NEPRA , Islamabad

Subject: Objections to the Proposed Changes in Distributed Generation Regulations
(Reference no. 16115230804901U)

Respected Registrar,
السلام عليكم،

We are writing to voice our serious reservations regarding the proposed overhaul of the net-metering framework. While the government encourages a transition to "Green Energy," these new regulations create significant barriers for the very citizens who are footing the bill for this transition.

The most pressing concern is the shift toward a Gross Metering style philosophy, which devalues the clean energy we contribute to the national pool. By proposing a buyback rate that is significantly lower than the cost of grid power, NEPRA is effectively creating a "solar tax" on households. This move ignores the reality that prosumers have saved the government billions by reducing the need for expensive furnace oil and LNG imports during peak daylight hours. Shifting the financial goalposts now will discourage future investment and kill the momentum of a sector that saw a record 1.25 GWh of battery storage integration in 2024.

Furthermore, the proposed fixed monthly charges for solar users are discriminatory. Solar prosumers already pay significant upfront costs, including a 10% GST on components as per the latest budget, and they continue to pay grid taxes on any units they consume from the DISCOs. Adding an extra "fixed fee" simply for being connected to the grid penalizes efficiency and environment-friendly behavior. It is illogical to punish citizens for reducing their carbon footprint when the state is struggling to meet international climate commitments and grid modernization.

Lastly, the lack of transparency in how these new rates were calculated is troubling. Consumers need a stable and predictable regulatory environment to justify long-term investments. We suggest that instead of curbing solar exports, NEPRA should introduce Time-of-Use (ToU) incentives that encourage consumers to export power during the grid's most stressed periods. We request the Authority to withdraw these amendments and engage in a meaningful dialogue with consumer protection groups to find a solution that does not sacrifice the interests of the common man to protect the margins of inefficient power companies.

Your Sincerely,

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 3:21 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Concerns to the Proposed Inequitable Energy Exchange Ratio / (Reference no. 16115230797603U / Adeel Musaddiq

From: Naveed Hussain (PA) <pa.slw@siddiqleather.com>
Sent: Tuesday, January 13, 2026 2:40 PM
To: registrar@nepra.org.pk
Cc: 'Adeel Musaddiq' <adeel@siddiqleather.com>
Subject: Concerns to the Proposed Inequitable Energy Exchange Ratio / (Reference no. 16115230797603U / Adeel Musaddiq

Dated: 13 January , 206

To,
The Registrar,
NEPRA , Islamabad

Subject: Concerns to the Proposed Inequitable Energy Exchange Ratio
(Reference no. 161152307976003U)

Respected Registrar,
السلام عليكم،

We are writing to express our profound concern regarding the proposed amendments to the net-billing regulations, which threaten to make the exchange of solar energy fundamentally unfair for the average citizen. The most alarming aspect of this proposal is the massive disparity it creates between the price at which we buy electricity and the price at which we are forced to sell it. Under the new rates, a consumer would effectively have to export 5 to 6 units of clean solar energy just to offset the cost of 1 unit consumed from the grid at night. This ratio is economically unjustifiable and places an unreasonable burden on households that have invested their own capital to reduce the national energy deficit.

This "5-for-1" exchange logic ignores the technical and economic value that distributed solar provides to the national grid. During the blistering summer months of 2024 and 2025, prosumers provided essential daytime relief to an overstretched system, reducing the need for expensive "peaker" plants fueled by imported oil. By devaluing this contribution so drastically, NEPRA is sending a message that private investment in renewable energy is unwelcome. This policy will stall the momentum of the storage revolution, where we have already seen a surge of 1.25 GWh in battery imports as citizens try to find their own solutions to the energy crisis.

Furthermore, we believe that any regulation which forces a citizen to sell a commodity at a fraction of its market value to a state-backed monopoly (the DISCOs) is a violation of fair trade principles. Prosumers are not the cause of the "capacity payment" crisis; we are the ones providing a solution by generating power at the source. We urge NEPRA to maintain a fair and balanced exchange ratio that reflects the true cost of power and the value of green energy. We request the Authority to withdraw these lopsided amendments and protect the common man from being forced into an exploitative energy relationship.

Your Sincerely,

Adeel Musaddiq
W-1116 Phase III, DHA , Lahore

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 3:22 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: My Objections to the Proposed Changes in Distributed Generation Regulations

From: Jawad Musaddiq <jmusaddiq@gmail.com>
Sent: Tuesday, January 13, 2026 2:45 PM
To: registrar@nepra.org.pk
Subject: My Objections to the Proposed Changes in Distributed Generation Regulations

To, Dated 13-01-2026

The Registrar,

NEPRA Islamabad,

**Subject: Objections to the Proposed Changes in Distributed Generation
Regulations**

Respected Registrar,

We are writing to voice our serious reservations regarding the proposed overhaul of the net-metering framework. While the government encourages a transition to "Green Energy," these new regulations create significant barriers for the very citizens who are footing the bill for this transition.

The most pressing concern is the shift toward a Gross Metering style philosophy, which devalues the clean energy we contribute to the national pool. By proposing a buyback rate that is significantly lower than the cost of grid power, NEPRA is effectively creating a "solar tax" on households. This move ignores the reality that prosumers have saved the government billions by reducing the need for expensive furnace oil and LNG imports during peak daylight hours. Shifting the financial goalposts now will discourage future investment and kill the momentum of a sector that saw a record 1.25 GWh of battery storage integration in 2024.

Furthermore, the proposed fixed monthly charges for solar users are discriminatory. Solar prosumers already pay significant upfront costs, including a 10% GST on components as per the latest budget, and they continue to pay grid taxes on any units they consume from the DISCOs. Adding an extra "fixed fee" simply for being connected to the grid penalizes efficiency and environment-friendly behavior. It is illogical to punish citizens for reducing their carbon footprint when the state is struggling to meet international climate commitments and grid modernization.

Lastly, the lack of transparency in how these new rates were calculated is troubling. Consumers need a stable and predictable regulatory environment to justify long-term investments. We suggest that instead of curbing solar exports, NEPRA should introduce Time-of-Use (ToU) incentives that encourage consumers to export power during the grid's most stressed periods. We request the Authority to withdraw these amendments and engage in a meaningful dialogue with consumer protection groups to find a solution that does not sacrifice the interests of the common man to protect the margins of inefficient power companies.

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 3:22 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Presentation Against the Proposed 2025 Net-Billing Amendments / (Reference no. 16115230805902U / Jawad Musaddiq

From: Naveed Hussain (PA) <pa.slw@siddiqleather.com>
Sent: Tuesday, January 13, 2026 2:49 PM
To: registrar@nepra.org.pk
Cc: jawad@urbansole.com.pk
Subject: Presentation Against the Proposed 2025 Net-Billing Amendments / (Reference no. 16115230805902U / Jawad Musaddiq

Dated: 13 January , 206

To,
The Registrar,
NEPRA , Islamabad

Subject: Presentation Against the Proposed 2025 Net-Billing Amendments
(Reference no. 16115230805902U)

Respected Registrar,
السلام عليكم،

We are writing to formally submit our opposition to the proposed amendments regarding distributed generation. These regulations threaten to dismantle the progress made by thousands of Pakistani households and businesses who have utilized their own savings to solve the national energy crisis.

A primary concern is the proposed reduction of the buyback rate at a time when the cost of living and inflation remain high. By significantly lowering the compensation for surplus energy exported to the grid, NEPRA is effectively subsidizing inefficient power distribution companies (DISCOs) at the expense of private citizens. This policy shift ignores the fact that presumes have added massive decentralized capacity to the grid, surpassing 1.25 GWh of storage in 2024 alone, without a single rupee of government subsidy or sovereign guarantee.

Additionally, the new regulations create a "policy trap" for those who have already entered into long-term agreements. Any retrospective change to the tariff or the duration of existing licenses is a violation of the contractual trust between the state and its citizens. Such inconsistency creates a climate of uncertainty that will drive away future investors and halt the growth of the local solar industry. Instead of imposing restrictions, NEPRA should be facilitating the transition to "Smart Grids" where citizens are treated as partners in power generation, not as a source of extra revenue through new fixed charges.

Finally, we believe these amendments prioritize the protection of the traditional, expensive power model over the modern, clean energy future Pakistan desperately needs. We urge the Authority to reconsider these measures and instead focus on incentivizing the adoption of battery storage to manage peak loads. We request that NEPRA maintains the current one-to-one net metering benefits and protects the rights of the common man who is simply seeking relief from the highest electricity prices in the region.

Your Sincerely,

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 4:11 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Formal Objection to the Proposed Inequitable Energy Exchange Ratio

From: Mohammed Faheem <faheemreso@gmail.com>
Sent: Tuesday, January 13, 2026 4:01 PM
To: registrar@nepra.org.pk
Subject: Formal Objection to the Proposed Inequitable Energy Exchange Ratio

To: The Registrar, NEPRA
From: The Concerned Solar Prosumers of Pakistan
Date:
Subject: Formal Objection to the Proposed Inequitable Energy Exchange Ratio

Respected Registrar,

We are writing to express our profound concern regarding the proposed amendments to the net-billing regulations, which threaten to make the exchange of solar energy fundamentally unfair for the average citizen. The most alarming aspect of this proposal is the massive disparity it creates between the price at which we buy electricity and the price at which we are forced to sell it. Under the new rates, a consumer would effectively have to export 5 to 6 units of clean solar energy just to offset the cost of 1 unit consumed from the grid at night. This ratio is economically unjustifiable and places an unreasonable burden on households that have invested their own capital to reduce the national energy deficit.

This "5-for-1" exchange logic ignores the technical and economic value that distributed solar provides to the national grid. During the blistering summer months of 2024 and 2025, prosumers provided essential daytime relief to an overstretched system, reducing the need for expensive "peaker" plants fueled by imported oil. By devaluing this contribution so drastically, NEPRA is sending a message that private investment in renewable energy is unwelcome. This policy will stall the momentum of the storage revolution, where we have already seen a surge of 1.25 GWh in battery imports as citizens try to find their own solutions to the energy crisis.

Furthermore, we believe that any regulation which forces a citizen to sell a commodity at a fraction of its market value to a state-backed monopoly (the DISCOs) is a violation of fair trade principles. Prosumers are not the cause of the "capacity payment" crisis; we are the ones providing a solution by generating power at the source. We urge NEPRA to maintain a fair and balanced exchange ratio that reflects the true cost of power and the value of green energy. We request the Authority to withdraw these lopsided amendments and protect the common man from being forced into an exploitative energy relationship.

Sincerely,

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 4:11 PM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Formal Representation Against the Proposed 2025 Net-Billing Amendments

From: Mohammed Faheem <faheemreso@gmail.com>
Sent: Tuesday, January 13, 2026 4:05 PM
To: registrar@nepra.org.pk
Subject: Formal Representation Against the Proposed 2025 Net-Billing Amendments

To: The Registrar, NEPRA
From: The Concerned Electricity Consumers of Pakistan
Date: 13-01-2026
Subject: Formal Representation Against the Proposed 2025 Net-Billing Amendments

Respected Registrar,

We are writing to formally submit our opposition to the proposed amendments regarding distributed generation. These regulations threaten to dismantle the progress made by thousands of Pakistani households and businesses who have utilized their own savings to solve the national energy crisis.

A primary concern is the proposed reduction of the buyback rate at a time when the cost of living and inflation remain high. By significantly lowering the compensation for surplus energy exported to the grid, NEPRA is effectively subsidizing inefficient power distribution companies (DISCOs) at the expense of private citizens. This policy shift ignores the fact that prosumers have added massive decentralized capacity to the grid, surpassing 1.25 GWh of storage in 2024 alone, without a single rupee of government subsidy or sovereign guarantee.

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Shaïd UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:53 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

From: Solar Pakistan Net Metering on grid off grid <jamilriaz.pk@gmail.com>
Sent: Tuesday, January 13, 2026 4:44 PM
To: registrar@nepra.org.pk
Subject: Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

Wasim Anwar Bhinder Date : Friday, December 26, 2025

Registrar Nepra

Nepra Tower, Attaturk Avenue (East) G-5/1, Islamabad.

Subject : Formal Objection to the Draft Prosumer Regulations 2025 and Request to make amendment

Dear Sir,

Reference to your publication regarding Prosumer Regulation 2025 in the newspaper dated 15th December 2025, I am writing as a concerned citizen and existing solar Net metering consumer to formally record my reservations regarding the recently proposed "NEPRA Prosumer Regulations, 2025." While I appreciate the Authority's efforts to ensure grid stability and manage the growing distributed generation capacity, certain clauses in the draft are highly discouraging for renewable energy adoption in Pakistan.

1. Objection to the Change in Net Metering Mechanism

The shift from the existing Net Metering (unit-to-unit adjustment) to a Net Billing/Gross Metering model is a significant setback. By slashing the buyback rate to the National Average Energy Purchase Price (approx. Rs. 13/unit) while charging retail rates for imports (approx. Rs. 50-60/unit), the financial viability of solar investments for middle-class households is effectively destroyed.

The 2015 Regulations provided a fair incentive for citizens to invest their own capital to bridge the national energy gap. I request the Authority to revert to the original Net Metering mechanism to maintain consumer trust and continue the momentum of Green Energy.

2. Acceptance of Technical Constraints

I recognize that the rapid growth of solar generation poses technical challenges to the aging distribution infrastructure. In this regard, I find the following proposed changes to be reasonable and acceptable:

- Sanctioned Load Clause: Limiting the solar system capacity to 100% of the Sanctioned Load (instead of 150%) is a fair measure to ensure that the household's export does not exceed its authorized grid connection capacity.

- Transformer Capacity Clause: Restricting new connections once a transformer reaches 80% of its capacity is a logical technical safeguard to prevent local grid failures and protect equipment.

3. Re-evaluation of IPP Agreements and Capacity Payments

Beyond the technicalities of net metering, the primary driver behind the current energy crisis is the existence of unfair and unsustainable agreements with Independent Power Producers (IPPs). For decades, the national economy has been bled dry by "Take-or-Pay" clauses, where the government is forced to pay billions in "capacity charges" for electricity that is never actually produced or consumed. These dollar-indexed returns and sovereign guarantees have created an artificial tariff hike that is killing industrial productivity and pushing the common man below the poverty line. It is high time the government takes decisive steps to renegotiate or terminate these lopsided contracts, transitioning instead to a "Take-and-Pay" model. We cannot expect the public to subsidize the inefficiencies of the power sector and the excessive profits of a few influential groups while the rest of the country's economy remains in a state of paralysis.

4. Contribution to Reducing the National Fuel Import Bill

It is critical to acknowledge that Net-Metering consumers are not a burden, but a major contributor to the national exchequer. In FY 2024-25 alone, net-metered solar capacity in Pakistan crossed 5,800 MW, significantly reducing the need for expensive thermal power generation. By generating clean energy during peak daylight hours, consumers directly displace electricity that would otherwise be produced using imported FO (Furnace Oil) and RLNG (Regasified Liquefied Natural Gas). Recent data indicates that this decentralized generation has helped the country save billions in foreign exchange and even contributed to negative Fuel Charge Adjustments (FCA), providing relief to all grid consumers. Discouraging net metering now would essentially force the country back toward a heavy reliance on imported fossil fuels, further draining our precious foreign exchange reserves and worsening the trade deficit.

5. Environmental Survival and the Transition to Electric Vehicles (EVs)

Finally, it must be noted that Pakistan is already among the countries most vulnerable to climate change, with cities like Lahore and Multan suffering from hazardous smog levels every winter. Slowing down solar deployment by making it financially unviable will force a continued reliance on coal and oil-based power plants, which are primary contributors to particulate matter and poor air quality. Furthermore, the Government's own Electric Vehicle (EV) Policy depends entirely on the availability of economical and clean electricity. If net-metering benefits are withdrawn, the incentive for citizens to switch to EVs will vanish, as charging vehicles from an expensive and "dirty" national grid offers no relief. To achieve a "Clean Green Pakistan" and a smog-free future, the Authority must encourage solar energy as the backbone for an affordable EV charging infrastructure.

6. Recommendations

Instead of penalizing prosumers through reduced buyback rates, I urge NEPRA to:

- Maintain the unit-to-unit adjustment (Net Metering) as per the 2015 policy.
- Enforce strict compliance with Sanctioned Load and Transformer Loading limits to address grid stability.
- Re-evaluate expensive IPP Agreements
- Encourage Solar energy so that we can further reduce our import bill
- Wisely facilitate solar energy consumers to cater to escalating environmental challenges, ensuring that clean energy remains the primary tool for national growth rather than a casualty of regulatory shifts.

The proposed 2025 regulations, in their current form, will stall Pakistan's progress toward its renewable energy targets and increase the burden on already struggling consumers. I hope the Authority will consider these points during the public consultation process.

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Wednesday, 14 January, 2026 10:54 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Concerns Regarding NEPRA New Net Billing Policy

From: Muhammad Irfan <irfanshabbir352@gmail.com>
Sent: Tuesday, January 13, 2026 6:29 PM
To: registrar@nepra.org.pk
Subject: Concerns Regarding NEPRA New Net Billing Policy

The reduced buyback rates make solar investments financially unattractive for consumers.
Sudden policy changes undermine public trust and investor confidence in the renewable energy sector.
The increased payback period discourages new solar installations.
The policy negatively impacts local solar businesses and employment.
Discouraging net billing increases pressure on the national grid instead of providing relief.
The policy contradicts national goals for clean and sustainable energy.

Registrar

From: Almas malik <almas@unboxed.pk>
Sent: Monday, January 12, 2026 11:18 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad,

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Almas Fatima

1343 , st 47 B , Ali block bahria town phase 8 Rawalpindi

Best Regards,

REGISTRAR OFFICE
Diary No: 843
Date: 14.1.26

Forwarded please:

☒ For nec. action ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Legal)

For kind information, please,

✓ Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

14.01.26

15-01-26



3

BRANDING & DIGITAL MARKETING

Almas Fatima | Head of SMM, Unboxed Marketing

Cell: 00923335733375

Unboxed Marketing | Office 27, 3rd Floor, Pakland City Center, I-8 Markaz, Islamabad, Pakistan

Email: almas@unboxed.pk, **Website:** www.unboxed.pk

Chairman NEPRA

From: secretary <secretary@mowr.gov.pk.mail-govt.net>
Sent: Friday, January 9, 2026 8:30 PM
To: GG-AN
Subject: Audit report December 2025 and Preparation Grant for Building Environmental and Social (E&S) Capacity in Hydropower Development in Pakistan
Attachments: Preparation Grant.pdf; Audit Report Dec 2025.pdf

Enclosed please find attachment regarding Audit report December 2025 of Pakistan Water and Power Development Authority (Hydroelectric - Neptra regulated Business) and Preparation Grant for Building Environmental and Social (E&S) Capacity in Hydropower Development in Pakistan.

Sd/-
Syed Ali Murtaza
Secretary, Water Resources
051-9244603
secretary@mowr.gov.pk

REGISTRAR OFFICE
Diary No. 852
Date: 14.1.26

Registrar

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<input type="checkbox"/> SLA	<input type="checkbox"/> DG (IT)
<input checked="" type="checkbox"/> Capital Expend.	<input type="checkbox"/> Consultation

For kind information, please.

✓ Chairman ✓ M (Tech)
✓ M (Law) ✓ M (Dev)

14.01.26

NEPRA

Accounting Department

Diary No. 390

Date: 15-01-26

CHAIRMAN
DY No. 334
Date: 12-01-26

Registrar

From: Ameen Sharif <ameen_sharif@yahoo.com>
Sent: Sunday, January 11, 2026 6:22 PM
To: registrar@nepra.org.pk
Subject: Comments on Draft Prosumer Regulations 2025
Attachments: Comments on Draft NEPRA Prosumer Regulation 2025.pdf

Importance: High

Asslam-o-Alekum.

Respected Registrar NEPRA,
Please find comments on draft Prosumer Regulations 2025 attached with this email for your kind perusal.

Acknowledgment is kindly requested.

Best Regards
Ameen Sharif
0321-2437177

REGISTRAR OFFICE
Draft No: 835
Date: 14.1.26

Forwarded please:

☒ For rec. action ☐ For information

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/UCM)

For kind information, please,

✓ 1. Chairman 2. M (Tech)
✓ 3. M (Law) 4. M (Dev)

14-01-26

✓

✓

NEPRA
Licensing Department
Draft No: 389
Date: 15-01-26

House No 88, Road A
Phase 5, Bahria Town,
Islamabad
11 Jan 2026

To: The Registrar,
National Electric Power Regulatory Authority (NEPRA)

Subject: Comments on Draft NEPRA (Prosumer) Regulations, 2025 — with proposed amendments and supporting references

Respected Registrar NEPRA, Asslam-o-Alekum

With reference to the Draft *National Electric Power Regulatory Authority (Prosumer) Regulations, 2025*, I submit the following point-wise comments for kind consideration.

1) Clause 2(h) — Definition of “Billing cycle”

Draft: “billing cycle” means energy recorded by the meters in a period of **thirty days**.

Comment: DISCO billing practice is normally aligned to **calendar months**, which vary between **28–31 days**. Fixing “30 days” can create inconsistencies in monthly reconciliation (especially February and 31-day months), and may complicate settlement of exported energy credits and billing disputes.

Suggested wording:

“Billing cycle means a monthly billing period aligned with the licensee’s meter reading / billing schedule (calendar month basis), and may vary from 28 to 31 days.”

2) Clause 2(i) and 2(j) — Technology scope of “Distributed generation facility / distributed generation”

Draft limits DG technologies to: solar, wind or biogas only.

Comment: Pakistan’s **Alternative & Renewable Energy (ARE) Policy 2019 (Gazette Notified)** recognizes a wider range of ARE technologies including **geothermal** and **ocean/tidal wave energy**, among others. (ppib.gov.pk)

To keep the prosumer framework technology-neutral and future-proof, DG definitions should not unnecessarily exclude other qualifying renewable technologies.

Suggested amendment (minimum): add **geothermal** and **ocean/tidal wave (marine)** energy to 2(i) and 2(j). (Or reference the ARE Policy 2019 scope so the definition automatically remains up-to-date.) (ppib.gov.pk)

3) Clause 3(2) — Capacity cap vs sanctioned load

Draft: DG capacity “shall not exceed the sanctioned load...”, and “the Authority may revise... **at any time**.”

(a) Allow practical PV sizing up to 1.5× sanctioned load (with export protection)

Comment: For solar PV, nameplate capacity is rated under standardized conditions; actual output varies significantly with irradiance, temperature, and sun angle across the day. A strict “DG ≤ sanctioned load” can force unnecessary under sizing and reduce self-consumption potential.

Suggested approach (grid-safe):

Allow **installed PV capacity up to 1.5× sanctioned load**, while limiting **AC export** to sanctioned load through inverter settings / export limiting, where required by the licensee. This supports better daytime matching and energy yield without increasing grid injection risk.

(b) Improve regulatory certainty on “revise... at any time”

Comment: “At any time” creates investment uncertainty.

Suggested safeguard: Any revision should be prospective, with published methodology, stakeholder consultation, and a clear effective date (e.g., applicable only to new applications after notice).

4) Clause 14 — Net Billing (export credited at NAEPP) and its system-wide implications

Draft: Net billing; export energy to be billed/credited at **national average energy purchase price (NAEPP)**. Also, NEPRA may revise the export rate during the agreement term.

(a) Concern: Net billing at NAEPP may materially weaken prosumer economics

Comment: Export credit at NAEPP (instead of a higher reference such as NAPPP / avoided cost components) can significantly reduce payback viability for households and SMEs, thereby slowing distributed solar adoption and undermining policy objectives for indigenous clean energy.

(b) Root-cause issue: capacity payments and “Take-or-Pay” contracts already burden consumers (NEPRA’s own findings)

NEPRA’s State of Industry Reports repeatedly document that Pakistan’s power sector faces a major burden from surplus ‘Take-or-Pay’ capacity, where **capacity charges are guaranteed regardless of non-utilization**, meaning consumers pay for capacity even when it is not dispatched.

NEPRA quantified (FY 2021–22) that utilization of **30,303 MW** base-load ‘Take-or-Pay’ thermal plants remained **46%**, meaning consumers paid capacity charges for **54% unutilized capacity**. NEPRA also provided plant-level examples such as Hub Power with utilization **12.78%** and per-unit capacity payment **Rs. 18.94/kWh** (per kWh actually generated).

NEPRA further notes that surplus ‘Take-or-Pay’ capacity exacerbates circular debt and even “hinders the development of renewable energy sources,” discouraging investment in cleaner alternatives.

Therefore: The primary structural pressure on tariffs and the economy is strongly linked to fixed contractual capacity obligations and underutilization. Reducing prosumer export credit alone may not address this underlying cost driver.

(c) Circular debt pressure is macro-critical (NEPRA + IMF figures)

NEPRA reports power-sector circular debt **Rs. 2,393.37 billion** as of **June 30, 2024**, and shows payables to IPPs/GENCOs in the circular debt structure (Table 42).

IMF reports the **stock** of power sector circular debt at **PRs 2,530 billion (2.2% of GDP)** by end-February 2025. ([IMF](#))

(d) Suggested solution: a balanced design that protects non-prosumers without killing rooftop solar

Instead of a sharp shift to low export valuation, NEPRA may consider a balanced structure, for example:

1. retain predictable export valuation for small prosumers for example 25KW or lesser, or apply a phased transition; and
2. publish a clear method and schedule for any rate revisions (Clause 14(3)) to protect regulatory certainty.

5) Clause 21 — Savings & Repeal: transition and “grandfathering”

The draft repeals the 2015 net metering regulations and provides transitional billing rules, including that existing valid agreements remain billed at **national average power purchase price (NAPPP) till expiry**, while future renewals move to **NAEPP**.

Suggestion: Strengthen clarity and investor confidence by explicitly stating that:

- executed agreements remain protected until expiry as already provided, and
- any changeover for renewals is implemented with clear advance notice and predictable methodology.

6) Transparency and governance: reported concerns and need for audits / disclosure (submitted as “reports and calls”, not as findings)

Given the magnitude of capacity-payment burdens documented by NEPRA, it is in the public interest to ensure maximum transparency in contract structures and cost components. Media reports have cited a 2020 committee report alleging irregularities and recommending forensic audits; the same reports note lack of follow-through. ([Business Recorder](#))

Additionally, parliamentary oversight discussions have called for forensic audits and greater transparency of IPP contracts and capacity charges. ([Business Recorder](#))

Request: NEPRA may consider strengthening disclosure requirements and coordinating with relevant institutions to ensure transparent auditability (including beneficial ownership disclosures and conflict-management safeguards), so that public confidence in tariff outcomes improves.

Closing

NEPRA’s own reporting shows that “Take-or-Pay” surplus and underutilization can impose large capacity-payment burdens and discourage renewables.

I respectfully request that prosumer rules be designed to protect non-prosumers through transparent fixed-cost recovery while sustaining rooftop solar adoption and providing predictable, bankable regulatory signals.

Thank you for your consideration.

Respectfully,

Ameen Sharif

CNIC: 42301-0754051-7

Phone: 0321-2437177

Registrar

From: Muhammad Adeel Ashraf <adeelsindhu114@gmail.com>
Sent: Monday, January 12, 2026 4:57 AM
To: IHUSSAIN@nepra.org.pk; Registrar@nepra.org.pk; sapm@moip.gov.pk; pro@moip.gov.pk; secretary@moip.gov.pk; invest@sifc.gov.pk
Cc: headoffice@reap.com.pk; info@reap.com.pk; info@pakistansolarassociation.org; info@reap.pk; Srfarooque@nepra.org.pk; info@neeca.gov.pk
Subject: Formal Objection to Proposed Net Billing Policy & Request for Strategic Reconsideration with public hearing
Attachments: Objecting the NetMetering policy with This visionary approach.pdf; Vision 2040 Pakistan's Energy Revolution.pdf; Final VISION 2040 From Energy Bankruptcy to Industrial Dominance.pdf

REGISTRAR OFFICE
Diary No: 836
Date: 14.1.26

Dear Mr. Imtiaz Baloch, Registrar-NEPRA & Other Relevant Officials,

I hope this message finds you well.

I am writing to formally record my objection to the proposed changes in the Net Billing framework and to respectfully request NEPRA's reconsideration of the policy direction currently under discussion.

This objection is not made in defence of any single stakeholder group, but in the broader national interest of grid stability, industrial competitiveness, and long-term energy solvency.

Core Concern

Pakistan does not face an energy generation shortage. It faces a **storage, optimisation, and governance shortfall**. The proposed Net Billing revisions attempt to solve a structural problem by penalising distributed solar generation, which risks accelerating outcomes that are counter-productive for the grid and the economy.

Lowering buy back rates and tightening Net Billing will not preserve the grid. Instead, it will:

- Accelerate **grid defection**, particularly among high-consumption and financially capable users
- Push households and SMEs toward **private battery imports**, creating significant foreign exchange leakage
- Reduce daytime demand further, **increasing per-unit capacity costs** on remaining consumers
- Increase safety risks through millions of unmonitored, poorly maintained home battery systems

In effect, the policy risks repeating past mistakes where defensive regulation delays—but does not prevent—systemic stress.

Strategic Observation

Solar generation in Pakistan has already been financed by private capital. The grid's challenge is not solar penetration, but its inability to **harvest, store, and optimise low-cost daytime energy**.

Energy production is comparatively easy.

Energy storage and dispatch are the real constraints.

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

14-01-26

Attempting to “fight the sun” through restrictive Net Billing will only lead to higher tariffs, deeper circular debt pressure, and industrial contraction. Capturing the sun—through proper system-level storage and demand growth—offers the opposite outcome.

Recommended Policy Pivot (Summary)

I respectfully urge NEPRA, in coordination with the Ministry of Energy and SIFC, to consider the following immediate steps:

1. Pause aggressive Net Billing roll-out and tariff suppression mechanisms
2. Initiate a **utility-scale BESS pilot (5 GWh)** at key grid nodes
3. Encourage DISCOs to evolve into **energy optimisation and solar maintenance entities**
4. Fast-track digital solar onboarding and real-time visibility rather than restriction
5. Align power policy with industrial, trade, and export competitiveness objectives

This approach allows:

- Dilution of legacy capacity payments through **demand growth**, not consumer penalties
- Reduction in FX outflows by avoiding mass home-battery imports
- Restoration of industrial power tariffs to competitive regional levels
- Improved grid stability without litigation or abrupt contractual disruption

Industry Alignment

It is important to note that concerns similar to those outlined above are being raised across the ecosystem, including by large technology and storage players such as **Nigbo Green**, as well as by members within Pakistan’s renewable energy community. There is broad agreement that the current trajectory risks undermining both investor confidence and grid integrity.

Closing

This communication is made in the spirit of constructive engagement. NEPRA has historically played a pivotal role in balancing consumer protection with system sustainability. I firmly believe that with timely recalibration, Pakistan can transition from an energy-constrained economy to a low-cost, solar-powered industrial hub.

I would welcome the opportunity to present this perspective in a formal consultation or technical session, should NEPRA deem it useful.

Thank you for your time and consideration.

Yours sincerely,--

Muhammad Adeel Ashraf

Founder | Director | CEO | Entrepreneur | Analyst

Smart Pakistan / Sync Solar / Saint Solis Motors / Compare-EV / British Pathway

<https://adeelashraf.com> | UK+44 742 950 3889 | PK+92 345 770 6422



BA, Enterprise Management | University of Birmingham, UK.

MSC, Strategic Marketing & Consulting | University of Birmingham, UK.

MBA, Global Risk Management | LondonMet, UK.

Chartered Manager | CMI - Pearson Level 7 Strategic Management and Leadership, UK.

Executive Diploma in Global Business | Said Business School | University of Oxford, UK.

	
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Registrar

From: Muhammad Ali <aliali72@gmail.com>
Sent: Monday, January 12, 2026 11:08 AM
To: registrar@nepra.org.pk
Subject: Objection to the Government's proposed Net Billing Policy.

The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad, Pakistan

Respected Conocen Officer,

I write to register my strong objection to the Government's proposed Net Billing Policy as it applies to existing Net Metering consumers.

The proposed policy replaces the current Net Metering framework with a Net Billing mechanism that reduces the purchase rate for surplus electricity to PKR 27 per unit for existing consumers. This change forces prosumers to pay additional costs on off-peak units they generate, directly undermining the financial viability of solar investments made in good faith under NEPRA-approved Net Metering regulations.

Thousands of consumers installed solar systems based on approved payback periods, long-term financial planning, and clear government assurances promoting renewable energy. Applying this policy retrospectively is inequitable, violates legitimate expectations, and severely damages investor confidence in Pakistan's renewable energy sector.

The public hearing process for this policy allowed limited consumer participation, falling short of the transparency and inclusivity required for a policy of such significance.

If implemented, the policy will penalize early adopters, discourage future renewable investment, increase financial pressure on middle-income households, erode regulatory credibility, and conflict with national sustainability and climate objectives.

Accordingly, I strongly urge NEPRA to:

1. Exempt all existing Net Metering consumers from the proposed Net Billing Policy
2. Apply any revised framework only to future applicants, with a reasonable transition period
3. Conduct fresh, transparent public hearings with meaningful consumer participation
4. Publicly disclose the financial and economic justification for the proposed rates

I urge NEPRA to reconsider this policy in the broader national interest and to protect consumers who acted in full compliance with existing laws and regulations.

Thank You With Profound Regards.

Muhammad Ali
ConSumer # 1142070594
Contact Mob:- 0333 5102212

Forwarded please:

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For kind information, please:

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> 2. M (Tech)
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14-01-26

NEPRA
Planning Department
Copy No. 387
Date: 15-01-26

Chairman NEPRA

From: SAMIE ELAHI <samie.elahi@alshirkat.com>
Sent: Monday, January 12, 2026 12:44 PM
To: cad@nepra.org.pk; Chairman@nepra.org.pk
Cc: imran.ali@alshirkat.com; a.khaliq@alshirkat.com; 'Danish Bhai'
Subject: Strong Objection to Proposed Net Billing Policy & Request to Protect Existing Net Metering Consumers

Respected Sir/Madam,

I am writing to formally register my *strong protest and objection* against the proposed *Net Billing Policy, which effectively ends the existing Net Metering framework and is reported to be implemented from **14 January 2026*.

This policy change is deeply concerning, especially its application to *existing net metering consumers* who made long-term investments in solar energy based on the assurances, regulations, and incentives provided under the current Net Metering Policy.

The drastic reduction in purchase rates—*Rs. 27 per unit for existing users and Rs. 11.5 per unit for new users*—will severely impact the financial viability of installed solar systems. Thousands of consumers invested in solar energy in good faith, often using personal savings or loans, with the understanding that the regulatory framework would remain stable for a reasonable period.

Applying the new Net Billing Policy to *existing licensees* is unjust, retroactive in effect, and discourages future investment in renewable energy. It undermines public trust in regulatory institutions and contradicts national goals related to clean energy, sustainability, and reduction of load on the national grid.

I respectfully request NEPRA to:

1. *Immediately exempt all existing net metering consumers* from the proposed Net Billing Policy.
2. Allow current users to continue under the original Net Metering terms for the lifetime of their installed systems.
3. Reconsider the purchase rate mechanism to ensure fairness and economic feasibility.
4. Conduct *transparent and inclusive public consultations* with meaningful consumer participation before implementation.

For your record, my K-Electric net metering accounts are listed below:

* *0400000922992*
* *0400025235884*
* *0400024532680*

I sincerely urge NEPRA to reconsider this policy in the public interest and protect the rights of existing consumers who supported Pakistan's renewable energy transition.

Thank you for your time and attention. I look forward to a fair and just resolution.

Yours faithfully,
Samie Elahi
(Citizen)

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (GTBCM)

For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input type="checkbox"/> 2. M (Tech)
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REGISTRAR OFFICE
Diary No. 857
Date: 14.1.26

14.01.26

CHAIRMAN
331

Dy No. 331
Date: 12-01-26

Chairman NEPRA

From: SAMIE ELAHI <samie.elahi@alshirkat.com>
Sent: Monday, January 12, 2026 3:25 PM
To: cad@nepra.org.pk; Chairman@nepra.org.pk
Cc: imran.ali@alshirkat.com; a.khaliq@alshirkat.com; 'Danish Bhai'
Subject: Strong Objection to Proposed Net Billing Policy & Request to Protect Existing Net Metering Consumers

Respected Sir/Madam,

Registrar

I am writing to formally register my ***strong protest and objection*** against the proposed ***Net Billing Policy**, which effectively ends the existing Net Metering framework and is reported to be implemented from ****14 January 2026***.

This policy change is deeply concerning, especially its application to ***existing net metering consumers*** who made long-term investments in solar energy based on the assurances, regulations, and incentives provided under the current Net Metering Policy.

The drastic reduction in purchase rates—***Rs. 27 per unit for existing users and Rs. 11.5 per unit for new users***—will severely impact the financial viability of installed solar systems. Thousands of consumers invested in solar energy in good faith, often using personal savings or loans, with the understanding that the regulatory framework would remain stable for a reasonable period.

Applying the new Net Billing Policy to ***existing licensees*** is unjust, retroactive in effect, and discourages future investment in renewable energy. It undermines public trust in regulatory institutions and contradicts national goals related to clean energy, sustainability, and reduction of load on the national grid.

I respectfully request NEPRA to:

1. ***Immediately exempt all existing net metering consumers*** from the proposed Net Billing Policy.
2. Allow current users to continue under the original Net Metering terms for the lifetime of their installed systems.
3. Reconsider the purchase rate mechanism to ensure fairness and economic feasibility.
4. Conduct ***transparent and inclusive public consultations*** with meaningful consumer participation before final implementation.

For your record, my K-Electric net metering accounts are listed below:

* *0400000922992*
* *0400025235884*
* *0400024532680*

I sincerely urge NEPRA to reconsider this policy in the public interest and protect the rights of existing consumers who supported Pakistan's renewable energy transition.

Thank you for your time and attention. I look forward to a fair and just resolution.

Yours faithfully,
Samie Elahi
(Citizen)

Forwarded please:

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (L.F)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Reg/M)

For kind information, please:

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

14-01-26

CHAIRMAN

Dy No. *332*
Date: *12-01-26*

REGISTRAR OFFICE
Diary No. *859*
Date: *14.1.26*

NEPRA
Licensing Department
Diary No. *384*
Date: *15-1-26*

Chairman NEPRA

From: Atif Zaheer <atif.zaheeroes@gmail.com>
Sent: Friday, January 9, 2026 8:24 AM
To: Chairman@nepra.org.pk
Subject: Net billing policy Not good for consumer

Dear Registrar NEPRA / Chairman NEPRA,

I am writing to express my strong objection and grave concern regarding NEPRA's decision to discontinue the Net Metering regime and replace it with the proposed Net Billing Policy effective 14 January 2026.

This decision is unjust, regressive, and damaging to consumer confidence. Existing Net Metering consumers invested substantial amounts in solar systems based on the officially notified policy and regulatory assurances provided by NEPRA itself. Applying a new policy to existing consumers amounts to retrospective penalization and is fundamentally unfair.

Furthermore, the proposed purchase rate of Rs. 11.5 per unit for new consumers makes residential and commercial solar investments economically unviable, directly contradicting national goals of renewable energy promotion, reduction in grid load, and energy affordability. Such a policy will discourage future solar adoption and harm Pakistan's energy transition.

It is also deeply concerning that the public hearing on this critical matter was conducted with restricted participation, depriving a large number of stakeholders of their right to be heard. This undermines transparency and raises serious questions about regulatory fairness.

I strongly urge NEPRA to:

Immediately withdraw or suspend the proposed Net Billing Policy

Fully protect and exempt existing Net Metering consumers from any change in regime

Conduct a transparent, inclusive, and nationwide consultation process with all stakeholders before finalizing any such policy

Failure to address these concerns will not only erode public trust in NEPRA but may also compel consumers to seek legal and constitutional remedies to protect their legitimate rights and investments.

This matter requires urgent reconsideration in the interest of consumers, renewable energy development, and regulatory credibility.

Forwarded please:

☒ For nec. action ☐ For Information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 860
Date: 14.1.26

CHAIRMAN
By No: 516
Date: 10-01-26

NEPRA
Accounting Department
Diary No: 383
Date: 15-1-26

Registrar

From: Muhammad Arif <energyjurists@gmail.com>
Sent: Sunday, January 11, 2026 2:15 PM
To: registrar@nepra.org.pk
Subject: Comments on Draft Prosumer Regulations, 2025 – Request for Reconsideration by the Authority

REGISTRAR OFFICE
Dy No: 834
14-01-26

Dear Sir,

I respectfully submit consumer, regulatory, and implementation concerns arising from the Draft Prosumer Regulations, 2025, and to request the Authority’s urgent reconsideration of the proposed framework in fulfilment of its statutory mandate under the NEPRA Act, 1997.

1. Economic Disincentive to Rooftop Solar

The proposed buy-back mechanism values exported solar electricity at approximately Rs. 11.30 per unit, while imported grid electricity is charged at around Rs. 61 per unit. This pricing structure requires more than five units of exported solar energy to offset the cost of one imported unit. Such a disparity renders rooftop solar commercially unviable, discourages future investment, and contradicts national policy objectives for renewable energy growth and distributed generation.

2. Existing Prosumers Facing Quasi-Retrospective Financial Penalty

A substantial number of existing prosumers invested under NEPRA-notified net-metering policies that provided a seven-year protection period. As this period approaches completion, the proposed regime risks imposing financial disadvantage on consumers who made investment decisions in reliance on regulatory assurances. This undermines principles of regulatory certainty and legitimate expectation, which are fundamental to maintaining investor confidence in regulated sectors.

3. BTPL-Specific Compliance Failures and Consumer Harm

BTPL has continued to operate without a valid distribution licence since October 2020. It has imposed unauthorized tariff adjustments, miscellaneous charges, and arbitrary deductions of exported solar units. Most critically, BTPL has been illegally deducting 30% of legitimately exported solar units from prosumer accounts without approval of NEPRA, without legal basis, and in direct violation of NEPRA’s notified net-metering framework and determinations.

Despite repeated consumer complaints and NEPRA determinations, enforcement action has remained inadequate. This has left affected consumers unprotected, caused direct financial harm, and weakened regulatory credibility. Any new prosumer regime introduced without enforceable compliance safeguards risks further enabling such abusive practices.

4. Regulatory and Legal Concerns

The proposed framework, in the absence of explicit enforcement mechanisms, exposes consumers to potential abuse by unlicensed or non-compliant operators. This undermines NEPRA’s statutory responsibility to regulate the sector, protect consumers, ensure fair market practices, and maintain public confidence in regulatory governance.

14-01-26

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Tech.)

For kind information, Please:

<input checked="" type="checkbox"/> Chairman	<input type="checkbox"/> 2. M (Tech)
<input checked="" type="checkbox"/> 3. M (Law)	<input checked="" type="checkbox"/> 4. M (DG)

NEPRA
Consumer Department
Dy No: 382
15-01-26

Pray

In view of the above, it is respectfully prayed that the Authority may be pleased to:

1. Strictly enforce NEPRA determinations and prohibit distribution companies from imposing self-devised deductions, unauthorized charges, or unilateral tariff adjustments.
2. Take immediate enforcement action against BTPL for illegal deduction of 30% exported solar units and continued operation without a valid licence.
3. Confirm that the seven-year protection period for existing prosumers is calculated from the actual date of meter installation and operationalization.
4. Ensure that the transition to any new prosumer regime does not impose retrospective or quasi-retrospective financial penalties on existing consumers.
5. Introduce explicit safeguards to prevent abuse by unlicensed or non-compliant operators, including strict compliance conditions prior to allowing participation in any revised prosumer framework.
6. Reassess the proposed buy-back pricing mechanism to ensure commercial viability of rooftop solar and alignment with national renewable energy policy objectives. The buy back rate should no way be less than the cost of purchase of electricity including average capacity charges.

WEW MAY KINDLY BE PROVIDED AN OPPORUTNITY TO PRESENT OUR CASE IN PERSON DURING THE AUTHORITY HEARINGS

Yours sincerely,

Muhammad Arif

692A, ROAD D, PHASE 3, BAHRIA TOWN, ISLAMABAD

0333 5191381

Registrar

From: bilal ashraf <bil.ashraf@yahoo.com>
Sent: Sunday, January 11, 2026 11:40 AM
To: registrar@nepra.org.pk
Subject: Public Comments on NEPA (Prosumer) Regulations 2025 - Ahmed Bilal Ashraf (Individual Household Prosumer)

Ahmed Bilal Ashraf

House 255-A, Street 17, F-10/2

Islamabad

Forwarded please

☒ For nec. action

☐ For information

☒ DG (Lic.)

☐ DG (Admin/HR)

☐ SA (M&E)

☐ DG (CAD)

☐ DG (Tech.)

☐ DG (AIC)

☐ ADG (Trd.)

☐ DG (Fin.)

☒ SLA

☐ Dir. (I.T)

☐ Consult (Tech.)

☐ Consult (c/REGM)

For kind information, please,

☒ 1. Chairman

☐ 2. M (Tech)

☒ 3. M (Law)

☒ 4. M (Dev)

REGISTRAR OFFICE
Diary No: 833
Date: 14.1.26

PUBLIC COMMENTS ON

NEPA (Prosumer) Regulations, 2025

Submitted by: An Individual Household Prosumer

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into **millions of rupees**, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering.

This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and
- converts a family investment into a high-risk gamble.

NEPRA

Licensing Department

Diary No: 381

Date: 15-01-26

Household solar systems are not speculative ventures; they are **long-term household infrastructure investments**. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

- breaks public trust,
- violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,
- discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

- households bear **all capital, maintenance, and compliance costs**,
- distribution companies can limit or curtail exports,
- yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

- the household carries all financial risk,
- the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are **not wealthy investors**. They are middle-income families trying to:

- protect themselves from rising electricity tariffs,
- reduce load-shedding exposure,
- contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

- how export rates were determined,
- whether savings from reduced fuel imports were considered,
- how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. **Protect Existing Household Prosumers**

All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.

2. **No Mid-Term Changes to Buy-Back Rates**

Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.

3. **Fair and Transparent Valuation**

Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.

4. **Clear Policy for Future Installations Only**

If changes are necessary, they should apply only to **future applicants**, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure **fairness, predictability, and protection for household prosumers** who invested in good faith.

Registrar

From: bilal ashraf <bil.ashraf@yahoo.com>
Sent: Sunday, January 11, 2026 11:38 AM
To: registrar@nepra.org.pk
Subject: Public Comments on NEPRA (Prosumer) Regulations 2025 - Waseem Ahmed Ashraf (Individual Household Prosumer)

Waseem Ahmed Ashraf

House 278, Street 7, F-10/3

Islamabad

Forwarded please:
☒ For new action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult. Tech.	<input type="checkbox"/> Consult. (ECON)

For kind information, please:
☒ Chairman 2. M (Tech)
☒ 3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 832
Date: 14.1.26

PUBLIC COMMENTS ON

NEPRA (Prosumer) Regulations, 2025

Submitted by: An Individual Household Prosumer

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into **millions of rupees**, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering.

This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and
- converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are **long-term household infrastructure investments**. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

- breaks public trust,
- violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,
- discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

- households bear **all capital, maintenance, and compliance costs**,
- distribution companies can limit or curtail exports,
- yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

- the household carries all financial risk,
- the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are **not wealthy investors**. They are middle-income families trying to:

- protect themselves from rising electricity tariffs,
- reduce load-shedding exposure,
- contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

- how export rates were determined,
- whether savings from reduced fuel imports were considered,
- how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. **Protect Existing Household Prosumers**

All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.

2. **No Mid-Term Changes to Buy-Back Rates**

Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.

3. **Fair and Transparent Valuation**

Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.

4. **Clear Policy for Future Installations Only**

If changes are necessary, they should apply only to **future applicants**, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure **fairness, predictability, and protection for household prosumers** who invested in good faith.

Registrar

From: M Saleem <msaleemawan@icloud.com>
Sent: Sunday, January 11, 2026 3:29 PM
To: registrar@nepra.org.pk
Subject: PROSUMER REGULATIONS, 2025

REGISTRAR OFFICE
File No: 231
Date: 14.01.26

The following suggestions are offered please :

One is Net metering, the other is Sanctioned Load. The difference between these two is that our basic investment, which is the source of obtaining electricity, is wasted. In net billing, whatever electricity is generated and if more is spent on imports, the prosumer will have to pay the bill at the highest rate, but if it is saved, the pre-determined amount will be received.

Second, Load Sanction WAPDA's electricity is a Constant Factor, but this will not be the case with solar, it will remain Variable. In the morning and evening or in bad weather, there will be no sunlight or at night, the load will not be constant and in this case there will be a loss.

Third, if a two-way meter is installed, then WAPDA or the relevant disco should pay its cost and no changes should be made to it that will burden the consumer.

If the situation in the Middle East is to be understood with understanding and insight, it should also be kept in mind that there may be obstacles in the import of oil in the future.

And more than that, the current impasse in the Indus Waters Treaty also threatens to reduce the production of electricity from water resources. Keeping all these things in mind, solar electricity should be encouraged and such a policy should be developed so that the reduction in the process of generating electricity from oil and water can be met by solar.

Thank you.

Muhammad Saleem

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input checked="" type="checkbox"/> SI A	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (ECON)

For kind information, please.

☒ Chairman ☒ 2. M (Tech)
☒ 3. M (Law) ☒ 4. M (Dev)

14.01.26

NEPRA
Licensing Department
File No: 379
Date: 15-1-26

Registrar

From: M Omer Shoaib <email@omer.pk>
Sent: Tuesday, January 13, 2026 9:54 AM
To: registrar@nepra.org.pk
Subject: my concerns regarding proposed net metering amendments 2026.

REGISTRAR OFFICE
Diary No: 830
Date: 14.1.26

To: The Registrar, NEPRA
From: A Concerned Solar Prosumers of Pakistan
Date: 12/1/2026
Subject: Formal Objection to the Proposed Inequitable Energy Exchange Ratio

Respected Registrar,

I am writing to express my profound concern regarding the proposed amendments to the net-billing regulations, which threaten to make the exchange of solar energy fundamentally unfair for the average citizen. The most alarming aspect of this proposal is the massive disparity it creates between the price at which we buy electricity and the price at which we are forced to sell it. Under the new rates, a consumer would effectively have to export 5 to 6 units of clean solar energy just to offset the cost of 1 unit consumed from the grid at night. This ratio is economically unjustifiable and places an unreasonable burden on households that have invested their own capital to reduce the national energy deficit.

This "5-for-1" exchange logic ignores the technical and economic value that distributed solar provides to the national grid. During the blistering summer months of 2024 and 2025, prosumers provided essential daytime relief to an overstretched system, reducing the need for expensive "peaker" plants fueled by imported oil. By devaluing this contribution so drastically, NEPRA is sending a message that private investment in renewable energy is unwelcome. This policy will stall the momentum of the storage revolution, where we have already seen a surge of 1.25 GWh in battery imports as citizens try to find their own solutions to the energy crisis.

Furthermore, I believe that any regulation which forces a citizen to sell a commodity at a fraction of its market value to a state-backed monopoly (the DISCOs) is a violation of fair trade principles. Prosumers are not the cause of the "capacity payment" crisis; we are the ones providing a solution by generating power at the source. We urge NEPRA to maintain a fair and balanced exchange ratio that reflects the true cost of power and the value of green energy. We request the Authority to withdraw these lopsided amendments and protect the common man from being forced into an exploitative energy relationship.

Sincerely,

Muhammad Omer Shoaib

Forwarded please:

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (BOM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

14.01.26

[Signature]

NEPRA
378
15-1-26

To,

Dated 12-01-2026

The Registrar,

NEPRA Islamabad.

Subject: **Representation Against the Proposed 2025 Net-Billing Amendments**

Respected Registrar,

We are writing to formally submit our opposition to the proposed amendments regarding distributed generation. These regulations threaten to dismantle the progress made by thousands of Pakistani households and businesses who have utilized their own savings to solve the national energy crisis.

A primary concern is the proposed reduction of the buyback rate at a time when the cost of living and inflation remain high. By significantly lowering the compensation for surplus energy exported to the grid, NEPRA is effectively subsidizing inefficient power distribution companies (DISCOs) at the expense of private citizens. This policy shift ignores the fact that prosumers have added massive decentralized capacity to the grid, surpassing 1.25 GWh of storage in 2024 alone, without a single rupee of government subsidy or sovereign guarantee.

Additionally, the new regulations create a "policy trap" for those who have already entered into long-term agreements. Any retrospective change to the tariff or the duration of existing licenses is a violation of the contractual trust between the state and its citizens. Such inconsistency creates a climate of uncertainty that will drive away future investors and halt the growth of the local solar industry. Instead of imposing restrictions, NEPRA should be facilitating the transition to "Smart Grids" where citizens are treated as partners in power generation, not as a source of extra revenue through new fixed charges.

Finally, we believe these amendments prioritize the protection of the traditional, expensive power model over the modern, clean energy future Pakistan desperately needs. We urge the Authority to reconsider these measures and instead focus on incentivizing the adoption of battery storage to manage peak loads. We request that NEPRA maintains the current one-to-one net metering benefits and protects the rights of the common man who is simply seeking relief from the highest electricity prices in the region.

Your Sincerely,

Asif Mahmood

Forwarded please:

☒ For reg. action

☐ For Information

☒ DG (Lic.)

☐ DG (Admin/HR)

☐ SA (M&E)

☐ DG (CAD)

☐ DG (Tech.)

☐ DG (AIC)

☐ ADG (Inf.)

☐ DG (Fin.)

☒ SLA

☐ Dir. (IT)

☐ Consult (Tech.)

☐ Consult (Admin)

For kind information, please.

1. Chairman 2. M (Tech)

3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 846
Date: 14.1.26

NEPRA
Licensing Department
Diary No: 376
Date: 15-1-26

To,

Dated 12-01-2026

The Registrar,

NEPRA Islamabad,

Subject: **Objections to the Proposed Changes in Distributed Generation Regulations**

Respected Registrar,

We are writing to voice our serious reservations regarding the proposed overhaul of the net-metering framework. While the government encourages a transition to "Green Energy," these new regulations create significant barriers for the very citizens who are footing the bill for this transition.

The most pressing concern is the shift toward a Gross Metering style philosophy, which devalues the clean energy we contribute to the national pool. By proposing a buyback rate that is significantly lower than the cost of grid power, NEPRA is effectively creating a "solar tax" on households. This move ignores the reality that prosumers have saved the government billions by reducing the need for expensive furnace oil and LNG imports during peak daylight hours. Shifting the financial goalposts now will discourage future investment and kill the momentum of a sector that saw a record 1.25 GWh of battery storage integration in 2024.

Furthermore, the proposed fixed monthly charges for solar users are discriminatory. Solar prosumers already pay significant upfront costs, including a 10% GST on components as per the latest budget, and they continue to pay grid taxes on any units they consume from the DISCOs. Adding an extra "fixed fee" simply for being connected to the grid penalizes efficiency and environment-friendly behavior. It is illogical to punish citizens for reducing their carbon footprint when the state is struggling to meet international climate commitments and grid modernization.

Lastly, the lack of transparency in how these new rates were calculated is troubling. Consumers need a stable and predictable regulatory environment to justify long-term investments. We suggest that instead of curbing solar exports, NEPRA should introduce Time-of-Use (ToU) incentives that encourage consumers to export power during the grid's most stressed periods. We request the Authority to withdraw these amendments and engage in a meaningful dialogue with consumer protection groups to find a solution that does not sacrifice the interests of the common man to protect the margins of inefficient power companies.

Yout Sincerely,

Asif mahmood

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (L&E)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Economic)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No. 845
Date 14.1.26

NEPRA

Director (Consumer)

375

15-1-26

Registrar

From: Saeed Siddiqui <saeedhussainsiddiqui@gmail.com>
Sent: Tuesday, January 13, 2026 8:54 AM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Saeed Hussain Siddiqui
House 1526, Street 37-A
Sector-E Phase-8
Bahria twon

Forwarded please:

<input checked="" type="checkbox"/> For rec. action	<input type="checkbox"/> For Information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> DG (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/RCM)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA

Licensing Department

Diary No. 374
Date 15-1-26

The Consumer Affairs Division
National Electric Power Regulatory Authority (NEPRA)
Islamabad

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Subject: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy

I am a registered Solar Net Metering consumer operating under a valid approval / license issued pursuant to the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. My particulars are provided below for official record:

Consumer Information:

Name: Uzma Aftab
Postal Address: House no 64, Street 15, Sector E, DHA 2, Islamabad
Distribution Company (DISCO): IESCO
Net Metering License No./ Reference No.: 12146152887804

REGISTRAR OFFICE
Diary No: 840
Date: 14.1.26

Through this submission, I hereby lodge a **formal complaint** under NEPRA's Consumer Affairs framework against the recently notified **Solar Net Metering / Net Billing Policy**, on the following legal and regulatory grounds:

1. The new policy adversely affects existing net metering consumers who made capital investments based on the earlier notified regulations, approved tariffs, and legally executed agreements.
2. The retrospective or altered application of revised billing mechanisms undermines the principle of regulatory certainty and legitimate consumer expectation.
3. The policy materially changes the financial and commercial terms under which net metering licenses were granted, without adequate consumer consultation or transitional protection.
4. The revised framework discourages distributed generation and contradicts the objectives of renewable energy promotion, consumer protection, and sustainable power sector development.

It is respectfully submitted that all existing net metering consumers entered into binding agreements in good faith, relying on the continuity and stability of NEPRA's approved regulatory regime. Any unilateral modification impacting existing license holders raises serious consumer protection and regulatory compliance concerns.

Relief Sought:

In view of the above, I respectfully request NEPRA to:

- a) Safeguard the rights of existing net metering consumers by exempting them from the application of the new policy;
- b) Review the notified policy through due stakeholder consultation in accordance with best regulatory practices; and

Forwarded please:

<input checked="" type="checkbox"/> For reg. action	<input type="checkbox"/> For information
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<input type="checkbox"/> PSA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Inf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (L.I.)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Policy)

For kind information, please.

<input checked="" type="checkbox"/> 1. Chairman	<input checked="" type="checkbox"/> 2. M (Tech)
<input checked="" type="checkbox"/> 3. M (Law)	<input checked="" type="checkbox"/> 4. M (Dev)

14.01.26

NEPRA
Licensing Department
Diary No: 373
Date: 15-1-26

- c) Ensure that any future regulatory changes are prospective in nature and compliant with consumer protection principles.

I request that this complaint be registered, acknowledged, and processed under NEPRA Consumer Affairs procedures, and I may be informed of the outcome accordingly.

Yours sincerely,

Name: Uzma Aftab

Date: 12/01/2026

Letter to NEPRA Regarding Proposed Solar & Net-Metering Policy

To

The Registrar

National Electric Power Regulatory Authority (NEPRA)

Islamabad, Pakistan

Subject:

Concerns and Suggestions on the Implementation of the New Net Metering Policy

Respected Sir,

I am writing to express my concerns regarding the proposed changes to the solar and net-metering policy and their possible impact on solar businesses and consumers in Pakistan.

Over the past few years, the solar sector has grown rapidly, creating employment for engineers, technicians, electricians, and small businesses. Sudden or restrictive policy changes—especially related to net-metering rates or procedures—may lead to reduced installations, financial losses for small businesses, job insecurity, and lower investor confidence.

For the general public, solar energy has become an affordable solution against high electricity tariffs and load-shedding. Any imbalance in the new policy may increase the payback period of solar systems and discourage middle-income households from adopting renewable energy.

I respectfully request NEPRA to consider:

- Gradual implementation of any policy changes
- Consultation with industry stakeholders
- Continued support for residential and small commercial solar users

A balanced and stable policy will help protect existing investments while promoting clean energy, employment, and energy independence for Pakistan.

Thank you for your time and consideration.

Yours sincerely,

Muhammad Irfan

From SiSUN ELECTRIC

m.irfan@sisunelectric.com

Forwarded please:

☒ For rec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trd.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/COM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 881
Date: 14.1.26

NEPRA
Licensing Department
Diary No: 372
Date: 15-1-26

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 10:25 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Public Comments on NEPRA (Prosumer) Regulations 2025 - Ahmed Bilal Ashraf (Individual Household Prosumer)

From: bilal ashraf <bil.ashraf@yahoo.com>
Sent: Sunday, January 11, 2026 11:40 AM
To: registrar@nepra.org.pk
Subject: Public Comments on NEPRA (Prosumer) Regulations 2025 - Ahmed Bilal Ashraf (Individual Household Prosumer)

Ahmed Bilal Ashraf

House 255-A, Street 17, F-10/2

Islamabad

PUBLIC COMMENTS ON

NEPRA (Prosumer) Regulations, 2025
Submitted by: An Individual Household Prosumer

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into **millions of rupees**, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering.

This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and
- converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are **long-term household infrastructure investments**. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

- breaks public trust,
- violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,
- discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

- households bear **all capital, maintenance, and compliance costs**,
- distribution companies can limit or curtail exports,
- yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

- the household carries all financial risk,
- the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are **not wealthy investors**. They are middle-income families trying to:

- • • protect themselves from rising electricity tariffs,
- reduce load-shedding exposure,
- contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

- how export rates were determined,
- whether savings from reduced fuel imports were considered,
- how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. **Protect Existing Household Prosumers**
All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.
2. **No Mid-Term Changes to Buy-Back Rates**
Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.
3. **Fair and Transparent Valuation**
Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.
4. **Clear Policy for Future Installations Only**
If changes are necessary, they should apply only to **future applicants**, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure **fairness, predictability, and protection for household prosumers** who invested in good faith.

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 10:25 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: PROSUMER REGULATIONS, 2025

-----Original Message-----

From: M Saleem <msaleemawan@icloud.com>
Sent: Sunday, January 11, 2026 3:29 PM
To: registrar@nepra.org.pk
Subject: PROSUMER REGULATIONS, 2025

The following suggestions are offered please :

One is Net metering, the other is Sanctioned Load. The difference between these two is that our basic investment, which is the source of obtaining electricity, is wasted. In net billing, whatever electricity is generated and if more is spent on imports, the prosumer will have to pay the bill at the highest rate, but if it is saved, the pre-determined amount will be received.

Second, Load Sanction WAPDA's electricity is a Constant Factor, but this will not be the case with solar, it will remain Variable. In the morning and evening or in bad weather, there will be no sunlight or at night, the load will not be constant and in this case there will be a loss.

Third, if a two-way meter is installed, then WAPDA or the relevant disco should pay its cost and no changes should be made to it that will burden the consumer.

If the situation in the Middle East is to be understood with understanding and insight, it should also be kept in mind that there may be obstacles in the import of oil in the future.

And more than that, the current impasse in the Indus Waters Treaty also threatens to reduce the production of electricity from water resources. Keeping all these things in mind, solar electricity should be encouraged and such a policy should be developed so that the reduction in the process of generating electricity from oil and water can be met by solar.

Thank you.
Muhammad Saleem

The Consumer Affairs Division
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Subject: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy

I am a registered Solar Net Metering consumer operating under a valid approval / license issued pursuant to the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. My particulars are provided below for official record:

Consumer Information:

Name: Uzma Aftab
Postal Address: House no 64, Street 15, Sector E, DHA 2, Islamabad
Distribution Company (DISCO): IESCO
Net Metering License No./ Reference No.: 12146152887804

Through this submission, I hereby lodge a **formal complaint** under NEPRA's Consumer Affairs framework against the recently notified **Solar Net Metering / Net Billing Policy**, on the following legal and regulatory grounds:

1. The new policy adversely affects existing net metering consumers who made capital investments based on the earlier notified regulations, approved tariffs, and legally executed agreements.
2. The retrospective or altered application of revised billing mechanisms undermines the principle of regulatory certainty and legitimate consumer expectation.
3. The policy materially changes the financial and commercial terms under which net metering licenses were granted, without adequate consumer consultation or transitional protection.
4. The revised framework discourages distributed generation and contradicts the objectives of renewable energy promotion, consumer protection, and sustainable power sector development.

It is respectfully submitted that all existing net metering consumers entered into binding agreements in good faith, relying on the continuity and stability of NEPRA's approved regulatory regime. Any unilateral modification impacting existing license holders raises serious consumer protection and regulatory compliance concerns.

Relief Sought:

In view of the above, I respectfully request NEPRA to:

- a) Safeguard the rights of existing net metering consumers by exempting them from the application of the new policy;
- b) Review the notified policy through due stakeholder consultation in accordance with best regulatory practices; and

- c) Ensure that any future regulatory changes are prospective in nature and compliant with consumer protection principles.

I request that this complaint be registered, acknowledged, and processed under NEPRA Consumer Affairs procedures, and I may be informed of the outcome accordingly.

Yours sincerely,

Name: Uzma Aftab

Date: 12/01/2026

To,

Dated 12-01-2026

The Registrar,

NEPRA Islamabad.

Subject: Representation Against the Proposed 2025 Net-Billing Amendments

Respected Registrar,

We are writing to formally submit our opposition to the proposed amendments regarding distributed generation. These regulations threaten to dismantle the progress made by thousands of Pakistani households and businesses who have utilized their own savings to solve the national energy crisis.

A primary concern is the proposed reduction of the buyback rate at a time when the cost of living and inflation remain high. By significantly lowering the compensation for surplus energy exported to the grid, NEPRA is effectively subsidizing inefficient power distribution companies (DISCOs) at the expense of private citizens. This policy shift ignores the fact that prosumers have added massive decentralized capacity to the grid, surpassing 1.25 GWh of storage in 2024 alone, without a single rupee of government subsidy or sovereign guarantee.

Additionally, the new regulations create a "policy trap" for those who have already entered into long-term agreements. Any retrospective change to the tariff or the duration of existing licenses is a violation of the contractual trust between the state and its citizens. Such inconsistency creates a climate of uncertainty that will drive away future investors and halt the growth of the local solar industry. Instead of imposing restrictions, NEPRA should be facilitating the transition to "Smart Grids" where citizens are treated as partners in power generation, not as a source of extra revenue through new fixed charges.

Finally, we believe these amendments prioritize the protection of the traditional, expensive power model over the modern, clean energy future Pakistan desperately needs. We urge the Authority to reconsider these measures and instead focus on incentivizing the adoption of battery storage to manage peak loads. We request that NEPRA maintains the current one-to-one net metering benefits and protects the rights of the common man who is simply seeking relief from the highest electricity prices in the region.

Your Sincerely,

Asif Mahmood

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 10:46 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

From: Almas malik <almas@unboxed.pk>
Sent: Monday, January 12, 2026 11:18 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad,

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

“Misc.Charges” routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Almas Fatima

Shaid UR Rehman

From: Registrar <registrar@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 10:48 AM
To: Imtiaz Hussain Baloch; Ahmad Ibrahim
Subject: FW: my concerns regarding proposed net metering amendments 2026.

From: M Omer Shoaib <email@omer.pk>
Sent: Tuesday, January 13, 2026 9:54 AM
To: registrar@nepra.org.pk
Subject: my concerns regarding proposed net metering amendments 2026.

To: The Registrar, NEPRA
From: A Concerned Solar Prosumers of Pakistan
Date: 12/1/2026
Subject: Formal Objection to the Proposed Inequitable Energy Exchange Ratio

Respected Registrar,

I am writing to express my profound concern regarding the proposed amendments to the net-billing regulations, which threaten to make the exchange of solar energy fundamentally unfair for the average citizen. The most alarming aspect of this proposal is the massive disparity it creates between the price at which we buy electricity and the price at which we are forced to sell it. Under the new rates, a consumer would effectively have to export 5 to 6 units of clean solar energy just to offset the cost of 1 unit consumed from the grid at night. This ratio is economically unjustifiable and places an unreasonable burden on households that have invested their own capital to reduce the national energy deficit.

This "5-for-1" exchange logic ignores the technical and economic value that distributed solar provides to the national grid. During the blistering summer months of 2024 and 2025, prosumers provided essential daytime relief to an overstretched system, reducing the need for expensive "peaker" plants fueled by imported oil. By devaluing this contribution so drastically, NEPRA is sending a message that private investment in renewable energy is unwelcome. This policy will stall the momentum of the storage revolution, where we have already seen a surge of 1.25 GWh in battery imports as citizens try to find their own solutions to the energy crisis.

Furthermore, I believe that any regulation which forces a citizen to sell a commodity at a fraction of its market value to a state-backed monopoly (the DISCOs) is a violation of fair trade principles. Prosumers are not the cause of the "capacity payment" crisis; we are the ones providing a solution by generating power at the source. We urge NEPRA to maintain a fair and balanced exchange ratio that reflects the true cost of power and the value of green energy. We request the Authority to withdraw these lopsided amendments and protect the common man from being forced into an exploitative energy relationship.

Sincerely,

Muhammad Omer Shoaib

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 9:52 AM
To: Shahid Farooque
Subject: Fwd: Strong Objection to Proposed Net Billing Policy & Request to Protect Existing Net Metering Consumers

----- Original Message -----

Subject: Fwd: Strong Objection to Proposed Net Billing Policy & Request to Protect Existing Net Metering Consumers
Date: 2026-01-13 09:41
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Strong Objection to Proposed Net Billing Policy & Request to Protect Existing Net Metering Consumers
Date: 2026-01-12 12:44
From: "SAMIE ELAHI" <samie.elahi@alshirkat.com>
To: <cad@nepra.org.pk>, <Chairman@nepra.org.pk>
Copy: <imran.ali@alshirkat.com>, <a.khaliq@alshirkat.com>, "'Danish Bhai'" <danish@alshirkat.com>

Respected Sir/Madam,

I am writing to formally register my **strong protest and objection** against the proposed **Net Billing Policy*, which effectively ends the existing Net Metering framework and is reported to be implemented from ***14 January 2026**.

This policy change is deeply concerning, especially its application to **existing net metering consumers** who made long-term investments in solar energy based on the assurances, regulations, and incentives provided under the current Net Metering Policy.

The drastic reduction in purchase rates--**Rs. 27 per unit for existing users and Rs. 11.5 per unit for new users**--will severely impact the financial viability of installed solar systems. Thousands of consumers invested in solar energy in good faith, often using personal savings or loans, with the understanding that the regulatory framework would remain stable for a reasonable period.

Applying the new Net Billing Policy to **existing licensees** is unjust, retroactive in effect, and discourages future investment in renewable energy. It undermines public trust in regulatory institutions and contradicts national goals related to clean energy, sustainability, and reduction of load on the national grid.

I respectfully request NEPRA to:

1. **Immediately exempt all existing net metering consumers** from the proposed Net Billing Policy.
2. Allow current users to continue under the original Net Metering terms for the lifetime of their installed systems.
3. Reconsider the purchase rate mechanism to ensure fairness and economic feasibility.

4. Conduct *transparent and inclusive public consultations* with meaningful consumer participation before final implementation.

For your record, my K-Electric net metering accounts are listed below:

* *0400000922992*

* *0400025235884*

* *0400024532680*

I sincerely urge NEPRA to reconsider this policy in the public interest and protect the rights of existing consumers who supported Pakistan's renewable energy transition.

Thank you for your time and attention. I look forward to a fair and just resolution.

Yours faithfully,

Samie Elahi

(Citizen)

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Tuesday, 13 January, 2026 9:56 AM
To: Shahid Farooque
Subject: Fwd: Complaint Regarding Suspension of Net Metering and Pending Applications

----- Original Message -----

Subject: Fwd: Complaint Regarding Suspension of Net Metering and Pending Applications
Date: 2026-01-13 09:54
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: FW: Complaint Regarding Suspension of Net Metering and Pending Applications
Date: 2026-01-12 12:43
From: "Chairman NEPRA" <chairman@nepra.org.pk>
To: "CAD " <cad@nepra.org.pk>

Dear Sir,

Reference to trailing email regarding consumer complaint for your information and necessary action as per applicable SOPs.

Regards,

PA to Chairman

From: #saif_afridi <saifkhanafridi009@gmail.com>
Sent: Thursday, January 8, 2026 11:05 PM
To: Chairman@nepra.org.pk
Subject: Complaint Regarding Suspension of Net Metering and Pending Applications

Respected Sir/Madam,

I am writing to formally lodge a complaint regarding the sudden suspension of the net metering process and the complete halt in processing pending net metering cases.

It has been observed that new net metering approvals have been stopped, and applications that were already submitted and are pending at different stages have also not been processed further. This situation has caused serious concern and financial distress to consumers who have already invested heavily in solar energy systems based on the existing net metering policy.

Many applicants have completed all required documentation, inspections, and installations, yet their cases remain unresolved without any clear timeline or official communication. This lack of transparency and delay is discouraging the adoption of renewable energy and is adversely affecting public trust.

-
I respectfully request NEPRA to kindly look into this matter urgently, issue clear directions to the concerned DISCOs, and ensure that pending net metering applications are processed without further delay. Additionally, an official clarification regarding the future of net metering would be highly appreciated.

I shall be grateful for your prompt attention to this matter.

Your sincerely

M Safi ullah

03024008249

The Consumer Affairs Division
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Subject: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy

I am a registered Solar Net Metering consumer operating under a valid approval / license issued pursuant to the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. My particulars are provided below for official record:

Consumer Information:

Name: Uzma Aftab
Postal Address: House no 64, Street 15, Sector E, DHA 2, Islamabad
Distribution Company (DISCO): IESCO
Net Metering License No./ Reference No.: 12146152887804

Through this submission, I hereby lodge a **formal complaint** under NEPRA's Consumer Affairs framework against the recently notified **Solar Net Metering / Net Billing Policy**, on the following legal and regulatory grounds:

1. The new policy adversely affects existing net metering consumers who made capital investments based on the earlier notified regulations, approved tariffs, and legally executed agreements.
2. The retrospective or altered application of revised billing mechanisms undermines the principle of regulatory certainty and legitimate consumer expectation.
3. The policy materially changes the financial and commercial terms under which net metering licenses were granted, without adequate consumer consultation or transitional protection.
4. The revised framework discourages distributed generation and contradicts the objectives of renewable energy promotion, consumer protection, and sustainable power sector development.

It is respectfully submitted that all existing net metering consumers entered into binding agreements in good faith, relying on the continuity and stability of NEPRA's approved regulatory regime. Any unilateral modification impacting existing license holders raises serious consumer protection and regulatory compliance concerns.

Relief Sought:

In view of the above, I respectfully request NEPRA to:

- a) Safeguard the rights of existing net metering consumers by exempting them from the application of the new policy;
- b) Review the notified policy through due stakeholder consultation in accordance with best regulatory practices; and

- c) Ensure that any future regulatory changes are prospective in nature and compliant with consumer protection principles.

I request that this complaint be registered, acknowledged, and processed under NEPRA Consumer Affairs procedures, and I may be informed of the outcome accordingly.

Yours sincerely,

Name: Uzma Aftab

Date: 12/01/2026

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 4:19 PM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2026-01-09 12:33
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject:
Date: 2026-01-09 11:36
From: Muhammad Yaseen Khalid <muhammadyaseenkhalid@gmail.com>
To: cad@nepra.org.pk, Chairman@nepra.org.pk

Respected Chairman / Registrar NEPRA,

I am writing to formally register my strong objection to the proposed Net Billing Policy scheduled to take effect from 14 January 2026, as published on NEPRA's website.

This policy effectively ends net metering and applies retrospectively to existing licensees, which is deeply unfair and against the legitimate expectations of consumers who invested in solar systems under the existing Net Metering Regulations. These investments were made in good faith, based on long-term policy stability promised by the regulator. While the proposed purchase rate of Rs. 27/unit for existing users is noted, the overall shift from net metering to net billing will significantly reduce the economic viability of installed systems and undermine consumer confidence in future renewable energy initiatives.

I would like to highlight the following concerns:

Retrospective application of the policy to existing net metering consumers is unjust and should not be allowed. Limited and restricted public participation in the hearing process does not reflect transparent regulatory practice. Such abrupt policy changes discourage renewable energy adoption and private investment. The proposed rate of Rs. 11.5/unit for new consumers is unviable and will stall rooftop solar growth in Pakistan.

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 4:19 PM
To: Shahid Farooque
Subject: Fwd: Strong Objection Against New Net Billing Policy & Request to Protect Existing Net Metering Users

----- Original Message -----

Subject: Fwd: Strong Objection Against New Net Billing Policy & Request to Protect Existing Net Metering Users
Date: 2026-01-09 12:33
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Strong Objection Against New Net Billing Policy & Request to Protect Existing Net Metering Users
Date: 2026-01-09 11:38
From: Anosh Shaheen <anoshshaheen945@gmail.com>
To: cad@nepra.org.pk, Registrar@nepra.org.pk, Chairman@nepra.org.pk

Dear Chairman NEPRA / Registrar NEPRA,

Main NEPRA ki proposed Net Billing Policy (jo Net Metering ke khatmay ke liye 14 January 2026 se lagu ki ja rahi hai) ke khilaf apna sakht ehtijaj record karwana chahta hoon.

Yeh policy khas taur par existing net metering users ke liye bohat zyada na-insafi par mabni hai. Hazaron consumers ne solar systems par heavy investment sirf is liye ki kyun ke NEPRA ki approved Net Metering policy par bharosa tha. Ab is policy ko retrospectively change karna consumers ke trust aur regulatory commitment ke bilkul khilaf hai.

Proposed purchase rate — Rs. 27/unit existing users ke liye aur Rs. 11.5/unit new users ke liye — solar investment ko financially non-viable bana dega. Is se na sirf renewable energy ka process slow hoga balkay awam par mazeed financial burden bhi padega.

Is ke ilawa public hearing mein limited aur restricted participation ka amal bhi shaffafiyat par sawal uthata hai. Itni important policy ke liye wider public consultation zaroori thi.

Main NEPRA se pur-zor guzarish karta hoon ke:

1. Existing net metering consumers ko new Net Billing Policy se exempt kiya jaye.
2. Old licensees ke liye pehlay se approved terms aur rates ko system ki life tak barqarar rakha jaye.
3. Is policy ko broader public aur stakeholders se proper mashwaray ke baad dobara review kiya jaye.

Pakistan ko is waqt renewable energy ko promote karne ki zaroorat hai, discourage karne ki nahi. Umeed hai NEPRA public interest aur consumers ke haq mein is faislay par dobara ghour kare gi.

Shukriya.

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Friday, 9 January, 2026 4:20 PM
To: Shahid Farooque
Subject: Fwd: PROTEST: Objections to the Proposed Net Billing Policy and Retrospective Amendment of Net Metering Regulations

----- Original Message -----

Subject: Fwd: PROTEST: Objections to the Proposed Net Billing Policy and Retrospective Amendment of Net Metering Regulations
Date: 2026-01-09 14:33
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: PROTEST: Objections to the Proposed Net Billing Policy and Retrospective Amendment of Net Metering Regulations
Date: 2026-01-09 12:43
From: Tallha Ashraf <tallhaashraf313@gmail.com>
To: cad@nepra.org.pk, Registrar@nepra.org.pk, Chairman@nepra.org.pk

To,
The Worthy Chairman and Registrar,

I am writing to formally record my strongest possible protest and technical objections regarding the proposed transition from Net Metering to a Net Billing Policy, scheduled for implementation in January 2026.

This policy, as proposed, represents a severe breach of trust between the state and its citizens who have invested billions of rupees in renewable energy to alleviate the national energy crisis. My objections are based on the following critical points:

- 1. Violation of Contractual Integrity (Grandfathering):** Existing Net Metering users were issued 7-year licenses under the Distributed Generation and Net Metering Regulations 2015. Retrospectively changing the terms of these licenses to a "Net Billing" mechanism is a violation of the "vested rights" of consumers. The principle of Grandfathering must be upheld; any new policy should only apply to applicants who apply after the new notification date.
- 2. Financial Unviability of Renewable Investment:** The proposed buyback rates (Rs. 27 for old users and a staggering low Rs. 11.5 for new users) are completely divorced from the reality of the retail price of electricity (currently exceeding Rs. 60–70, including taxes). By devaluing exported units to such an extent, NEPRA is effectively penalizing citizens for producing clean energy and helping the national grid.
- 3. Contradiction of National Green Energy Goals:** At a time when the government of Pakistan aims to increase the share of renewable energy to 30% by 2030, this policy acts as a massive deterrent. It discourages the adoption of solar energy, forces consumers back toward expensive fossil-fuel-based grid power, and increases the circular debt by reducing the efficiency of the energy mix.

4. Lack of Transparent Public Consultation: It is highly concerning that the hearings for such a monumental shift were conducted with restricted participation. A policy that affects hundreds of thousands of households and businesses requires an open, inclusive, and transparent public debate.

Demand: I urge NEPRA to:

*

Please withdraw the proposed Net Billing Policy in its current form as soon as possible.

*

Guarantee Protection for all existing Net Metering license holders for the full duration of their 7-year agreements at the original 1:1 or prevailing unit-swap rates.

*

Re-evaluate Buyback Rates for new users to ensure they remain economically viable (linked to a percentage of the average basket price, rather than a fixed low rate).

The citizens of Pakistan have invested in solar energy as a solution to rising energy costs and instability. Turning this into a "Net Billing" trap will result in a complete loss of investor confidence in NEPRA's regulatory framework.

Yours sincerely,

Tallha Ashraf
Sabzazar, Lahore,
0300-5557725

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 12 January, 2026 12:02 PM
To: Shahid Farooque
Subject: Fwd: Complaint and Objection

----- Original Message -----

Subject: Fwd: Complaint and Objection
Date: 2026-01-12 09:55
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Complaint and Objection
Date: 2026-01-12 08:08
From: Irfan Ahmed <irfan.ahmed33@gmail.com>
To: Chairman@nepra.org.pk, cad@nepra.org.pk

Dear Chairman NEPRA,

I hope this message finds you well.

I am writing to formally lodge my complaint and strong objection to the proposed Net Billing Policy, which effectively ends the existing Net Metering mechanism and is planned to be implemented from 14 January 2026.

This policy has caused serious concern among existing and potential solar consumers across Pakistan.

Thousands of consumers invested heavily in solar power systems based on the assurance and framework of the approved Net Metering Policy.

Applying a new policy retrospectively to existing licensees is unfair, unjust, and damaging to consumer confidence.

My key concerns are as follows:

Existing net metering users are being forced into a new framework, despite having made long-term financial investments under the previous policy.

The significant reduction in the purchase (buyback) rate—especially for new users—will severely impact the economic viability of solar energy.

The consultation and hearing process appeared to have limited and restricted consumer participation, raising transparency concerns.

This policy discourages renewable energy adoption and contradicts national goals of promoting clean and affordable energy.

I respectfully request NEPRA to:

Exempt all existing net metering consumers from the proposed Net Billing Policy, and Allow them to continue under the original net metering terms for the validity of their licenses, or Reconsider the policy after conducting broader and meaningful stakeholder consultations.

I urge NEPRA, as an independent and consumer-protective regulator, to safeguard the interests of consumers and ensure fairness and regulatory consistency.

Thank you for your time and consideration. I sincerely hope NEPRA will revisit this decision in the larger public interest.

Your sincerely,

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 12 January, 2026 12:02 PM
To: Shahid Farooque
Subject: Fwd: Upcoming Solar policy

----- Original Message -----

Subject: Fwd: Upcoming Solar policy
Date: 2026-01-12 10:20
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Upcoming Solar policy
Date: 2026-01-10 22:53
From: Sohail Sheikh <sohailgtz@icloud.com>
To: cad@nepra.org.pk

Dear sir,

Please stop thinking of imposing new solar policy don't think Pakistani masses are fool. For we paid for normal meter then green meter now AMR. We strongly protest against new upcoming billing system, please obtain from pushing the masses to the wall before they come out in streets and drag you all in power I. The streets and road like Sri Lanka. There need to be an end to this oppression. You want to kill awam. !!!

Sohail A. Sheikh

Sent from my iPhone - The message might be short

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 12 January, 2026 12:02 PM
To: Shahid Farooque
Subject: Fwd: Serious Concern Regarding Proposed Change from Net Metering to Net Billing Policy

----- Original Message -----

Subject: Fwd: Serious Concern Regarding Proposed Change from Net Metering to Net Billing Policy
Date: 2026-01-12 10:22
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Serious Concern Regarding Proposed Change from Net Metering to Net Billing Policy
Date: 2026-01-10 18:34
From: Usman Rahi <usmanrahi.damco@gmail.com>
To:

Dear Sir/Madam,

I am writing to express my serious concern regarding the recent news about the proposed change in the net metering policy to a net billing policy. I am a new AMI meter user, and like thousands of other consumers, I have invested a substantial amount of money in installing a solar system. This investment was made after careful planning, and in many cases—including mine—it involved taking loans based on the long-term viability and assurances of the existing net metering policy.

It is deeply concerning that NEPRA is considering changes that would not only affect new applicants but also alter the terms for existing net metering consumers. Such a move would effectively change contracts after investments have already been made, which is unfair and financially damaging to consumers who acted in good faith.

Net billing, as proposed, is an anti-consumer policy. It is unjust that solar consumers are required to sell their surplus electricity to DISCOs at significantly lower rates, only to buy electricity back at nearly three times the price. This discourages clean energy adoption and places an additional financial burden on the general public.

As solar users, we are actively supporting the government by contributing to cleaner, cheaper, and environmentally friendly electricity generation. Unfortunately, instead of being encouraged, we feel penalized for producing clean and green energy.

I respectfully request NEPRA to reconsider this decision and continue with the net metering policy. Rather than burdening consumers further, the focus should be on reducing reliance on costly electricity from IPPs and investing in strengthening the national grid to effectively manage solar load. Across the world, governments promote and incentivize renewable energy—sadly, this proposed policy shift appears to move us in the opposite direction.

I urge you to protect the interests of consumers and support sustainable energy solutions by maintaining the net metering framework.

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 12 January, 2026 12:03 PM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2026-01-12 10:24
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject:
Date: 2026-01-10 07:25
From: Uzair Awan <uzairawan992@gmail.com>
To: cad@nepra.org.pk

We reject this new net metering policy. Please think for the people of Pakistan to promote green energy. Instead of facilitating this policy will discourage the new customers.

Regards

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 12 January, 2026 12:07 PM
To: Shahid Farooque
Subject: Fwd: Net billing

----- Original Message -----

Subject: Fwd: Net billing
Date: 2026-01-12 10:35
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net billing
Date: 2026-01-09 15:06
From: IRAMSHAKIR <iramshakir@yahoo.co.uk>
To: <cad@nepra.org.pk>

I am prof iram shakir kiani living in behria enclave and have met meter for the last 6 years ...I strongly resist and condemn the new net billing system being proposed ..I spent all my savings to get solar installed and now the new very consumer non friendly system is being suggested ..kindly record by strong objection

Regards
Dr iram kiani
03335479483
Sent from Yahoo Mail for iPhone [1]

Links:

[1]
https://mail.onelink.me/107872968?pid=ativeplacement&c=Global_Acquisition_YMktg_315_Internal_EmailSignature&af_sub1=Acquisition&af_sub2=Global_YMktg&af_sub3=&af_sub4=100000604&af_sub5=EmailSignature__Static_&af_ios_store_cpp=9d3a686e-218d-4849-8298-b480188dc8ac&af_android_url=https%3A%2F%2Fplay.google.com%2Fstore%2Fapps%2Fdetails%3Fid%3Dcom.yahoo.mobile.client.android.mail%26listing%3Demail_signature

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Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 12 January, 2026 12:07 PM
To: Shahid Farooque
Subject: Fwd: Subject: Objections to NEPRA (Prosumer) Regulations,2025 - Replacement of Net Metering with Net Billing

----- Original Message -----

Subject: Fwd: Subject: Objections to NEPRA (Prosumer) Regulations,2025 - Replacement of Net Metering with Net Billing
Date: 2026-01-12 10:36
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Subject: Objections to NEPRA (Prosumer) Regulations,2025 - Replacement of Net Metering with Net Billing
Date: 2026-01-09 14:54
From: khurram humaiyun <khumaiyun440@yahoo.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Sir,

I appear before you as a domestic electricity consumer and a duly registered solar prosumer.

With due respect, the proposed shift from Net Metering to Net Billing reads less like energy reform and more like a policy designed to penalize citizens for succeeding where the State has failed.

For years, the Government actively encouraged citizens to install solar systems—promising reduced fuel imports, lower foreign exchange outflow, peak-load relief, and grid stability. Citizens responded responsibly, investing substantial personal savings and delivering precisely those outcomes. Today, instead of addressing chronic line losses, rampant theft, bloated DISCO inefficiencies, and disastrous IPP contracts, the proposed solution is to target the only segment that actually performs efficiently.

Under net billing, the State purchases clean, self-generated solar electricity at a discounted rate and then resells the same electricity back to the consumer at full retail price—loaded with taxes, surcharges, and capacity charges. This is neither sound economics nor fair regulation; it is a system that institutionalizes inequity. It rewards inefficiency and penalizes self-reliance.

Net metering demonstrably reduced peak demand, fuel imports, and pressure on foreign exchange reserves. Net billing achieves none of these objectives. Instead, it protects structural inefficiencies, insulates loss-making entities from accountability, and guarantees continued dependence on expensive and inflexible IPPs.

Even more troubling is the policy's failure to distinguish between ordinary residential prosumers and large commercial installations, effectively holding middle-class households responsible for decades of systemic mismanagement. This is not reform; it is scapegoating.

If this proposal is implemented, citizens will quite rationally conclude that compliance with government policy is punished rather than rewarded, and that investing in clean energy invites regulatory betrayal.

I therefore demand, not request, that NEPRA:

1. Reject the proposed net billing regime outright
2. Permanently protect existing residential prosumers under net metering
3. Cease transferring the cost of state failure onto law-abiding citizens

Pakistan requires the courage to reform broken institutions—not creativity in redistributing the consequences of failure.

- Net metering exposed inefficiency.

- Net billing attempts to conceal it.

Policies that undermine trust, reward inefficiency, and penalize lawful self-generation are not merely misguided; they erode public confidence in regulation itself and deter the very investments Pakistan urgently needs. The proposed shift to net billing reflects an illegal, incompetent, and irrational pattern of decision-making by the present Government, led by the Prime Minister and his Federal Energy Minister, which consistently chooses to punish law-abiding citizens rather than confront its own structural failures in the power sector.

Yours sincerely,

Lt Col (R) Khurram Humaiyun

House No. 602-L, Street-17

Overseas Sector - 3, Ph-8, Bahria Town

Rawalpindi, PAKISTAN

Cell No: 03315246056

Yahoo Mail: Search, organise, conquer [1] Yahoo Mail: Search, organise, conquer [1]

Links:

[1]

https://mail.onelink.me/107872968?pid=nativeplacement&c=US_Acquisition_YMktg_315_SearchOrgConquer_EmailSignature&af_sub1=Acquisition&af_sub2=US_YMktg&af_sub3=&af_sub4=100002039&af_sub5=C01_Email_Static_&af_ios_store_cpp=0c38e4b0-a27e-40f9-a211-f4e2de32ab91&af_android_url=https://play.google.com/store/apps/details?id=com.yahoo.mobile.client.android.mail&listing=search_organize_conquer

--

Regards

Lashkar Khan Qambrani

Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 12 January, 2026 12:08 PM
To: Shahid Farooque
Subject: Fwd: Protest against Net billing Policy NEPRA

----- Original Message -----

Subject: Fwd: Protest against Net billing Policy NEPRA
Date: 2026-01-12 10:37
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Protest against Net billing Policy NEPRA
Date: 2026-01-09 14:34
From: Syed Zahid Ahmad <ahmad245@gmail.com>
To: cad@nepra.org.pk, chairman@nepra.org.pk, registrar@nepra.org.pk

Subject: Formal Protest against Proposed Net Billing Policy (NEPRA)

Respected Registrar / Chairman NEPRA,

I am writing to express my strong reservations and formal protest regarding the proposed transition from Net Metering to Net Billing, scheduled for implementation from January 14, 2026.

The retroactive application of this policy to existing licensees is a breach of trust and a violation of the contractual agreements made at the time of installation. The proposed buyback rates (Rs. 27 for old users and Rs. 11.5 for new users) significantly undermine the financial viability of solar investments, especially when electricity prices are soaring.

I request NEPRA to:

Withdraw the Net Billing proposal and maintain the current Net Metering system.

At the very least, exempt existing users from this change to honor the original terms of their license.

We look forward to a decision that protects the consumer and encourages renewable energy in Pakistan.

please have mercy on honest and taxpayers Pakistani citizens. We are already under a huge financial burden of inflation and other high rates on commodities.

Regards,

Many thanks and Best Regards.

(Syed Zahid Ahmad)
Cell No: +92-321-5075004

Chairman NEPRA

From: Nazir Rana <nazeerrana@gmail.com>
Sent: Tuesday, January 6, 2026 11:38 PM
To: registrar@nepra.org.pk; chairman@nepra.org.pk; cad@nepra.org.pk
Subject: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025

As a domestic solar prosumer in Bahawalpur, I strongly object to the proposed 2025 regulations. I invested PKR 1 Million of my personal savings based on the government's commitment to net-metering. My system still requires 3 more years to break even; any shift to "Gross Metering" or lower buy-back rates now would cause me an irreparable financial loss.

Key Concerns:

Retrospective Penalties: Changing rules mid-contract violates "Vested Rights" and the principle of legitimate expectation.

Economic Injustice: Households bear 100% of the maintenance and capital risks while providing the grid with cheap, clean energy during peak hours.

Breach of Trust: Penalizing early adopters discourages future renewable energy transition and undermines regulatory credibility.

My Demands:

Mandatory Grandfathering: All existing net-metering users must be legally protected under their original terms for the full duration of their agreements.

Exemption from Gross Metering: Existing systems, designed for "Net" exchange, must not be forced into a "Gross" framework.

Prospective Policy Only: Any restrictive changes must apply only to new applicants who have not yet invested their capital.

NEPRA must protect individual citizens from arbitrary policy shifts that favor utility companies over household investors.

Respectfully,

Nazir Ahmad

Consumer ID: 2254190894503

Address: House No. 153-C, GECHS Bahawalpur

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (EIT)	<input type="checkbox"/> DG (Fin)
<input type="checkbox"/> S.A	<input type="checkbox"/> DG (T)
<input type="checkbox"/> Cons. (Tech)	<input type="checkbox"/> Cons. (Admin)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN
BY No. 156
Date: 07-1-26

Chairman NEPRA

From: Ahmed Raheeq <ahmed.raheeq@hotmail.com>
Sent: Tuesday, January 6, 2026 7:58 PM
To: cad@nepra.org.pk
Cc: registrar@nepra.org.pk; chairman@nepra.org.pk
Subject: Objection NEPRA (Prosumer) Regulations, 2025

Forwarded please:
☒ For no action ☐ For Information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Subst.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Tr.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EISOM)

For kind information, please.
☒ Chairman ☐ 2. M (Tech)
☒ 3. M (Law) ☐ 4. M (Dev)

Submitted by: An Individual Household Prosumer

Mar Registrar

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into **millions of rupees**, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering.

This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and
- converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are **long-term household infrastructure investments**. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

- breaks public trust,

CHAIRMAN
Dy No. 149
Date: 07-01-26

violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,

discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

households bear **all capital, maintenance, and compliance costs**,

distribution companies can limit or curtail exports,

yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

the household carries all financial risk,

the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are **not wealthy investors**. They are middle-income families trying to:

protect themselves from rising electricity tariffs,

reduce load-shedding exposure,

contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

how export rates were determined,

whether savings from reduced fuel imports were considered,

how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. Protect Existing Household Prosumers

All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.

2. No Mid-Term Changes to Buy-Back Rates

Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.

3. Fair and Transparent Valuation

Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.

4. Clear Policy for Future Installations Only

If changes are necessary, they should apply only to **future applicants**, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure **fairness, predictability, and protection for household prosumers** who invested in good faith.

Chairman NEPRA

From: Zia-ur-Rehman Gondal <engrzia76@gmail.com>
Sent: Tuesday, January 6, 2026 7:40 PM
To: cad@nepra.org.pk; Registrar@nepra.org.pk; Chairman@nepra.org.pk
Subject: Formal Objection to Proposed Prosumer Regulations 2025 – Request for Exemption of Existing Net-Metering Consumers.

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For Information
<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Enr.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (L.T.)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUGM)

For kind information, please,
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

FORMAL COMPLAINT / PUBLIC COMMENT

TO: The Registrar, National Electric Power Regulatory Authority (NEPRA), Islamabad.

SUBJECT: Formal Objection to Proposed Prosumer Regulations 2025 – Request for Exemption of Existing Net-Metering Consumers.

1. Personal Financial Stakes & Investment Context

I am a domestic consumer and a solar net-metering customer residing in Islamabad. In good faith, following the Government of Pakistan's green energy initiatives, I invested **PKR 1.7 Million** of my personal savings to install a rooftop solar system.

Based on the prevailing regulations at the time of my installation, my financial model projected a specific payback period. As of today, I still require **three (3) more years to reach my break-even point**. Any shift toward "Gross Metering" or a reduction in buy-back rates mid-contract would essentially freeze my recovery and turn a responsible household investment into a permanent financial loss.

2. Violation of "Vested Rights" & Policy Consistency

The proposed 2025 regulations threaten to retrospectively alter the terms of my agreement.

Retrospective Application: Applying "Gross Metering" or lower rates to existing users violates the principle of legitimate expectation.

Breach of Trust: My investment was predicated on a 7-year (or 10-year) agreement. Changing these terms unilaterally halfway through undermines the sanctity of regulatory contracts in Pakistan.

3. Discriminatory Economic Burden

The shift to Gross Metering disproportionately targets middle-class households who:

- **Assume All Risk:** I bear the costs of maintenance, cleaning, and equipment depreciation.
- **Subsidize the Grid:** My system provides cheap, clean energy during peak daylight hours, reducing the need for expensive furnace oil/LNG imports.
- **Lack of Recourse:** Unlike commercial power plants (IPPs), I do not have "capacity payments" or sovereign guarantees to protect my investment if the tariff is lowered.

4. Specific Demands & Recommendations

I urge NEPRA to incorporate the following protections into the 2025 Regulations:

Registrar

REGISTRATION	RECEIVED	DATE
ADG	SA	US
SLA	SA	SA

REGISTRAR OFFICE
Dy. No. 584
Date: 07/01/26

CHAIRMAN

Dy. No. 148
Date: 07-01-26

- **"Grandfathering" Clause:** Explicitly state that all existing net-metering consumers (installed prior to the 2025 notification) shall remain under the **Net-Metering** regime for the remainder of their initial agreement period.
- **Exemption from Gross Metering:** Existing prosumers must be exempt from any "Gross Metering" framework, as our systems were technically and financially designed for "Net" exchange.
- **Protection of Payback Periods:** Regulations should ensure that no change is made that extends the payback period of a household beyond the original 4-5 year estimate.
- **Prospective Application Only:** Any new restrictive policies or lower buy-back rates should apply **only to new applicants** who can then make an informed decision before spending their capital.

5. Conclusion

The 2025 Regulations, as currently drafted, penalize early adopters of renewable energy. For a resident of Islamabad who has spent 17 Lac Rupees, these changes represent a direct financial penalty for supporting the national grid. I request NEPRA to act as a fair regulator and protect the individual household from being used to cover the inefficiencies of the wider power sector.

Respectfully submitted,

[Zia ur Rehman Gondal]

Cell: 03219595025

[House 248 Street 10, Sector I-10/2, Islamabad]

[Reference Number: 11141251450300]

[6th Jan, 2026]

Chairman NEPRA

From: Tausif Anwar <tausifanwar@gmail.com>
Sent: Tuesday, January 6, 2026 9:13 PM
To: registrar@nepra.org.pk; cad@nepra.org.pk; Chairman@nepra.org.pk
Subject: NEPRA (Prosumer) Regulations, 2025

Forwarded please:

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<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input checked="" type="checkbox"/> M&E (Reg.)	<input type="checkbox"/> Consult (C/Reg)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

PUBLIC COMMENTS ON

NEPRA (Prosumer) Regulations, 2025

Submitted by: An Individual Household Prosumer

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into **millions of rupees**, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering.

This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and
- converts a family investment into a high-risk gamble.

CHAIRMAN

Dy No. 152
Date: 07-01-26

Household solar systems are not speculative ventures; they are **long-term household infrastructure investments**. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

- breaks public trust,
- violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,
- discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

- households bear **all capital, maintenance, and compliance costs**,
- distribution companies can limit or curtail exports,
- yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

- the household carries all financial risk,
- the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are **not wealthy investors**. They are middle-income families trying to:

- protect themselves from rising electricity tariffs,
- reduce load-shedding exposure,
- contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

- how export rates were determined,
- whether savings from reduced fuel imports were considered,
- how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. **Protect Existing Household Prosumers**

All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.

2. **No Mid-Term Changes to Buy-Back Rates**

Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.

3. **Fair and Transparent Valuation**

Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.

4. **Clear Policy for Future Installations Only**

If changes are necessary, they should apply only to **future applicants**, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure **fairness, predictability, and protection for household prosumers** who invested in good faith.

Regards,
Engr. Tausif Anwar
Reference No. 22 15419 0906809 U
+92 300 44 832 66

Chairman NEPRA

From: Zafar Ahmed Khan <zafarahmedkhan@hotmail.com>
 Sent: Tuesday, January 6, 2026 10:20 PM
 To: cad@nepra.org.pk; registrar@nepra.org.pk; chairman@nepra.org.pk
 Attachments: Objections on NEPRA proposed regulations.pdf

Registrar

NEPRA
 Licensing Department
 Diary No. 295
 Date: 12-1-26

Has

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTRCM)

For kind information, please.

☒ Chairman 2. M (Tech)
☒ 3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
 Diary No: 295
 Date: 09/01/26

CHAIRMAN
 Dy No: 153
 Date: 07-01-26

PUBLIC COMMENTS ON

NEPRA (Prosumer) Regulations, 2025

Submitted by: An Individual Household Prosumer

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into millions of rupees, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering. This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and
- converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are long-term household infrastructure investments. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

- breaks public trust,
- violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,
- discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

- households bear all capital, maintenance, and compliance costs,
- distribution companies can limit or curtail exports,
- yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

- the household carries all financial risk,
- the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are not wealthy investors. They are middle-income families trying to:

- protect themselves from rising electricity tariffs,
- reduce load-shedding exposure,
- contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

- how export rates were determined,
- whether savings from reduced fuel imports were considered,
- how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. Protect Existing Household Prosumers

All households with installed or approved solar systems should be fully protected

under the terms that existed at the time of installation.

2. No Mid-Term Changes to Buy-Back Rates

Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.

3. Fair and Transparent Valuation

Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.

4. Clear Policy for Future Installations Only

If changes are necessary, they should apply only to future applicants, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure fairness, predictability, and protection for household prosumers who invested in good faith.

Chairman NEPRA

From: Muhammad Munawar Ahmed <munawar69@iub.edu.pk>
Sent: Wednesday, January 7, 2026 12:14 AM
To: cad@nepra.org.pk; Registrar@nepra.org.pk; Chairman@nepra.org.pk
Subject: OBJECTION TO THE PROPOSED PROSUMER REGULATIONS 2025
Attachments: NEPRA APPEAL.pdf

Dear Sir,

I hope this email finds you in good health. I am writing to formally submit my objection to the proposed policy changes concerning solar prosumers, which have serious financial and legal implications for existing consumers who invested in good faith under the prevailing regulatory framework.

Kindly find attached the detailed formal appeal outlining my concerns and submissions for your careful review and consideration. I respectfully request that the issues raised therein be duly examined to ensure fairness, regulatory certainty, and protection of consumer rights.

Thank you for your time and attention to this important matter

--

Muhammad Munawar Ahmed,
Lecturer,,
Department of IT,IUB

RECEIVED
12-1-26

Registrar

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E&C/M)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 588
Date: 09/01/26

CHAIRMAN
Diary No: 157
Date: 07-1-26

The Registrar,
National Electric Power Regulatory Authority (NEPRA)

Subject: **OBJECTION TO THE PROPOSED PROSUMER REGULATIONS 2025**

I am a domestic solar prosumer under Multan Electric Power Company (MEPCO), Consumer Number 22154190698836, residing at House No. 183, Gulberg Colony, near Maqbool Colony, Bahawalpur. I respectfully submit my strong objection to the proposed Prosumer Regulations 2025.

I invested a substantial amount of my personal savings to install a rooftop solar system based on the Government of Pakistan's clearly articulated policy and regulatory framework for net metering. This investment decision was made in good faith, relying on the assurances provided by NEPRA and the relevant distribution company. My system has not yet reached its break-even point and still requires several years to recover the invested capital. Any unilateral shift at this stage towards gross metering or a significant reduction in buy-back rates would result in serious and irreparable financial loss.

Altering the regulatory framework retrospectively amounts to penalizing consumers who complied with the law and invested under existing rules. Such changes undermine the concepts of vested rights and legitimate expectation, which are fundamental principles of administrative fairness. As prosumers, we bear the full cost of capital, maintenance, and operational risks, while simultaneously contributing clean and affordable electricity to the national grid, particularly during peak daylight hours. Penalizing this contribution creates economic injustice and discourages responsible citizen investment.

Any action that adversely affects existing prosumers also represents a breach of regulatory trust. Early adopters of renewable energy responded to national energy goals and policy incentives. Subjecting them to unfavorable changes after investment damages confidence in regulatory institutions and will inevitably discourage future participation in renewable energy initiatives, directly contradicting national sustainability objectives.

I therefore respectfully urge NEPRA to ensure that all existing net-metering consumers are fully protected under the terms and conditions applicable at the time of their interconnection for the complete duration of their agreements. Existing installations, which were designed and financially modeled on a net-metering basis, should not be compelled to shift to a gross-metering regime. Any proposed restrictive or revised framework should be applied strictly on a prospective basis and only to new applicants who have not yet made financial commitments.

NEPRA is expected to act as an independent regulator that safeguards the interests of individual consumers and protects them from arbitrary policy shifts that disproportionately benefit distribution companies at the expense of household investors who supported national energy policy in good faith.

Respectfully submitted,

Muhammad Munawar Ahmed
Consumer Number: 22154190698836
House No. 183, Gulberg Colony,
Near Maqbool Colony,
Bahawalpur

Chairman NEPRA

From: Samia Zia <samiazia102@gmail.com>
Sent: Wednesday, January 7, 2026 4:50 PM
To: cad@nepra.org.pk; Chairman@nepra.org.pk

SUBJECTION: OBJECTION TO PROPOSED CONSUMER REGULATIONS 2025

To: The Registrar, NEPRA

As a domestic solar consumer in Islamabad, I strongly object to the proposed 2025 regulations. I invested PKR __1.7__ Million of my personal savings based on the government's commitment to net-metering. My system still requires 3 more years to break even; any shift to "Gross Metering" or lower buy-back rates now would cause me an irreparable financial loss.

Key Concerns:

Retrospective Penalties: Changing rules mid-contract violates "Vested Rights" and the principle of legitimate expectation.

Economic Injustice: Households bear 100% of the maintenance and capital risks while providing the grid with cheap, clean energy during peak hours.

Breach of Trust: Penalizing early adopters discourages future renewable energy transition and undermines regulatory credibility.

My Demands:

Mandatory Grandfathering: All existing net-metering users must be legally protected under their original terms for the full duration of their agreements.

Exemption from Gross Metering: Existing systems, designed for "Net" exchange, must not be forced into a "Gross" framework.

Prospective Policy Only: Any restrictive changes must apply only to new applicants who have not yet invested their capital.

NEPRA must protect individual citizens from arbitrary policy shifts that favor utility companies over household investors.

Respectfully,

[Samia Saeed Ch]
Family care hospital, Mehrabad Rawalpindi]
03335373120

REGISTRAR OFFICE

REGISTRAR OFFICE

Diary No: 588

Date: 08/01/26

Forwarded phase:

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN
By No. 155
Date: 07-1-26

Chairman NEPRA

From: Ijaz Ahmed Khan <ijaz61@gmail.com>
Sent: Thursday, January 8, 2026 10:24 AM
To: Chairman@nepra.org.pk

Dear Sir,
AOA

I am using Net Metering Sys for the last two years after spending lots of money to reduce my expenses but with this new policy people will be forced to go on Hybrid Sys which will left no interest with Government. NEPRA will be at lost end of the day and their manpower will required to be reduced. It will not be in the interest of both User and NEPRA.
Therefore, I record my protest to your Office for discontinuation this proposal.

Best Regards,

EJAZ AHMAD KHAN
Wing Commander (Retd)
Manager Defence Contracts

E-mail: ejaz_sat@yahoo.com, Ph: +92 (51) 5503887, +92 (51) 9281037-38 Ext 14
Cell No. +92 (342) 5414413, +92(320)5593406,
Fax: +92 (51) 9280525
SHAHEEN AEROTRADERS , Opp. BB Int'l Airport, Rawalpindi Pakistan

Forwarded please:

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For kind information, please,

1. Chairman	2. M. (Tech)
3. M. (Law)	4. M. (Dev)

REGISTRAR OFFICE
Diary No. 586
Date: 08/01/26

CHAIRMAN
Dy No. 184
Date: 08-1-26

Chairman NEPRA

From: Ali Ubaid <alibinubaid@gmail.com>
Sent: Wednesday, January 7, 2026 12:15 AM
To: cad@nepra.org.pk
Cc: chairman@nepra.org.pk
Subject: OBJECTION TO PROPOSED PROSUMER REGULATIONS 2025

To: The Registrar, NEPRA

As a domestic solar prosumer in Bahawalpur, I strongly object to the proposed 2025 regulations. I invested PKR 1.1 Million Rupees from my personal savings based on the government's commitment to net-metering. My system still requires 6 more years to break even; any shift to "Gross Metering" or lower buy-back rates now would cause me an irreparable financial loss.

Key Concerns:

Retrospective Penalties: Changing rules mid-contract violates "Vested Rights" and the principle of legitimate expectation.

Economic Injustice: Households bear 100% of the maintenance and capital risks while providing the grid with cheap, clean energy during peak hours.

Breach of Trust: Penalizing early adopters discourages future renewable energy transition and undermines regulatory credibility.

My Demands:

Mandatory Grandfathering: All existing net-metering users must be legally protected under their original terms for the full duration of their agreements.

Exemption from Gross Metering: Existing systems, designed for "Net" exchange, must not be forced into a "Gross" framework.

Prospective Policy Only: Any restrictive changes must apply only to new applicants who have not yet invested their capital.

NEPRA must protect individual citizens from arbitrary policy shifts that favor utility companies over household investors.

Respectfully,

Ali bin Ubaid

Consumer ID: 22154110047301

Address: House no 763, Islampura, Bahawalpur

On Wed, Jan 7, 2026, 12:11 AM Ali Ubaid <alibinubaid@gmail.com> wrote:

Forwarded please:

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<input type="checkbox"/> NEA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CHCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) ... 4. M (Dev)

REGISTRAR OFFICE
Diary No: 587
Date: 08/01/26

CHAIRMAN
By No: 158
Date: 07-1-26

Chairman NEPRA

From: Munir AHMED <munir666@hotmail.com>
Sent: Thursday, January 8, 2026 9:00 AM
To: chairman@nepra.org.pk
Subject: New policy on NetMeeting

Dear Sir,

I think that in solar policy the small domestic user using upto 15 KW may be separated from other large users and commercial units.

This may help the poor domestic users.

As per Islamic rules and order of Quran e Pak the contracts can not be cancelled with out mutual agreement.

Regards

Munir Ahmed

House no 868

St. 27

G-9/1

Islamabad

03028500869

Sent from Outlook for Android

Registered

Forwarded please:

☒ For noc. action ☐ For information

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Munir

CHAIRMAN
DY No. 181
Date: 08-01-26

REGISTRAR OFFICE

Diary No: 290

Date: 09/01/26

Chairman NEPRA

From: Shariq Ali <shariq.ali511@gmail.com>
Sent: Thursday, January 8, 2026 9:17 AM
To: Chairman@nepra.org.pk
Subject: Net metering

Respected Chairman NEPRA,

I am writing to express concern over the proposed reduction of the net metering solar buyback rate to PKR 11 per unit. This rate is very low and does not justify the heavy investments made by existing solar consumers under previous approved policies.

I respectfully request that existing net metering consumers, particularly those with systems up to 20 kW, be exempted from this reduced rate or protected through a grandfathering mechanism. Abrupt policy changes will harm investor confidence and discourage renewable energy adoption.

I urge NEPRA to reconsider and revise the proposal in a fair and balanced manner.

Yours sincerely,

Shariq Ali Awan

Concerned Net Metering Consumer

Pakistan

Forwarded please:

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIBCM)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN
DY No. 182
Date: 08-01-26

Chairman NEPRA

From: Bashir Kiani <kiani62ak@gmail.com>
Sent: Thursday, January 8, 2026 10:20 AM
To: cad@nepra.org.pk
Subject: Request for Protection of Existing Solar Net Metering Consumers in Pakistan

Respected Sir/Madam,

I hope this email finds you well.

I am writing to express my serious concern regarding the proposed changes in the net metering policy in Pakistan. Many citizens have already invested a significant amount of their hard-earned money in installing solar systems under the existing government-approved net metering policy.

These investments were made based on the rules, rates, and assurances provided by the government at that time. If the policy is now changed and applied to existing solar consumers, it would be highly unjust and unfair. Such a decision would cause financial loss to those who trusted government policies and contributed positively toward reducing the national energy burden.

We strongly request that if any new net metering policy is to be implemented, it should apply only to new customers, not to those who have already installed solar systems under the previous policy. Protecting existing consumers will maintain public trust and encourage future investment in renewable energy.

Solar energy is beneficial not only for individuals but also for the country's economy and environment. Penalizing early adopters will discourage others from investing in clean energy solutions.

We humbly request the government to reconsider this matter and ensure justice for existing solar net metering consumers.

Thank you for your time and consideration.

Yours sincerely,
Muhammad Bashir Kiani
Islamabad
03329299367

Forwarded please:

☒ For action ☐ For information

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For kind information, please,

☒ Chairman ☒ 2. M (Tech)
☒ 3. M (Law) ☒ 4. M (Dev)

REGISTRY/CAR OFFICE

Diary No: 585

Date: 09/01/26

CHAIRMAN
By No. 183
Date: 28-01-26

Chairman NEPRA

From: huzaifa adrees <huzaifaadrees@gmail.com>
Sent: Tuesday, January 6, 2026 9:12 PM
To: Chairman@nepra.org.pk
Subject: Fwd: Serious Concerns and Formal Objection Regarding Proposed Net Billing Policy

----- Forwarded message -----

From: huzaifa adrees <huzaifaadrees@gmail.com>

Date: Tue, 6 Jan 2026, 9:10 pm

Subject: Serious Concerns and Formal Objection Regarding Proposed Net Billing Policy

To: scad@nepra.org.pk>

Registrar

Forwarded Message

☒ For nec. action ☐ For Information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please,
Chairman Z. M (Tech)

REGISTRAR OFFICE
Diary No.: 392
Date: 09/01/26

Respected Chairman NEPRA / Registrar NEPRA,

With due respect, this email is being written to formally convey the deep concern, anxiety, and strong reservations of a large number of existing and prospective distributed solar energy consumers regarding the proposed Net Billing Policy, reportedly scheduled for implementation with effect from 14 January 2026.

While we fully acknowledge NEPRA's mandate to ensure sustainability of the power sector, it is respectfully submitted that the proposed framework—particularly its retrospective application on existing net-metering licensees—raises serious technical, economic, and policy-credibility concerns.

1. Impact on Existing Net-Metering Consumers

Existing net-metering consumers made long-term financial investments under a clearly defined regulatory regime. Altering the settlement mechanism post-investment undermines regulatory predictability, investor confidence, and the principle of legitimate expectation. Even with a differentiated purchase rate, applying net billing to old licensees effectively changes the commercial basis of their decisions.

2. Likely Shift Towards Battery Storage (Unintended Consequences)

A significant and immediate consequence of this policy will be a massive shift from grid export to battery-based self-consumption. Consumers will rationally prefer storing energy rather than exporting it at uneconomical rates. This will:

Reduce daytime energy injection into the grid

Increase evening peak demand pressure

Deprive DISCOs of low-cost distributed generation

Accelerate battery imports, adding foreign exchange burden

Create new safety, recycling, and environmental challenges

In effect, the grid will lose the very support that net metering was designed to provide.

3. Technical & Grid Stability Concerns

Net-metering systems currently contribute to:

Voltage support during daytime

Reduction in transmission and distribution losses

Localized generation near consumption points

Discouraging exports will reverse these benefits and may increase system stress, particularly during peak evening hours when battery-dependent consumers reconnect to the grid.

4. Public Reaction & Social Acceptance Risk

CHAIRMAN
Dy No.: 151
Date: 07-01-26

There is widespread public unease regarding both the substance of the policy and the perception of limited stakeholder participation during hearings. Without broad consultation and public acceptance, implementation risks strong resistance, reputational damage, and loss of trust in regulatory processes.

5. Constructive Way Forward (Respectful Suggestions)

In light of the above, we respectfully request NEPRA to consider:

Full exemption of existing net-metering licensees from the new net billing regime

Grandfathering based on installation or agreement date

A gradual, consultative transition model for new consumers only

Transparent disclosure of long-term sector modeling and impact analysis

Such an approach will preserve investor confidence, maintain grid support, and ensure policy stability while still allowing reforms for future entrants.

This representation is made in good faith and in the national interest, with the sincere hope that NEPRA will revisit the proposed framework and engage stakeholders meaningfully before final implementation.

We remain available for any technical consultation or data-driven discussion that may assist the Authority in reaching a balanced and sustainable decision.

Respectfully submitted,

All solar users

Chairman NEPRA

From: Muhammad Iqbal <iqbalfateh@gmail.com>
Sent: Tuesday, January 6, 2026 9:06 PM
To: Chairman@nepra.org.pk
Subject: Revised Net metering Solar Policy
Attachments: Objections on NEPRA proposed regulations.docx; Untitled attachment 00010.txt

~~Registrar~~

Forwarded please:

☒ For nec. action ☐ For Information

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Man

NEPRA

Licensing Department
Diary No. 278
Date: 12-01-26

REGISTRAR OFFICE
Diary No: 593
Date: 09/01/26

CHAIRMAN
By No. 158
Date: 07-01-26

Household
renewable
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- by
- violating the
- duty

A policy

4. One-Sided

Under the

- household
- duty
- years

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Such impact

5. Impact

Most households
trying to:

- protect
- recover
- secure

PUBLIC COMMENTS ON

NEPRA (Prosumer) Regulations, 2025

Submitted by: An Individual Household Prosumer

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into **millions of rupees**, based on the Government of Pakistan’s stated policy to encourage renewable energy and net metering.

This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the lifetime of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and
- converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are **long-term household infrastructure investments**. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

- how export rates were determined,
- whether savings from reduced fuel imports were considered,
- how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. Protect Existing Household Prosumers

All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.

2. No Mid-Term Changes to Buy-Back Rates

Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.

3. Fair and Transparent Valuation

Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.

4. Clear Policy for Future Installations Only

If changes are necessary, they should apply only to **future applicants**, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure **fairness, predictability, and protection for household prosumers** who invested in good faith.

Chairman NEPRA

From: Usman Rahi <usmanrahi.damco@gmail.com>
Sent: Saturday, January 10, 2026 6:35 PM
To: undisclosed-recipients:
Subject: Serious Concern Regarding Proposed Change from Net Metering to Net Billing Policy

Dear Sir/Madam,

I am writing to express my serious concern regarding the recent news about the proposed change in the net metering policy to a net billing policy. I am a new AMI meter user, and like thousands of other consumers, I have invested a substantial amount of money in installing a solar system. This investment was made after careful planning, and in many cases—including mine—it involved taking loans based on the long-term viability and assurances of the existing net metering policy.

It is deeply concerning that NEPRA is considering changes that would not only affect new applicants but also alter the terms for existing net metering consumers. Such a move would effectively change contracts after investments have already been made, which is unfair and financially damaging to consumers who acted in good faith.

Net billing, as proposed, is an anti-consumer policy. It is unjust that solar consumers are required to sell their surplus electricity to DISCOs at significantly lower rates, only to buy electricity back at nearly three times the price. This discourages clean energy adoption and places an additional financial burden on the general public.

As solar users, we are actively supporting the government by contributing to cleaner, cheaper, and environmentally friendly electricity generation. Unfortunately, instead of being encouraged, we feel penalized for producing clean and green energy.

I respectfully request NEPRA to reconsider this decision and continue with the net metering policy. Rather than burdening consumers further, the focus should be on reducing reliance on costly electricity from IPPs and investing in strengthening the national grid to effectively manage solar load. Across the world, governments promote and incentivize renewable energy—sadly, this proposed policy shift appears to move us in the opposite direction.

I urge you to protect the interests of consumers and support sustainable energy solutions by maintaining the net metering framework.

Thank you for your time and consideration.

Yours sincerely,

A Concerned Net Metering Consumer

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/Reg.M)

For kind information, please:

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

REGISTRAR OFFICE
Diary No: 231
Date: 13-1-26

CHAIRMAN
By No: 306
Date: 10-1-26

Chairman NEPRA

From: Salik Sheikh <saliksheikh448@yahoo.com>
Sent: Saturday, January 10, 2026 5:40 PM
To: Chairman@nepra.org.pk
Subject: Net metering policy

Daer Sir

It is humbly requested that while amending the existing net metering policy....do keep in mind more than eighty percent consumers are those who have faced lots of hardships while switching to solar and having green meters installed.

Many have taken loan, many have taken contribution from family members as they could not bear the rising cost of electricity.

Atleast old consumers should be given relief as they invested only after guaging benefits closely. I think this will be very upsetting for existing consumers who got net meters installed.

At least let them breath freely for the agreed period in their existing contract..

Truly

Salik Naseer Ahmad.

Yahoo Mail: Search, organise, conquer

Registrar

Forwarded please:

☒ For nec. action

☐ For information

☒ DG (Lic)

☐ DG (Adminstr)

☒ SA (M&E)

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☐ ADG (Inf.)

☐ DG (Fin)

☒ SLA

☐ Dir. (R.T)

☐ Consult (Tech.)

☐ Consult (Admin)

For kind information, please,

1. Chairman

2. M (Tech)

3. M (Law)

4. M (Dev)

REGISTRAR OFFICE
Diary No: 730
Date: 13.1.26

CHAIRMAN
Dy No: 305
Date: 19-1-26

Chairman NEPRA

From: Irfan Ahmed <irfan.ahmed33@gmail.com>
Sent: Monday, January 12, 2026 8:08 AM
To: Chairman@nepra.org.pk; cad@nepra.org.pk
Subject: Complaint and Objection

REGISTRAR OFFICE
Diary No: 229
Date: 13.1.26

Dear Chairman NEPRA,

I hope this message finds you well.

I am writing to formally lodge my complaint and strong objection to the proposed Net Billing Policy, which effectively ends the existing Net Metering mechanism and is planned to be implemented from 14 January 2026.

This policy has caused serious concern among existing and potential solar consumers across Pakistan.

Thousands of consumers invested heavily in solar power systems based on the assurance and framework of the approved Net Metering Policy. Applying a new policy retrospectively to existing licensees is unfair, unjust, and damaging to consumer confidence.

My key concerns are as follows:

Existing net metering users are being forced into a new framework, despite having made long-term financial investments under the previous policy.

The significant reduction in the purchase (buyback) rate—especially for new users—will severely impact the economic viability of solar energy.

The consultation and hearing process appeared to have limited and restricted consumer participation, raising transparency concerns.

This policy discourages renewable energy adoption and contradicts national goals of promoting clean and affordable energy.

I respectfully request NEPRA to:

Exempt all existing net metering consumers from the proposed Net Billing Policy, and

Allow them to continue under the original net metering terms for the validity of their licenses, or

Reconsider the policy after conducting broader and meaningful stakeholder consultations.

I urge NEPRA, as an independent and consumer-protective regulator, to safeguard the interests of consumers and ensure fairness and regulatory consistency.

Thank you for your time and consideration. I sincerely hope NEPRA will revisit this decision in the larger public interest.

Your sincerely,

Irfan Ahmed

Forwarded please:

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For kind information, please:

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

CHAIRMAN
Dy No: 308
Date: 12-1-26

Chairman NEPRA

From: Shahzaib Bhatti <bhattishahzaib028@gmail.com>
Sent: Thursday, January 8, 2026 7:40 PM
To: Chairman@nepra.org.pk
Subject: Subject Concerns Regarding NEPRA (Prosumer) Regulations, 2025 Dear Sir, Please find the attached document outlining my concerns and objections regarding the proposed NEPRA (Prosumer) Regulations, 2025. Regards, An Individual Household Prosumer

Sent from my iPhone

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information, please:

<input checked="" type="checkbox"/> Chairman	<input type="checkbox"/> 2. M (Tech)
<input checked="" type="checkbox"/> 3. M (Law)	<input type="checkbox"/> 4. M (Dev)

Registrar

REGISTRAR OFFICE
Diary No. 246
Date: 13.1.26

CHAIRMAN
DY No. 257
Date: 09-01-26

Chairman NEPRA

From: HAZIQ rehman <haziqrehman111@gmail.com>
Sent: Thursday, January 8, 2026 7:41 PM
To: Chairman@nepra.org.pk
Subject: Protest against New net metering billing policy

Respected Chairman NEPRA,

I am writing to formally register my strong protest and serious concern regarding the recently announced changes to the net metering policy.

The proposed revisions, particularly the reduction in the buyback rate for surplus solar energy and other restrictive measures, will severely undermine the confidence of consumers who have invested in renewable energy in good faith under existing regulations. Thousands of households and businesses made substantial financial commitments based on long-term policy assurances, and sudden changes place an unfair economic burden on them.

Net metering has played a crucial role in promoting clean energy, reducing load on the national grid, lowering transmission losses, and supporting Pakistan's commitments toward sustainable development and energy security. Weakening this policy discourages future investment in renewable energy at a time when the country urgently needs cost-effective and environmentally friendly power solutions.

Moreover, the revised policy appears to favor inefficiencies in the existing power sector instead of encouraging decentralised generation and consumer participation. Penalizing solar adopters will not resolve systemic issues such as line losses, capacity payments, and governance challenges within the power sector.

I respectfully urge NEPRA to:

- Withdraw or suspend the revised net metering policy,
- Conduct broad and transparent consultations with stakeholders,
- Protect the rights and investments of existing net metering consumers, and
- Continue policies that encourage renewable energy adoption rather than discouraging it.

I hope NEPRA will reconsider this decision in the larger national interest and uphold its role as an independent and fair regulator.

Yours sincerely,
A concerned consumer

Forwarded please:
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Economic)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 739
Date: 13.1.26

CHAIRMAN
By No: 256
Date: 09-01-26

Chairman NEPRA

From: Shahzaib Bhatti <bhattishahzaib028@gmail.com>
Sent: Thursday, January 8, 2026 7:44 PM
To: Chairman@nepra.org.pk

Forwarded please:	
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For kind information, please.	
<input checked="" type="checkbox"/> Chairman	<input type="checkbox"/> M (Tech)
<input checked="" type="checkbox"/> M (Law)	<input type="checkbox"/> M (Dev)

Registrar

PUBLIC COMMENTS ON

NEPRA (Prosumer) Regulations, 2025

Submitted by: An Individual Household Prosumer

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into **millions of rupees**, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering. This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and
- converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are **long-term household infrastructure investments**. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

- breaks public trust,
- violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,
- discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

CHAIRMAN

Dy No. 259
Date: 09-01-26

households bear **all capital, maintenance, and compliance costs**,
distribution companies can limit or curtail exports,
yet households have no protection against tariff reductions or revenue uncertainty.
This creates a one-sided arrangement where:
the household carries all financial risk,
the utility and the government face none.
Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are **not wealthy investors**. They are middle-income families trying to:

- protect themselves from rising electricity tariffs,
- reduce load-shedding exposure,
- contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

- how export rates were determined,
- whether savings from reduced fuel imports were considered,
- how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. Protect Existing Household Prosumers

All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.

2. No Mid-Term Changes to Buy-Back Rates

Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.

3. Fair and Transparent Valuation

Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.

4. Clear Policy for Future Installations Only

If changes are necessary, they should apply only to **future applicants**, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure **fairness, predictability, and protection for household prosumers** who invested in good faith. Sent from my iPhone

Chairman NEPRA

From:
Sent:
To:
Subject:

khurram humaiyun <khumaiyun440@yahoo.com>
Friday, January 9, 2026 2:46 PM
chairman@nepra.org.pk
Subject: Objections to NEPRA (Prosumer) Regulations, 2025 - Replacement of Net Metering with Net Billing

Forwarded please:
☒ For next action ☐ For information

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For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

Sir,

I appear before you as a domestic electricity consumer and a duly registered solar prosumer. With due respect, the proposed shift from Net Metering to Net Billing reads less like energy reform and more like a policy designed to penalize citizens for succeeding where the State has failed. For years, the Government actively encouraged citizens to install solar systems—promising reduced fuel imports, lower foreign exchange outflow, peak-load relief, and grid stability. Citizens responded responsibly, investing substantial personal savings and delivering precisely those outcomes. Today, instead of addressing chronic line losses, rampant theft, bloated DISCO inefficiencies, and disastrous IPP contracts, the proposed solution is to target the only segment that actually performs efficiently.

Under net billing, the State purchases clean, self-generated solar electricity at a discounted rate and then resells the same electricity back to the consumer at full retail price—loaded with taxes, surcharges, and capacity charges. This is neither sound economics nor fair regulation; it is a system that institutionalizes inequity. It rewards inefficiency and penalizes self-reliance.

Net metering demonstrably reduced peak demand, fuel imports, and pressure on foreign exchange reserves. Net billing achieves none of these objectives. Instead, it protects structural inefficiencies, insulates loss-making entities from accountability, and guarantees continued dependence on expensive and inflexible IPPs.

Even more troubling is the policy's failure to distinguish between ordinary residential prosumers and large commercial installations, effectively holding middle-class households responsible for decades of systemic mismanagement. This is not reform; it is scapegoating.

If this proposal is implemented, citizens will quite rationally conclude that compliance with government policy is punished rather than rewarded, and that investing in clean energy invites regulatory betrayal.

I therefore demand, not request, that NEPRA:

1. Reject the proposed net billing regime outright
2. Permanently protect existing residential prosumers under net metering
3. Cease transferring the cost of state failure onto law-abiding citizens

Pakistan requires the courage to reform broken institutions—not creativity in redistributing the consequences of failure.

- Net metering exposed inefficiency.
- Net billing attempts to conceal it.

Policies that undermine trust, reward inefficiency, and penalize lawful self-generation are not merely misguided; they erode public confidence in regulation itself and deter the very investments Pakistan urgently needs. The proposed shift to net billing reflects an illegal, incompetent, and irrational pattern of decision-making by the present Government, led by the Prime Minister and his Energy Minister, which consistently chooses to punish law-abiding citizens rather than confront its own structural failures in the power sector.

Yours sincerely,

Lt Col (R) Khurram Humaiyun
House No. 602-L, Street-17
Overseas Sector - 3, Ph-8, Bahria Town

CHAIRMAN

Dy No. 283
Date: 09-1-26

REGISTRAR OFFICE
Diary No: 766
Date: 13-1-26

Rawalpindi, PAKISTAN
Cell No: 03315246056

Yahoo Mail: Search, organise, conquer

Chairman NEPRA

From: Anosh Shaheen <anoshshaheen945@gmail.com>
Sent: Friday, January 9, 2026 11:39 AM
To: cad@nepra.org.pk; Registrar@nepra.org.pk; Chairman@nepra.org.pk
Subject: Strong Objection Against New Net Billing Policy & Request to Protect Existing Net Metering Users

Dear Chairman NEPRA / Registrar NEPRA,

Main NEPRA ki proposed Net Billing Policy (jo Net Metering ke khatmay ke liye 14 January 2026 se lagu ki ja rahi hai) ke khilaf apna sakht ehtijaj record karwana chahta hoon.

Yeh policy khas taur par existing net metering users ke liye bohat zyada na-insafi par mabni hai. Hazaron consumers ne solar systems par heavy investment sirf is liye ki kyun ke NEPRA ki approved Net Metering policy par bharosa tha. Ab is policy ko retrospectively change karna consumers ke trust aur regulatory commitment ke bilkul khilaf hai.

Proposed purchase rate — Rs. 27/unit existing users ke liye aur Rs. 11.5/unit new users ke liye — solar investment ko financially non-viable bana dega. Is se na sirf renewable energy ka process slow hoga balkay awam par mazed financial burden bhi padega.

Is ke ilawa public hearing mein limited aur restricted participation ka amal bhi shaffafiyat par sawal uthata hai. Itni important policy ke liye wider public consultation zaroori thi.

Main NEPRA se pur-zor guzarish karta hoon ke:

1. Existing net metering consumers ko new Net Billing Policy se exempt kiya jaye.
2. Old licensees ke liye pehlay se approved terms aur rates ko system ki life tak barqarar rakha jaye.
3. Is policy ko broader public aur stakeholders se proper mashwaray ke baad dobara review kiya jaye.

Pakistan ko is waqt renewable energy ko promote karne ki zaroorat hai, discourage karne ki nahi. Umeed hai NEPRA public interest aur consumers ke haq mein is faistlay par dobara ghour kare gi.

Shukriya.

Sincerely,
M Anosh Shaheen
Islamabad
0316-8547467

Forwarded please:

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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (E/Proc)

For kind information, please,
Chairman 2. M (Tech)
S. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 780
Date: 13.1.26

CHAIRMAN
DY No: 277
Date: 09.01.26

Chairman NEPRA

From: Muhammad Yaseen Khalid <muhammadyaseenkhalid@gmail.com>
Sent: Friday, January 9, 2026 11:36 AM
To: cad@nepra.org.pk; Chairman@nepra.org.pk

Respected Chairman / Registrar NEPRA,

I am writing to formally register my strong objection to the proposed Net Billing Policy scheduled to take effect from 14 January 2026, as published on NEPRA's website.

This policy effectively ends net metering and applies retrospectively to existing licensees, which is deeply unfair and against the legitimate expectations of consumers who invested in solar systems under the existing Net Metering Regulations. These investments were made in good faith, based on long-term policy stability promised by the regulator.

While the proposed purchase rate of Rs. 27/unit for existing users is noted, the overall shift from net metering to net billing will significantly reduce the economic viability of installed systems and undermine consumer confidence in future renewable energy initiatives.

I would like to highlight the following concerns:

Retrospective application of the policy to existing net metering consumers is unjust and should not be allowed.

Limited and restricted public participation in the hearing process does not reflect transparent regulatory practice.

Such abrupt policy changes discourage renewable energy adoption and private investment.

The proposed rate of Rs. 11.5/unit for new consumers is unviable and will stall rooftop solar growth in Pakistan.

Registrar

Forwarded please:

<input checked="" type="checkbox"/> For Rec. action	<input type="checkbox"/> For information
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<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input checked="" type="checkbox"/> ADG (Trt)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input checked="" type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/Reg)

For kind information, please.

☒ Chairman 2. M (Tech)
☒ M (Law) 1. M (Dev)

13-01-26

REGISTRAR OFFICE
Dy No: 759
Date: 13.1.26

CHAIRMAN
Dy No: 276
Date: 09-1-26

Chairman NEPRA

Forwarded please:	
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<input type="checkbox"/> DG (Compl.)	<input type="checkbox"/> DG (Public Affs)

13-01-26

From: Tallha Ashraf <tallhaashraf313@gmail.com>
Sent: Friday, January 9, 2026 12:43 PM
To: cad@nepra.org.pk; Registrar@nepra.org.pk; Chairman@nepra.org.pk
Subject: ✓ PROTEST: Objections to the Proposed Net Billing Policy and Retrospective Amendment of Net Metering Regulations

For kind information, please,

1. Chairman 2. M (Tech.)

3. M (Finance) 4. M (Legal)

5. M (Reg.) 6. M (Public Affs)

7. M (IT) 8. M (Compl.)

9. M (Admin/HR) 10. M (AFC)

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461. M (DG) 462. M (Public Affs)

Yours sincerely,

Tallha Ashraf
Sabzazar, Lahore,
0300-5557725

Chairman NEPRA

From: Sohaib Jamal <sohaibjamal543@gmail.com>
Sent: Friday, January 9, 2026 1:26 PM
To: Chairman@nepra.org.pk; info@pmo.gov.pk; info@nitb.gov.pk; feedback@pmo.gov.pk
Subject: As a Pakistani citizen i record my voice to government of pakistan

Salam

As a Pakistani main pakistan ke city rawalpindi main rehta hon aur yahan per rehne ke liye law aur qanon lehta hy ke mujhy basic needs provide kerna government ke responsibilities hein taken afosoos ke sath na sirf humay yah huq milta hy uper se hum per new kalay qanoon laga ker lota jata hy main ek gover Employee hon jiske salary sirf 70 thousand hu jis main apni family becho apnay old maa baap ko paal raha hon us per mujhy har saal ek huge amount bills pay kerna parhte thay jo ke pay main karon aur free electricity humaray khukmarn khaa jeay main ny apni biwi ka gold bech ker solar lagaya aur es azaab se bechna cahah Investment meri zameen meri har cheez meri us per apke new net metering policy zulm nahi hum logo ka qatal hy be zameer khukmaran aur unke ek Department ke head honne ke natay ap bhi eska hissa hy khuda ke liye hum logo ko kuch de nahi sekhte tu humay saans lene ka huq tu dein guzarish hy ke es new law ko khatam kya jeey hum Request ke elawa kuch nahi ker sekhte

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
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<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (AFI)
<input checked="" type="checkbox"/> ADG (Inf)	<input type="checkbox"/> DG (Fin)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Sec. D.D.
<input checked="" type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (Law)

For kind information, please:
1. Chairman 2. M (Tech)
3. SA (Law) 4. M (Dev)

13-1-26

Registrar

REGISTRAR OFFICE
Diary No. 763
Date: 13-1-26

CHAIRMAN
Dy No. 280
Date: 09-1-26

NEPRA
Licencing Department
Diary No. 324
Date: 14-1-26

Chairman NEPRA

From: Ali Abbas <maliabbas0009@gmail.com>
Sent: Friday, January 9, 2026 2:04 PM
To: Chairman@nepra.org.pk
Subject: Protests against NEPRA's new net metering policy.

I Protests against NEPRA's proposed shift from net metering to net billing/ gross metering for rooftop solar.

Registrar

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (I.C.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIBCM)

For kind information, please.

☒ Chairman ☒ M (Tech)
☒ M (Law) ☒ M (Dev)

13-01-26

REGISTRAR OFFICE
Diary No. 764
Date: 13.1.26

CHAIRMAN
Diary No. 281
Date: 09-01-26

NEPRA
Licensing Department
Diary No. 325
Date: 14-1-26

Chairman NEPRA

From: Syed Zahid Ahmad <ahmad245@gmail.com>
Sent: Friday, January 9, 2026 2:34 PM
To: cad@nepra.org.pk; chairman@nepra.org.pk; registrar@nepra.org.pk
Subject: Protest against Net billing Policy NEPRA

Subject: Formal Protest against Proposed Net Billing Policy (NEPRA)

Respected Registrar / Chairman NEPRA,

I am writing to express my strong reservations and formal protest regarding the proposed transition from Net Metering to Net Billing, scheduled for implementation from January 14, 2026.

The retroactive application of this policy to existing licensees is a breach of trust and a violation of the contractual agreements made at the time of installation. The proposed buyback rates (Rs. 27 for old users and Rs. 11.5 for new users) significantly undermine the financial viability of solar investments, especially when electricity prices are soaring.

I request NEPRA to:

Withdraw the Net Billing proposal and maintain the current Net Metering system.

At the very least, exempt existing users from this change to honor the original terms of their license.

We look forward to a decision that protects the consumer and encourages renewable energy in Pakistan.

please have mercy on honest and taxpayers Pakistani citizens. We are already under a huge financial burden of inflation and other high rates on commodities.

Regards,

Many thanks and Best Regards.

(Syed Zahid Ahmad)
Cell No: +92-321-5075004
ISLAMABAD, PAKISTAN.

Forwarded please.

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Int.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 262
Date: 13.1.26

CHAIRMAN
282
Diary No: 09-1-26
Date: 09-1-26

Chairman NEPRA

From: Ali Abbas <maliabbas0009@gmail.com>
Sent: Friday, January 9, 2026 2:04 PM
To: Chairman@nepra.org.pk
Subject: Protests against NEPRA's new net metering policy.

I Protests against NEPRA's proposed shift from **net metering to net billing/ gross metering for rooftop solar.**

Registrar

Forwarded please:

<input checked="" type="checkbox"/> For new action	<input type="checkbox"/> For information
<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T.)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECON)

For kind information, please:

☒ Chairman ☐ M (Tech)
☒ M (Law) ☒ M (Dev)

13-01-26

REGISTRAR OFFICE
Diary No. 764
Date: 13.1.26

CHAIRMAN
Diary No. 281
Date: 09-01-26

Chairman NEPRA

From: Arif Bilal <mabilal58@live.com>
Sent: Friday, January 9, 2026 9:39 AM
To: Chairman@nepra.org.pk
Subject: Formal Protest against Proposed Net Billing Policy (NEPRA)

Respected Registrar / Chairman NEPRA,

I am writing to express my strong reservations and formal protest regarding the proposed transition from Net Metering to Net Billing, scheduled for implementation from January 14, 2026.

The retroactive application of this policy to existing licensees is a breach of trust and a violation of the contractual agreements made at the time of installation. The proposed buyback rates (Rs. 27 for old users and Rs. 11.5 for new users) significantly undermine the financial viability of solar investments, especially when electricity prices are soaring.

I request NEPRA to:

Withdraw the Net Billing proposal and maintain the current Net Metering system.

At the very least, exempt existing users from this change to honor the original terms of their license.

We look forward to a decision that protects the consumer and encourages renewable energy in Pakistan.

Regards,

Muhammad Arif Bilal

Reference Number:11143573556402

City: Islamabad

Sent from my iPhone

Forwarded please:

☒ For rec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/R)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AFC)
<input type="checkbox"/> ADG (Inf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (C.I)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

REGISTRAR OFFICE
Diary No. 274
Date: 13.1.26

CHAIRMAN
Dy No. 274
Date: 09-1-26

Chairman NEPRA

From: attorneyabid@icloud.com
Sent: Thursday, January 8, 2026 9:19 PM
To: Chairman@nepra.org.pk
Subject: Objections to Proposed Net Billing Policy - Request for Exemption of Existing Net-Metering Licensees

Forwarded please:	
<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
<input type="checkbox"/> DG (Ec.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> ELA	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Dir. (LT)
For kind information, please.	
<input type="checkbox"/> Chairman	<input type="checkbox"/> 2. M (Tech)

To:

The Registrar

National Electric Power Regulatory Authority (NEPRA)

Islamabad

Registrar

Respectfully submitted:

1. That the undersigned consumer objects to the proposed Net Billing Policy, particularly its application to existing net-metering licensees, which amounts to retrospective deprivation of vested rights.
2. That existing net-metering consumers made substantial capital investments in reliance upon a clear regulatory framework approved and promoted by NEPRA itself. Any unilateral alteration mid-stream violates the settled doctrines of legitimate expectation, promissory estoppel, and regulatory certainty.
3. That the proposed differential purchase rates—Rs. 27/unit for existing users and Rs. 11.5/unit for new users are arbitrary, confiscatory, and bear no rational nexus to, avoided fuel costs; reduced transmission losses; peak load shaving; or foreign exchange savings.
4. That the so-called public hearing was conducted with restricted and selective participation, defeating the spirit of transparent stakeholder consultation required of an independent regulator.
5. That rooftop solar is not a luxury but a consumer response to systemic grid failure, excessive tariffs, and load uncertainty, and penalising it will discourage future renewable adoption; increase grid stress, and; undermine Pakistan's climate and energy security commitments.

PRAYER

It is therefore respectfully requested that NEPRA:

a) Fully exempt existing net-metering licensees from the proposed Net Billing Policy for the life of their systems;

CHAIRMAN

260

Dy No.

Date: 09-01-26

335
14-1-26

REGISTRAR OFFICE
Dy No: 243
Date: 13-1-26

- b) Apply any revised framework prospectively only, after meaningful consultation;
and
- c) Reconsider buy-back rates on a cost-reflective and non-punitive basis.

Any policy imposed without addressing these concerns shall remain vulnerable to legal challenge.

Abid Hussain
Advocate High Court
Islamabad.

Sent from my iPhone

Chairman NEPRA

From: Ahsen Ali <ahsen9pk@gmail.com>
Sent: Thursday, January 8, 2026 9:59 PM
To: registrar@nepra.org.pk
Cc: Chairman@nepra.org.pk
Subject: Submission of Detailed Comments / Objections on Draft NEPRA (Prosumer) Regulations, 2025 – Pursuant to Public Notice and Section 47(3) of NEPRA Act, 1997
Attachments: Detailed Written Comments with Objections on Draft NEPRA (Prosumer) Regulations, 2025.pdf; Nepra Ad.jpeg

Forwarded please:
☒ For no action ☐ For information

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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (AIG/HR)

For kind information, please:
☒ Chairman ☐ 2. M (Tech)
☒ M (Law) ☒ M (Dev)

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
NEPRA Tower, Attaturk Avenue (East), G-5/1
Islamabad

Respected Sir,

With reference to the **Public Notice issued by the National Electric Power Regulatory Authority regarding the publication of the Draft NEPRA (Prosumer) Regulations, 2025** for eliciting public opinion, in exercise of powers under **Section 47(3) of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997**, I hereby submit my **detailed written comments, objections, and recommendations** within the stipulated period of thirty (30) days.

The enclosed submission contains a **comprehensive, regulation-wise analysis** of the Draft Regulations, including:

- Legal and constitutional objections**, based on settled principles of administrative law and binding judgments of the **Honourable Supreme Court of Pakistan and High Courts**;
- Technical objections**, particularly addressing the fundamental misconception between DC module ratings and actual AC power injected into the grid, and proposing the internationally accepted concept of **Approved Export Capacity (AEC)** at the Point of Common Coupling (PCC);
- Economic and contractual concerns**, especially the impairment of vested rights and executed agreements under the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015;
- Comparative regulatory analysis**, highlighting discriminatory treatment between prosumers and Independent Power Producers (IPPs), despite both being private investors supplying electricity to the national grid; and
- Proposed corrective drafting**, including precise amendments and alternative clauses to ensure legality, predictability, grid safety, and investor confidence.

It is respectfully emphasized that the Draft Regulations, in their present form, raise serious issues of **retrospective application, excessive administrative discretion, lack of due process, and constitutional infirmities**, which—if not addressed at this consultative stage—may lead to avoidable disputes and litigation, undermining regulatory certainty and public confidence.

This submission is made **strictly in response to the published draft**, without prejudice to any legal rights or remedies available under the Constitution and law.

CHAIRMAN
By No. 261
Date: 09-01-26
Registrar

Received by Registrar
Date: 14-1-26

RECEIVED BY REGISTRAR
Diary No: 744
Date: 13-1-26

You are respectfully requested to place this submission on record, consider it during the consultative and deliberative process mandated by Section 47 of the NEPRA Act. and acknowledge its receipt.

I have also sent a hard copy of this letter along with Detailed Written Comments / Objections on Draft NEPRA (Prosumer) Regulations, 2025 to your mailing address.

Thanking you.

Yours faithfully,

Engr. Dr. Muhammad Ahsen Ali
(Ph. D. Electrical Engineering)

Professional Engineer (Pakistan Engineering Council)
(Elect/28241, Electrical (Power))

Ex- S.E, Chashma Nuclear Power Generating Station Unit-1
(Pakistan Atomic Energy Commission)

Chief Operation Officer (COO)
Shahzad Solar (Private) Limited
160-A, Sheikh Colony, Jhang Road Faisalabad

CNIC: 33100-8212778-1

Contact No.: +92342-2334444

Email: ahsen9pk@gmail.com

Enclosure:

Detailed Written Comments / Objections on Draft NEPRA (Prosumer) Regulations. 2025

Chairman NEPRA

From: Bilal Chaudhry <bilal.chaudhry@baltoro.io>
Sent: Friday, January 9, 2026 1:39 AM
To: registrar@nepra.org.pk; Chairman@nepra.org.pk; cad@nepra.org.pk
Subject: Formal Protest Against Proposed NEPRA (Prosumer) Regulations, 2025 – Demand to Fully Exempt Existing Net Metering Consumers

Dear Registrar and Chairman NEPRA,

I am writing to formally record my strong objection to the draft NEPRA (Prosumer) Regulations, 2025, which propose replacing the existing Net Metering framework with a Net Billing mechanism.

As an existing net metering licensee under the 2015 Regulations, I made substantial investments in solar generation based on the prevailing 1:1 offset at retail tariff rates and a reasonable payback period. The proposed shift to Net Billing billing imports at full retail tariff while crediting exports at a significantly lower rate (around Rs. 11-13 per unit for new users) constitutes a retroactive alteration if applied to existing consumers upon contract expiry or otherwise.

Applying these changes to existing licensees undermines legitimate expectations, causes severe financial detriment to investors who relied on the original policy, and risks eroding public trust in renewable energy incentives.

Moreover, the rapid growth of Pakistan's solar industry including manufacturing, installation, and related jobs depends heavily on the stability of the existing Net Metering policy for current users. Any retroactive or transitional application threatens the sector's viability, leading to reduced investments and potential job losses.

I strongly urge NEPRA to:

1. Fully exempt all existing net metering consumers from the new Prosumer Regulations, allowing them to continue indefinitely under the 2015 Net Metering framework.
2. Reject any reduction in export credits or shift to Net Billing for pre-existing installations.
3. Ensure inclusive stakeholder consultation before finalizing the regulations.

Please record this as formal comments in opposition to the draft. Failure to protect existing investments will discourage future renewable adoption and harm Pakistan's clean energy goals.

Thank you for considering this submission.

Sincerely,
Bilal Chaudhry
Sargodha, Pakistan
Date: January 09, 2026

Forwarded please:

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<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/RCM)

For kind information, please,
1. Chairman 2. M (Tech)
1. M (Law) 1. M (Dev)

REGISTRAR OFFICE
Diary No. 251
Date: 13.1.26

CHAIRMAN
Diary No. 268
Date: 09.01.26

Chairman NEPRA

From: #saif_afridi <saifkhanafridi009@gmail.com>
Sent: Thursday, January 8, 2026 11:05 PM
To: Chairman@nepra.org.pk
Subject: Complaint Regarding Suspension of Net Metering and Pending Applications

Respected Sir/Madam,

I am writing to formally lodge a complaint regarding the sudden suspension of the net metering process and the complete halt in processing pending net metering cases.

It has been observed that new net metering approvals have been stopped, and applications that were already submitted and are pending at different stages have also not been processed further. This situation has caused serious concern and financial distress to consumers who have already invested heavily in solar energy systems based on the existing net metering policy.

Many applicants have completed all required documentation, inspections, and installations, yet their cases remain unresolved without any clear timeline or official communication. This lack of transparency and delay is discouraging the adoption of renewable energy and is adversely affecting public trust.

I respectfully request NEPRA to kindly look into this matter urgently, issue clear directions to the concerned DISCOs, and ensure that pending net metering applications are processed without further delay. Additionally, an official clarification regarding the future of net metering would be highly appreciated.

I shall be grateful for your prompt attention to this matter.

Your sincerely

M Safi ullah

03024008249

Registrar

Forwarded please:

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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (Reg.M)

For kind information, please,

<input checked="" type="checkbox"/> 1. Chairman	<input type="checkbox"/> 2. M (Tech)
<input checked="" type="checkbox"/> 3. M (Law)	<input type="checkbox"/> 4. M (Dev)

REGISTRAR OFFICE
Diary No: 748
Date: 13.1.26

CHAIRMAN
DY No: 265
Date: 09-01-26

Chairman NEPRA

From: Dr Mushtaq Gilani <gilani.m@gmail.com>
Sent: Thursday, January 8, 2026 11:22 PM
To: Chairman@nepra.org.pk
Subject: Formal Protest against Proposed Net Billing Policy (NEPRA)

Chairman NEPRA,

I am writing to express my strong reservations and formal protest regarding the proposed transition from Net Metering to Net Billing, scheduled for implementation from January 14, 2026.

The retroactive application of this policy to existing licensees is a breach of trust and a violation of the contractual agreements made at the time of installation. The proposed buyback rates (Rs. 27 for old users and Rs. 11.5 for new users) significantly undermine the financial viability of solar investments, especially when electricity prices are soaring.

I request NEPRA to:

1. **Withdraw** the Net Billing proposal and maintain the current Net Metering system.
2. At the very least, **exempt existing users** from this change to honor the original terms of their license.

We look forward to a decision that protects the consumer and encourages renewable energy in Pakistan.

Regards,

Dr. Syed Mushtaq Gilani

CNIC: 13101-0829544-7

ISLAMABAD

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information, please:

<input checked="" type="checkbox"/> Chairman	<input type="checkbox"/> 2. M (Tech)
<input checked="" type="checkbox"/> 3. M (Law)	<input checked="" type="checkbox"/> 4. M (Dev)

REGISTRAR OFFICE
Diary No: 349
Date: 13-1-26

CHAIRMAN
Dy No: 266
Date: 09-01-26

Registrar

339
14-1-26

Chairman NEPRA

From: Muhammad Waheed <aaripiara@gmail.com>
Sent: Thursday, January 8, 2026 10:54 PM
To: Chairman@nepra.org.pk
Subject: Effect of new net billing policy

Sir old consumers will not sit back as they must should have to complete their 7 years licensing period with old existing policy

For new consumers with export rate of just 11 is just a joke why?

1:: A 10Kw ongrid system usually costs 9 lacs and generates 1000 average units per month mean consumer will get only 11000 rupees benefit for one month .

2 ::11000rupees per month mean 110,000rupees for one year and 550,000 rupees in 5 years as net billing license will be expired after 5 years mean consumer will get benefit of 550000 which is 350000 to 4 lac less then his solar investment which was 9 to 950 lacs .

3:: solar users will divert to hybrid system with lithium power full batteries ongrid system will die invensioly .

4:: Due to shortage of rains or water in dams in April to June months reaches to dead level then only strong and cheap electricity is provided by ongrid solar system exported to grid.

Forwarded please:

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<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/P/CM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

REGISTRAR OFFICE
Diary No. 747
Date: 13.1.26

CHAIRMAN
By No. 264
Date: 09-01-26

Chairman NEPRA

From: Muhammad Waheed <aariipara@gmail.com>
Sent: Thursday, January 8, 2026 10:51 PM
To: Chairman@nepra.org.pk
Subject: New Net billing policy and it's effects on consumer and wapda

Sir old consumers will not sit back as they must should have to complete their 7 years licensing period with old existing policy

For new consumers with export rate of just 11 is just a joke why?

1::: A 10Kw ongrid system usually costs 9 lacs and generates 1000 average units mean consumer will get only 11000 rupees benefit for one month

2 ::: 11000 per month mean 110,000 for one year and 550,000 rupees in 5 years as net billing license will be expired after 5 years mean consumer will get benefit of 550000 which is 350000 to 4 lac less then his solar investment which was 9 to 950 lacs

3:: solar users will divert to hybrid system with lithium power full batteries ongrid system will die insensiooly

4:: Due to shortage of rains or water in dams in April to June months reaches to dead level then only strong and cheep electricity is provided by ongrid solar system exported to grid.

Forwarded please:

☒ For nec. action ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Economic)

For kind information, please.

☒ Chairman ☒ M (Tech)
☒ M (Law) ☒ M (Dev)

Registrar

REGISTRAR OFFICE
Diary No: 246
Date: 13.1.26

CHAIRMAN
DY No: 263
Date: 09-01-26

Chairman NEPA

From: TieRays Solar Energy <tierayzsolar@gmail.com>
Sent: Thursday, January 8, 2026 10:50 PM
To: cad@nepra.org.pk; Chairman@nepra.org.pk; registrar@nepra.org.pk
Subject: Objection to Proposed Net Billing Policy for Existing & New Consumers

Dear Sir,

I would like to strongly object to the proposed Net Billing Policy replacing the current Net Metering system.

This policy will negatively affect both existing and new solar consumers. Existing users invested under the Net Metering framework in good faith, while the proposed low purchase rate for new consumers will discourage future solar adoption in Pakistan.

I respectfully request NEPA to:

- Exempt existing Net Metering users from the new policy, and
- Reconsider and revise the proposed purchase rate for new consumers.

Kindly protect consumer confidence and support sustainable renewable energy growth.

Regards,
CEO TieRays Solar Energy (Mansoor Khan)

Forwarded please:

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

REGISTRAR OFFICE
Diary No: 743
Date: 13.1.26

CHAIRMAN
262
DY No: 09-01-26
Date:

NEPA
Licensing Department
Diary No: 342
Date: 14-1-26

Chairman NEPRA

From: Asad Ali <asadthisside@gmail.com>
Sent: Friday, January 9, 2026 2:18 AM
To: cad@nepra.org.pk; Registrar@nepra.org.pk; Chairman@nepra.org.pk
Subject: COMMENTS ON NEPRA (Prosumer) Regulations, 2025

For production		For information	
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For kind information, please,
Chairman, Z. M (Tech)

PUBLIC COMMENTS ON

NEPRA (Prosumer) Regulations, 2025

Submitted by: An Individual Household Prosumer

Registrar

CHAIRMAN
By No. 269
Date: 09-01-26

1. Background

I am a household consumer who installed a rooftop solar system after investing a substantial amount of personal savings, running into **millions of rupees**, based on the Government of Pakistan's stated policy to encourage renewable energy and net metering.

This investment was made in good faith with the understanding that:

- solar would reduce my long-term electricity bills,
- excess electricity exported to the grid would be fairly valued, and
- the regulatory framework would remain stable and predictable over time.

REGISTRAR OFFICE
Diary No: 252
Date: 13-1-26

The proposed revisions to the Prosumer Regulations undermine these assumptions and place an unfair burden on individual households.

2. Unfair Reduction of Buy-Back Rates

Under the proposed regulations, the rate at which electricity exported by household solar systems is purchased can be reduced unilaterally by the regulator during the life of the agreement.

For an individual household:

- this removes any certainty of cost recovery,
- makes long-term financial planning impossible, and
- converts a family investment into a high-risk gamble.

Household solar systems are not speculative ventures; they are **long-term household infrastructure investments**. Changing the buy-back rate after installation is fundamentally unfair.

3. Violation of Trust and Legitimate Expectation

Households invested in rooftop solar because the government actively promoted renewable energy and net metering. Many families took loans or diverted life savings to install these systems.

Changing the rules after citizens have already invested:

- breaks public trust,
- violates the reasonable expectation that government policies will not be altered to the sole disadvantage of citizens,
- discourages future households from adopting clean energy.

A policy that penalizes early adopters sends the wrong signal to the public.

4. One-Sided Risk Allocation

Under the proposed framework:

- households bear **all capital, maintenance, and compliance costs**,
- distribution companies can limit or curtail exports,
- yet households have no protection against tariff reductions or revenue uncertainty.

This creates a one-sided arrangement where:

- the household carries all financial risk,
- the utility and the government face none.

Such imbalance is unjust for ordinary consumers.

5. Impact on Middle-Income Families

Most household prosumers are **not wealthy investors**. They are middle-income families trying to:

- protect themselves from rising electricity tariffs,
- reduce load-shedding exposure,
- contribute to environmental sustainability.

Lowering buy-back rates after installation directly harms families who acted responsibly and in line with national policy.

6. Lack of Transparency

No clear explanation has been provided to household consumers regarding:

- how export rates were determined,
- whether savings from reduced fuel imports were considered,
- how rooftop solar benefits the grid during peak daylight hours.

Without a transparent and publicly shared analysis, these changes appear arbitrary and unfair.

7. Respectful Requests and Recommendations

I respectfully request that NEPRA and the Government of Pakistan consider the following:

1. **Protect Existing Household Prosumers** All households with installed or approved solar systems should be fully protected under the terms that existed at the time of installation.
2. **No Mid-Term Changes to Buy-Back Rates** Buy-back rates should remain fixed for the full agreement period to allow families to recover their investment.

3. **Fair and Transparent Valuation**Exported solar electricity should be valued fairly, considering fuel savings, reduced grid losses, and environmental benefits.
4. **Clear Policy for Future Installations Only**If changes are necessary, they should apply only to **future applicants**, with full disclosure before installation.

8. Conclusion

Household solar systems represent trust in government policy and commitment to national energy goals. Policies that retrospectively reduce benefits undermine that trust and discourage responsible citizen participation in clean energy.

I respectfully urge NEPRA to revise the proposed regulations to ensure **fairness, predictability, and protection for household prosumers** who invested in good faith.

Chairman NEPRA

From: RenewableEngineeringSolutions <info.ressolar@gmail.com>
Sent: Friday, January 9, 2026 7:03 AM
To: cad@nepra.org.pk
Cc: chairman@nepra.org.pk
Subject: Strong Objection to Proposed Net Billing Policy and Request for Protection of Existing Net Metering Consumers

To
The Chairman
National Electric Power Regulatory Authority (NEPRA)
Islamabad, Pakistan

Registrar

REGISTRAR OFFICE
Diary No: 733
Date: 13.1.26

Subject: Strong Objection to Proposed Net Billing Policy and Request for Protection of Existing Net Metering Consumers

Respected Sir,

I am writing to express my serious concern and strong objection to NEPRA's proposed Net Billing Policy, scheduled to be implemented with effect from 14 January 2026, as published on NEPRA's website.

The proposed policy effectively ends Net Metering and replaces it with a Net Billing mechanism that is financially detrimental to electricity consumers who invested in renewable energy in good faith, based on the existing regulatory framework. The drastic reduction in the purchase rate—Rs. 11.5 per unit for new consumers and Rs. 27 per unit for existing consumers—fundamentally alters the economic viability of solar investments.

Thousands of consumers installed solar systems after making long-term financial commitments, relying on NEPRA-approved Net Metering regulations, approved payback periods, and government encouragement of renewable energy. Retrospective application of this policy to existing licensees is unjust, violates legitimate consumer expectations, and severely undermines investor confidence in Pakistan's renewable energy sector.

Additionally, the public hearing process for this policy was conducted with restricted participation, which limited meaningful consumer representation. Such a significant policy shift warrants broad, transparent, and inclusive stakeholder consultation.

This policy will:

- * Penalize early adopters of clean energy
- * Discourage future investment in renewable generation
- * Increase financial burden on middle-income households
- * Damage trust in regulatory stability
- * Contradict national goals of energy sustainability and climate resilience

In light of the above, I respectfully request NEPRA to:

Forwarded please:

☒ For nec. action ☐ For information

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<input type="checkbox"/> PSA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (C/RCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN
Dy No: 270
Date: 09-01-26

1. Completely exempt all existing Net Metering consumers from the proposed Net Billing Policy
2. Apply any new framework only to future applicants, with adequate transition time
3. Re-conduct public hearings with open and meaningful consumer participation
4. Publish a transparent financial and economic justification for the proposed rates

I urge NEPRA to reconsider this policy in the larger national interest and protect consumers who acted responsibly and in accordance with prevailing laws and regulations.

I hope NEPRA will uphold fairness, regulatory consistency, and consumer confidence.

Yours sincerely,

Engr Atif

City: Islamabad

Contact: +92316-5680196

Chairman NEPRA

From: AQEEL AFZAL <m.aqans@outlook.com>
Sent: Friday, January 9, 2026 9:01 AM
To: chairman@nepra.org.pk
Subject: Objection to Discontinuation of Net Metering Policy

Respected Chairman NEPRA,

I'm writing to express my strong objection to NEPRA's decision to discontinue Net Metering and introduce the Net Billing Policy from January 14, 2026. This change will harm consumers and undermine Pakistan's renewable energy goals.

As a consumer who invested in solar based on NEPRA's policy, I urge you to:

- Keep the existing Net Metering policy for current consumers
- Maintain the purchase rate at Rs. 27/unit, not Rs. 11.5/unit
- Conduct a transparent consultation process with stakeholders

This decision needs reconsideration to protect consumers and promote renewable energy.

Sincerely,
Aqeel Afzal

Forwarded please:

☒ For nec. action ☐ For information

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

REGISTRAR OFFICE
Diary No: 216
Date: 13.1.26

CHAIRMAN
By No. 273
Date: 09-01-26

Chairman NEPRA
Diary No: 345
Date: 14-1-26

Chairman NEPRA

From: Fazle Azeem <aahhazeem@gmail.com>
Sent: Friday, January 9, 2026 8:19 AM
To: Chairman@nepra.org.pk
Subject: Change in Net metering policy

It is humbly requested that a new draft of the stated policy is likely to be implemented soon with the main theme to bring down the price of buying units from solar energy producers. It is requested that contractual terms may kindly be respected and benefits as per the initial old contract may be continued to the solar energy producers at residential level. It is worth mentioning that a huge⁸⁸⁸ amount has been spent on these assets.

Regards
Fazliazim

Registrar

Forwarded please:

☒ For p.c. action ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (eProc)

For kind information, please.

1. Chairman 2. M (Tech.)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 224
Date: 13.1.26

NEPRA
Licensing Department
Diary No: 346
Date: 14-1-26

CHAIRMAN
Diary No: 271
Date: 09-01-26

Chairman NEPRA

From: Afzaal Ansari <afzaliqbal688@gmail.com>
Sent: Friday, January 9, 2026 8:41 AM
To: Chairman@nepra.org.pk

Net policy 11.5 is not good

Registrar

Forwarded please:

☒ For neg. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 233
Date: 13.1.26

CHAIRMAN
Dy No: 272
Date: 09-1-26

Diary No: 347
Date: 14-1-26

Chairman NEPRA

From: Muzammil Malik <muzammilmk2010@gmail.com>
Sent: Thursday, January 8, 2026 7:36 PM
To: Chairman@nepra.org.pk
Subject: Objection to Proposed Net Billing Policy

Dear Sir/Madam

I am writing to formally register my strong objection and concern regarding the proposed Net Billing Policy, which is expected to replace the existing Net Metering system with effect from 14 January 2026.

The proposed policy, particularly the significant reduction in the electricity purchase rate for new consumers and the uncertainty for existing net metering users, will severely impact thousands of households and small businesses who invested heavily in solar energy under the assurance of the current net metering framework. Such a sudden policy shift undermines consumer confidence and discourages future investment in renewable energy, which contradicts national energy sustainability goals.

Furthermore, it is concerning that the public hearing on this policy was conducted with limited participation, leaving many stakeholders unheard. Existing net metering users made long-term financial commitments based on the prevailing policy, and applying the new net billing mechanism to them would be unjust and economically damaging.

I respectfully request NEPRA to:

Reconsider the proposed Net Billing Policy

Exempt existing net metering consumers from this change, or

Conduct broader and transparent stakeholder consultations before final implementation

I urge NEPRA to take public interest into account and ensure a fair, transparent, and sustainable energy policy.

Thank you for your time and consideration.

Yours sincerely,
Muzammil Malik

Registrar

Forwarded please

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIB/IR)

For kind information, please,
1. Chairman
2. M (Tech)
3. M (Law)
4. M (Dev)

REGISTRAR OFFICE
Diary No: 241
Date: 13.1.26

CHAIRMAN
By No: 258
Date: 09-1-26

Chairman NEPRA

From: Haji Ramzan <hajiramzan906786@gmail.com>
Sent: Thursday, January 8, 2026 11:47 PM
To: Chairman@nepra.org.pk
Subject: What is this?
Attachments: 1000207219.jpg; 1000207222.jpg

Forwarded please:

☒ For nec. action ☒ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Public Affs)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

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REGISTRAR OFFICE
Diary No: 216
Date: 13-1-26

CHAIRMAN
By No. 267
Date: 09-01-26

NEPRA
User: 350
14-1-26



SHORE LINE TRIC SUPPLY COMPANY

Office of the Chief Executive Officer (LSCC)

Government of Punjab

Head Office, Lahore

SUB: NON ENTERTAINMENT OF NEW NET METERING APPLICATIONS

REF: NEPRA/2024/1100677/2024/11/12

It is submitted that LSCC has not stopped the registration of new net metering applications. Consumers are applying through the newly developed LSCC Net Metering Portal and applications are being processed and the registration number is being issued. The registration is available online for consumers.

Chief Executive Officer
LSCC

To:
Director General
Consumer Affairs Department
NEPRA.

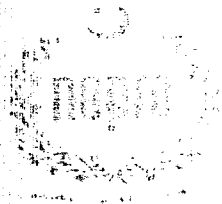
Attention: Accounts Section-8 Islamabad

Info:

1. O/M / Operation Director LSCC
2. Customer Services Director LSCC
3. Chief IT Officer LSCC
4. Master file

No. 5536577-CLC

Dated: 29/12/2025



National Electric Power Regulatory Authority
ISLAMIC REPUBLIC OF PAKISTAN
NEPRA TOWER
Altatark Avenue (East) Sector G-5/1, Islamabad.
Ph: 051-2013200, Fax: 051-2600021

Consumer Affairs
Department

TCD.10/ ⁵⁶³⁴ .2025
December 24, 2025

- 1) Chief Executive Officer, Faisalabad Electric Supply Company Limited (FESCO), Faisalabad.
- 2) Chief Executive Officer, Gujranwala Electric Power Company Limited (GEPCO), Gujranwala.
- 3) Chief Executive Officer, Hazara Electric Supply Company Limited (HAZECO), Abbottabad.
- 4) Chief Executive Officer, Hyderabad Electric Supply Company Limited (HESCO), Hyderabad.
- 5) Chief Executive Officer, Islamabad Electric Supply Company (IESCO), Islamabad.
- 6) Chief Executive Officer, Lahore Electric Supply Company Limited (LESCO), Lahore.
- 7) Chief Executive Officer, Multan Electric Power Company Limited (MEPCO), Multan.
- 8) Chief Executive Officer, Peshawar Electric Supply Company Limited (PESCO), Peshawar.
- 9) Chief Executive Officer, Quetta Electric Supply Company Limited (QESCO), Quetta.
- 10) Chief Executive Officer, Sukkur Electric Power Company Limited (SEPCO), Sukkur.
- 11) Chief Executive Officer, Tribal Electric Supply Company Limited (TESCO), Peshawar.
- 12) Chief Executive Officer, K Electric Limited (KEL), Karachi.

MOST IMMEDIATE
FAX MESSAGE

Subject: **NON ENTERTAINMENT OF NEW NET METERING APPLICATIONS**
Misc. 41/12, 2025

It has come to the notice of the Authority that a number of DISCOs have stopped registration of new net metering applications within their respective jurisdictions. The matter is of a serious concern and is in violation of applicable documents.

2. Foregoing in view, all the DISCOs are directed to submit a detailed report **within three (03) working days**, positively. This matter shall be treated as **Most Urgent**

(Naweed Illahi Sheikh)
Director General

Head of Consumer Affairs Deptt

Copy to:

- 1) CSD, Faisalabad Electric Supply Company Limited (FESCO), Faisalabad.
- 2) CSD, Gujranwala Electric Power Company Limited (GEPCO), Gujranwala.
- 3) CSD, Hazara Electric Supply Company Limited (HAZECO), Abbottabad.
- 4) CSD, Hyderabad Electric Supply Company Limited (HESCO), Hyderabad.
- 5) CSD, Islamabad Electric Supply Company (IESCO), Islamabad.
- 6) CSD, Lahore Electric Supply Company Limited (LESCO), Lahore.
- 7) CSD, Multan Electric Power Company Limited (MEPCO), Multan.
- 8) CSD, Peshawar Electric Supply Company Limited (PESCO), Peshawar.
- 9) CSD, Quetta Electric Supply Company Limited (QESCO), Quetta.
- 10) CSD, Sukkur Electric Power Company Limited (SEPCO), Sukkur.
- 11) CSD, Tribal Electric Supply Company Limited (TESCO), Peshawar.
- 12) Mr. M. Imran Hussain Qureshi, Chief Regulatory Affairs & Govt. Relations Officer,
K Electric Limited Office, 56 A, Street No. 88, G-6/3, Islamabad.
- 13) All NEPRA Regional Offices - (for follow-up with concerned DISCOs)

Chairman NEPRA

From: zahid jamil <zahid_jamil@yahoo.com>
Sent: Thursday, January 8, 2026 8:56 PM
To: Chairman@nepra.org.pk
Subject: Net metering

Dear Respected Sir

It is with great concern that the Govt is initiating net billing in place of net metring. This will effect lot of Pakistanis across the country. Kindly come consider to stop this.

Regards
Zahid Jamil
Sent from my iPhone

Registrar

Forwarded please:

☒ For nec. action ☐ For information

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For kind information, please.

1 Chairman 2 M (Tech)
3 M (Law) 4 M (Dev)

REGISTRAR OFFICE
Diary No. 238
Date: 13.1.26

CHAIRMAN
255
DY No. 09-01-26
Date: 13.1.26

Chairman NEPRA

From: Babar ali Babar ali <babarali118866@gmail.com>
Sent: Thursday, January 8, 2026 8:11 PM
To: Chairman@nepra.org.pk

Net meeting kab tak open Hogi

[Handwritten signature]

2

Forwarded please:

☒ For ~~rec.~~ action ☐ For information

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
Diary No: 737
Date: 13.1.26

CHAIRMAN
DY No. 254
Date: 09-01-26

352
14-1-26

Chairman NEPRA

From: Waseel 782 <waseel782@gmail.com>
Sent: Thursday, January 8, 2026 9:12 PM
To: Chairman@nepra.org.pk
Subject: Respected Chairman / Registrar NEPRA, I am writing to formally register my strong objection to the proposed Net Billing Policy scheduled to take effect from 14 January 2026, as published on NEPRA's website. This policy effectively ends net metering and ap

Registrar

Forwarded please:

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For kind information, please.

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

REGISTRAR OFFICE
Diary No: 736
Date: 13-1-26

CHAIRMAN
Diary No: 253
Date: 09-01-26

353
14-1-26

Chairman NEPRA

From: Mahmood Sultan <mahmoodsultan535@gmail.com>
Sent: Thursday, January 8, 2026 10:16 PM
To: Chairman@nepra.org.pk
Subject: New proposal of change in Net Metering existing policies

Dear Wasim Mukhtyar Chairman NEPRRA
AtaTurk Ave G-5/1 Islamabad.

Dear Sir,

We are really disappointed to learn the proposal of change in existing Net Metering policy.

It is a fact that Net Metering is producing power by the public at their own cost which has removed the IPP's unfair load at Govt/ public.

The proposal is unfair as giving benefit to DESCOs whereas customer spent their own money for system installation, single to 3phase, purchasing green /digital Bidirection meter.

I would request to continue the existing policy .

Will be obliged and regards.

Mahmood

Registrar

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For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input type="checkbox"/> M (Tech)
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REGISTRAR OFFICE
Diary No: 232
Date: 13.1.26

CHAIRMAN
Diary No: 252
Date: 09-01-26

Chairman NEPA

From: Ali Forex <forexali94@gmail.com>
Sent: Friday, January 9, 2026 9:28 AM
To: Chairman@nepra.org.pk
Subject: New policey Objection

AoA Sir kasy hain , Sir ap log kab humy jeeny dayn gayn phly ap log billo main extra unit dalty thy ab net metering main issue bna rhy hain ap ka kam logo ka lia asanian paida krna hai hum es new policey ko nai manty kindly es par gor karyn

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

REGISTRAR OFFICE
Diary No: 734
Date: 13.1.26

CHAIRMAN
300
Diary No: 12-01-26
Date: 12-01-26

Chairman NEPRA

From: Umar Abbasi <umarabbasihuawei@gmail.com>
Sent: Friday, January 9, 2026 6:23 PM
To: Chairman@nepra.org.pk
Subject: New policy on Solar system

Dear Sir,

In the past, Pakistan faced a severe electricity crisis, and the government addressed this challenge by supporting power generation through water dams. Gradually, when the country was also facing economic difficulties, people started installing solar systems to support the government and reduce pressure on the national grid.

Now, Alhamdulillah, Pakistan is in a better position. However, instead of supporting citizens, the proposed decision to limit or close full solar unit adjustments (net metering) will discourage this positive initiative. This step is neither beneficial nor in favor of Pakistanis who invested in solar energy in good faith.

You have the authority to stop this decision or introduce a better policy that ensures a win-win situation for both the government and the public. We sincerely request you to reconsider this matter in the best interest of the country.

Regards,
UHA
Jazz SCM

Registrar

Forwarded please:

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For kind information, please.

☒ Chairman ☒ 2. M (Tech)
☒ 1. M (Law) ☒ 1. M (Dev)

REGISTRAR OFFICE
Diary No: 733
Date: 13.1.26

CHAIRMAN
DY No: 299
Date: 09-1-26

Chairman NEPRA

From: Muhammad Jamshaid <muhammad.jamshaid8679@gmail.com>
Sent: Sunday, January 11, 2026 9:43 AM
To: Chairman@nepra.org.pk

No to new policy

Forwarded please:

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For kind information, please.

1 Chairman 2 M (Tech)
3 M (Law) 4 M (Dev)

Registrar

REGISTRAR OFFICE
Diary No. 232
Date: 13.1.26

CHAIRMAN
Dy No. 307
Date: 19-1-26

RECEIVED
Diary No. 357
Date: 14-1-26

Chairman NEPRA

From: Junaid Khalid <junaidkhalid2995@gmail.com>
Sent: Friday, January 9, 2026 12:28 PM
To: registrar@nepra.org.pk; info@nepra.org.pk
Cc: chairman@nepra.org.pk
Subject: Concern Regarding Proposed Changes in Net Metering Policy

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad, Pakistan

Dear Sir/Madam,

I am writing to express my serious concern regarding the proposed changes in the net metering policy.

Over the past few years, electricity consumers across Pakistan have installed solar power systems by investing substantial amounts of their hard-earned savings. Many households made these investments after enduring years of high electricity bills, with the understanding that net metering would provide long-term financial relief and energy security. In several cases, people arranged funds by selling assets or utilizing lifetime savings to adopt solar energy, based on the existing policy framework approved by NEPRA.

A sudden change in the net metering policy at this stage will severely impact consumer confidence and impose an unfair financial burden on those who relied on the continuity of this policy while making their investment decisions. Such retrospective changes may discourage future investment in renewable energy and contradict the national objective of promoting clean and affordable power generation.

I respectfully request NEPRA to reconsider the proposed amendments, ensure protection for existing solar consumers, and engage stakeholders transparently before implementing any major policy shift.

Thank you for your time and consideration.

Yours sincerely,

Regards,

Muhammad Junaid Khalid
Contact #: +923006012995

Registrar

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For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

REGISTRAR OFFICE
CHAIRMAN
Diary No: 761
Date: 13.1.26 By No. 278
Date: 09-01-26

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Thursday, 15 January, 2026 10:11 AM
To: Shahid Farooque
Subject: Fwd: Protest Statement - Net Metering Applications Suspension

----- Original Message -----

Subject: Fwd: Protest Statement - Net Metering Applications Suspension
Date: 2026-01-15 10:05
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Protest Statement - Net Metering Applications Suspension
Date: 2026-01-14 12:37
From: <info@betaenergypk.com>
To: <cad@nepra.org.pk>
Copy: <usama@betaenergypk.com>

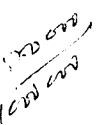
Dear Sir,

We strongly condemn the unlawful suspension of net metering application processing by Pakistan's distribution companies (DISCOs), including IESCO, LESCO, MEPCO, GEPCO and others. Despite NEPRA's clear warning and directives to ensure compliance with regulations, _the DISCOs continue to deny citizens their legal right to apply for net metering_.

For just three days, the application portals were temporarily opened, only to be abruptly shut down again without _explanation or justification_. This deliberate obstruction is not only a violation of NEPRA's rules, but also an open challenge to regulatory authority, consumer rights, and the national commitment to renewable energy.

This action harms thousands of households, businesses, and institutions ready to contribute clean energy to the national grid. It discourages investment in solar power, slows down Pakistan's transition to sustainable energy, and directly contradicts government policy encouraging distributed generation.

We demand:

- 
- * _Immediate restoration of the net metering application system across all DISCOs._
 - * _Transparent compliance with NEPRA's regulations without delay, manipulation, or discrimination._
 - * _Accountability and penalties for any DISCO deliberately obstructing public access to net metering._
 - * _A clear public timetable ensuring the process remains open, operational, and properly monitored._

Consumers are not begging for a favor--they are demanding a right granted by law, protected by NEPRA, and essential for Pakistan's Energy Future.

We stand united, informed, and determined.

Net metering Applications must be reinstated now!

Best Regard,

Engr. Asad Ullah Khan
Chief Executive Officer
Beta Energy Private Limited
03117562252
27, 2nd Floor, Zarpar Arcade,
D12 Markaz Islamabad

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Summary of Comments on Draft NEPRA (Prosumer) Regulations, 2025

The draft NEPRA (Prosumer) Regulations, 2025 propose to repeal and replace the 2015 net metering framework through substantive changes. While some amendments may be operationally justified, several provisions raise serious concerns regarding regulatory proportionality, investment certainty, and consistency with NEPRA's statutory mandate to promote efficiency, competition, and consumer protection.

Key concerns are as follows:

1. **Clause 3(2) – Capacity Limit**

Reducing the permissible distributed generation capacity from 150% to 100% of sanctioned load neither effectively curbs solar adoption nor provides a coherent policy signal. Instead, it discourages optimal system sizing without achieving meaningful grid reliance. If limiting solarization is the policy objective, a more rational approach would require a significantly lower threshold.

2. **Clause 7(1) – Term of Prosumer Agreement**

Shortening the agreement term from seven to five years, when read alongside the revised energy purchase pricing under Clause 14, materially worsens project economics. The combined effect extends payback periods, undermines revenue predictability, and erodes investor confidence, contrary to principles of regulatory certainty.

3. **Clause 9 – Protection Requirements**

The clause refers to a non-existent Schedule-VII, rendering it incomplete and unenforceable. Given the safety implications, protection requirements must be clearly specified and annexed before finalization.

4. **Clause 14 – Billing and Energy Purchase Price**

Replacing NAPPP with NAEPP for exported energy creates a significant tariff asymmetry between energy purchased from and sold to prosumers. This raises equity and proportionality concerns, especially as many prosumers remain net consumers. A more balanced approach would be unit-based netting of imports and exports, with tariffs applied only to the residual net position—reducing DISCO exposure, encouraging self-consumption, and limiting cross-subsidization.

5. **Schedule-I, Clause 5 – Mandatory Insurance**

Mandatory third-party and commercial liability insurance for prosumers is disproportionate and impracticable. Most prosumer installations are small-scale (5–10 kW), with minimal risk profiles. There is no established insurance market for such products in Pakistan, making compliance difficult or impossible. Existing technical standards and interconnection approvals already address safety and liability risks, rendering the requirement redundant and burdensome. Deletion of this clause is therefore recommended.

Conclusion

The submission urges reconsideration of Clauses 3(2), 7(1), 9, 14, and Schedule-I Clause 5 to ensure the final regulations:

- Comply with Sections 7, 31, and 34 of the NEPRA Act,
- Are supported by reasoned justification.
- Maintain regulatory certainty and proportionality, and
- Remain aligned with NEPRA's mandate to protect consumers while promoting efficient and sustainable power sector development.

13.01.26

Forwarded please:	
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For kind information, please:
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Important Comment
REGISTRAR OFFICE
Duty No. 794
Date: 13.1.26

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
NEPRA Tower, Attaturk Avenue (East), G-5/1
Islamabad

Email: registrar@nepra.org.pk

Subject: Submission of Detailed Comments / Objections on Draft NEPRA (Prosumer) Regulations, 2025 – Pursuant to Public Notice and Section 47(3) of NEPRA Act, 1997

Respected Sir,

With reference to the **Public Notice issued by the National Electric Power Regulatory Authority regarding the publication of the Draft NEPRA (Prosumer) Regulations, 2025 for eliciting public opinion**, in exercise of powers under **Section 47(3) of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997**, I hereby submit my **detailed written comments, objections, and recommendations** within the stipulated period of thirty (30) days.

The enclosed submission contains a **comprehensive, regulation-wise analysis** of the Draft Regulations, including:

1. **Legal and constitutional objections**, based on settled principles of administrative law and binding judgments of the **Honourable Supreme Court of Pakistan and High Courts**;
2. **Technical objections**, particularly addressing the fundamental misconception between DC module ratings and actual AC power injected into the grid, and proposing the internationally accepted concept of **Approved Export Capacity (AEC)** at the Point of Common Coupling (PCC);
3. **Economic and contractual concerns**, especially the impairment of vested rights and executed agreements under the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015;
4. **Comparative regulatory analysis**, highlighting discriminatory treatment between prosumers and Independent Power Producers (IPPs), despite both being private investors supplying electricity to the national grid; and
5. **Proposed corrective drafting**, including precise amendments and alternative clauses to ensure legality, predictability, grid safety, and investor confidence.

It is respectfully emphasized that the Draft Regulations, in their present form, raise **serious issues of retrospective application, excessive administrative discretion, lack of due process, and constitutional infirmities**, which—if not addressed at this consultative stage—may lead to avoidable disputes and litigation, undermining regulatory certainty and public confidence.

This submission is made **strictly in response to the published draft**, without prejudice to any legal rights or remedies available under the Constitution and law.

1365-1-26

You are respectfully requested to place this submission on record, consider it during the consultative and deliberative process mandated by Section 47 of the NEPRA Act, and acknowledge its receipt.

I have also sent a soft copy via email of this letter along with Detailed Written Comments / Objections on Draft NEPRA (Prosumer) Regulations, 2025 to your email address.

Thanking you.

Yours faithfully,

Engr. Dr. Muhammad Ahsen Ali
(Ph. D. Electrical Engineering)

Professional Engineer (Pakistan Engineering Council)
(Elect/28241, Electrical (Power))

Ex- S.E, Chashma Nuclear Power Generating Station Unit-1
(Pakistan Atomic Energy Commission)

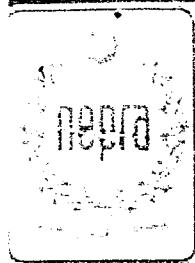
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Enclosure:

Detailed Written Comments / Objections on Draft NEPRA (Prosumer) Regulations, 2025

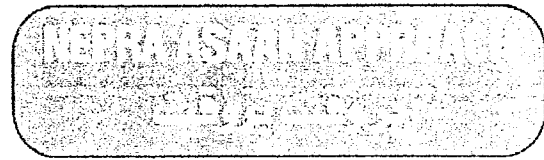
Contested
Chief Executive Officer
Shahzad Solar Pvt Ltd.



NATIONAL ELECTRIC POWER
REGULATORY AUTHORITY (NEPRA)



اب آپ "نپیر آسان پروج" موبائل ایپلیکیشن کے ذریعے
بجلی سے متعلق کوئی بھی شکایت فوری درج کروا سکتے ہیں



PUBLICATION OF DRAFT OF

THE NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (PROSUMER) REGULATIONS, 2025 FOR ELICITING PUBLIC OPINION

In exercise of the powers conferred by section 47 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (XL of 1997) ("NEPRA Act"), the Authority is pleased to publish draft of the National Electric Power Regulatory Authority (Prosumer) Regulations, 2025 for eliciting public opinion thereon as required under section 47(3) of the NEPRA Act. These Regulations can be accessed through the NEPRA's official website under the "News" section. Comments maybe sent to the Registrar (NEPRA) on the address given below within thirty(30) days of this publication.

Wasim Anwar Bhamla
Registrar NEPRA

NEPRA House, Atabulq Avenue (E-45), G-5/1, Islamabad
Phone: 051-20132001-5, 051-20301201-5

NEPRA House, Atabulq Avenue (E-45), G-5/1, Islamabad
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Point by point regulation clauses and proposed amendments with justifications


Chief Executive Officer
Shahzad Solar Pvt Ltd.

REGULATION 1

Short Title & Commencement

Regulation 1(1)

TEXT

“These Regulations may be called the National Electric Power Regulatory Authority (Prosumer) Regulations, 2025.”

OBJECTION

✓ No legal objection.

This is a standard short-title clause and is legally valid.

Regulation 1(2)

TEXT

“They shall come into force at once.”

OBJECTION — FUNDAMENTAL ILLEGALITY

(A) Violation of Section 47, NEPRA Act, 1997

Under **Section 47(3)** of the NEPRA Act:

- Regulations **do not acquire legal force** until:
 - finalized,
 - approved by the Authority, and
 - **notified in the Official Gazette.**

A regulation **cannot legally ‘come into force’** merely by being drafted or published for consultation.

(B) Contradiction with NEPRA's Own Public Notice

NEPRA has itself issued these as **draft regulations for eliciting public opinion**.

A legal instrument **cannot simultaneously be:**

- a **draft**, and
- **in force**.

This contradiction alone renders Regulation 1(2) **void ab initio**.

(C) Ultra Vires Administrative Enforcement

Because of this clause:

- DISCOs have:
 - refused applications.
 - delayed processing.
 - cited “new regulations” without Gazette notification.

This constitutes **administrative action without authority of law**, violating Article 4 of the Constitution.

CONSTITUTIONAL VIOLATIONS

Article 4 – Right to be Dealt with in Accordance with Law

Administrative action based on a **non-notified draft** is not “in accordance with law”.

Article 10A – Due Process

Rights cannot be curtailed without:

- lawful instrument,
- notice,
- enforceable commencement.

SUPREME COURT & HIGH COURT PRECEDENTS

Supreme Court

Mustafa Impex v. Government of Pakistan

📖 *PLD 2016 SC 808*

→ Executive authorities **cannot act on draft or unnotified instruments**; legal force arises **only** through lawful notification.

Durrani Ceramics v. Government of Pakistan

📖 *PLD 2014 SC 741*

→ Subordinate legislation **cannot affect rights until formally notified**.

Pakistan Tobacco Board v. Tahir Raza

📖 *PLD 2021 SC 970*

→ Anticipatory or implied enforcement of future law is unconstitutional.

High Courts

Lahore High Court – M/s Al-Samrez Enterprises v. Federation

📖 *PLD 2020 Lah 676*

→ Draft SROs **create no enforceable obligations**.

Sindh High Court – K-Electric Consumers Case

📖 *2022 CLC 1245*

→ Utility action without Gazette-notified authority is ultra vires.

ADMINISTRATIVE LAW PRINCIPLES VIOLATED

1. **Doctrine of Legality**
2. **Rule of Law**
3. **Certainty & Predictability**
4. **Non-Arbitrariness**
5. **Legitimate Expectation**

PRACTICAL CONSEQUENCES (ALREADY OCCURRING)

- DISCOs refusing net-metering applications
- Verbal instructions overriding law
- Regulatory chaos
- Litigation exposure for NEPRA
- Loss of investor confidence

PROPOSED CORRECTED CLAUSE (MANDATORY)

Replace Regulation 1(2) with:

“These Regulations shall come into force on such date as may be notified in the Official Gazette.”

FORMAL OBJECTION (VERBATIM – USE AS IS)

“Regulation 1(2) of the Draft NEPRA (Prosumer) Regulations, 2025 is ultra vires the NEPRA Act, 1997 and violative of Articles 4 and 10A of the Constitution, as draft subordinate legislation cannot legally ‘come into force’ prior to Gazette notification. The clause enables unlawful administrative enforcement and must be amended to provide commencement only upon lawful notification.”

CONCLUSION — REGULATION 1

⚠️ Until Regulation 1(2) is corrected, the entire draft is legally unenforceable.
No other provision can be validly implemented.

REGULATION 2

Definitions

Regulation 2(1) – Introductory Phrase

TEXT

“In these regulations unless there is anything repugnant in the subject or context,—”

OBJECTION — STRUCTURAL DEFECT

This standard phrase **cannot be used to override explicit definitions** or to justify administrative reinterpretation.

However, throughout these Regulations, DISCOs and the Authority can misuse the phrase “*subject or context*” to **import meanings that contradict engineering reality or accrued rights**.

CASE LAW

Supreme Court of Pakistan

• **Messrs Elahi Cotton Mills v. Federation**
PLD 1997 SC 582

→ Definitions cannot be overridden by administrative “contextual interpretation”.

REQUIRED CLARIFICATION

“Unless there is anything repugnant in the subject or context **and consistent with engineering standards, accrued rights, and constitutional guarantees.**”

Regulation 2(1)(a) — “Act”

TEXT

“ ‘Act’ means the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (XL of 1997).”

OBJECTION

✓ No objection. This is legally correct.

Regulation 2(1)(b) — “agreement”

TEXT

“ ‘agreement’ means the agreement between the licensee and the prosumer on the Authority’s approved format as per Schedule-I.”

OBJECTION — RETROSPECTIVITY RISK

This definition **fails to distinguish** between:

- agreements executed under **2015 Regulations**, and
- agreements to be executed under **2025 Regulations**.

This allows administrative authorities to:

- reinterpret **existing agreements** using **new definitions**, which is impermissible.

CONSTITUTIONAL VIOLATION

- **Article 4** – action not in accordance with law
- **Article 24** – deprivation of economic value of contracts

CASE LAW

Supreme Court

• **Durrani Ceramics v. Government of Pakistan**

PLD 2014 SC 741

→ Executed agreements cannot be impaired by subordinate legislation.

PROPOSED CORRECTED CLAUSE

“ ‘agreement’ means an agreement executed between the licensee and the prosumer **under the regulations in force at the time of execution**, and includes agreements executed under the 2015 Regulations, which shall continue to be governed by their original terms.”

Regulation 2(1)(c) — “applicable documents”

TEXT

includes “rules, regulations, terms, codes, manuals, directions, guidelines, orders...”

OBJECTION — UNCONTROLLED INCORPORATION

This definition allows **non-gazetted instruments** (manuals, guidelines, directions) to acquire **binding legal force**.

This violates:

- Section 47 NEPRA Act,
- Doctrine of legality.

CASE LAW

Supreme Court

• **Mustafa Impex v. Government of Pakistan**

PLD 2016 SC 808

→ Binding obligations must arise **only through lawfully notified instruments**.

PROPOSED CORRECTED CLAUSE

“ ‘applicable documents’ means **gazette-notified** rules, regulations, determinations, or codes issued under the Act, and shall not include internal manuals, guidelines, or directions that alter rights or obligations.”

Regulation 2(1)(d) — “applicable tariff”

TEXT

“tariff determined by the Authority and duly notified in the official Gazette”

OBJECTION — PARTIAL DEFECT

While Gazette notification is mentioned, this definition is later **nullified** by Regulation 14(3), which allows tariff revision during subsistence of agreement.

Definitions **cannot be contradicted later**.

CASE LAW

• **Pakistan State Oil v. Pakistan**

PLD 2018 SC 355

→ Tariff certainty is a vested commercial expectation.

REQUIRED LINKAGE

Tariff must be **locked for the agreement term**, especially for existing agreements.

Regulation 2(1)(e) — “applicant”

TEXT

“means a 3-phase 400V or 11kV consumer...”

OBJECTION — UNLAWFUL EXCLUSION

This **arbitrarily excludes**:

- single-phase domestic consumers.
- small residential users.

There is **no statutory basis** in the NEPRA Act for excluding single-phase consumers.

CONSTITUTIONAL VIOLATION

- **Article 25** – unreasonable classification
- **Article 18** – restriction on lawful business

CASE LAW

Supreme Court

- **Iqbal Hussain v. Province of Punjab**

PLD 2016 SC 680

→ Classification must have rational nexus with the object.

PROPOSED CORRECTED CLAUSE

“ ‘applicant’ means any consumer of a licensee, irrespective of phase configuration, subject to compliance with approved technical standards.”

Regulation 2(1)(f) — “application”

TEXT

includes application to licensee **and** concurrence to Authority

OBJECTION — ADMINISTRATIVE OVERREACH

This merges **two distinct processes**:

- interconnection (DISCO),
- regulatory oversight (NEPRA).

NEPRA is converted into a **transaction-level approval body**, which is not its statutory role.

CASE LAW

• **Habibullah Energy Ltd v. WAPDA**

PLD 2014 SC 87

→ Regulator is not an executing authority.

PROPOSED CORRECTION

Separate:

- “interconnection application”
- “regulatory concurrence (where applicable)”

Regulation 2(1)(h) — “billing cycle”

TEXT

“period of thirty days”

OBJECTION — INDIRECT RETROSPECTIVITY

This definition **forces monthly settlement**, conflicting with:

- annual reconciliation under 2015 agreements.

Definitions **cannot override executed contracts**.

CASE LAW

• **Pakistan Tobacco Board v. Tahir Raza**
PLD 2021 SC 970

PROPOSED ADDITION

“For existing agreements, billing cycle shall be as per the executed agreement.”

Regulation 2(1)(i) — “distributed generation facility”

TEXT

“facility ... up to 1 MW”

OBJECTION — MISSING TECHNICAL DISTINCTION

This definition:

- does **not distinguish DC capacity vs AC export**,
- enables misuse of **panel STC ratings** as capacity.

TECHNICAL ERROR (CORE)

Solar panel wattage:

- is rated at **STC**,
- **never achieved** in Pakistan climate.

Actual grid impact is **AC power injected at PCC**.

CASE LAW (ADMINISTRATIVE PRINCIPLE)

• **WAPDA v. Tariq Transport**
PLD 2015 SC 173

→ Technical standards must be **rational and evidence-based**.

PROPOSED INSERTION — AEC (MANDATORY)

“**Approved Export Capacity (AEC)**” means the maximum **AC electric power (kW)** approved to be injected into the distribution system **at the Point of Common Coupling (PCC)**, irrespective of DC module rating or STC nameplate capacity.

See Annexure-A for details.

Regulation 2(1)(j) — “distributed generation”

OBJECTION

Same defect as above: **generation** ≠ **export**.

Grid impact is determined by **export**, not generation.

Regulation 2(1)(s) — “prosumer”

TEXT

“means an applicant who has entered into an agreement...”

OBJECTION — RETROACTIVE RECLASSIFICATION

This definition allows:

- existing net-metered consumers to be **re-labelled as prosumers**,
- then subjected to **new billing and tariff rules**.

CASE LAW

Supreme Court

- **Durrani Ceramics** (PLD 2014 SC 741)

PROPOSED CORRECTED DEFINITIONS (MANDATORY)

“Existing Net Metering Consumer”

means a consumer having a valid agreement executed under the 2015 Regulations.

“Prosumer (New)”

means a consumer entering into an agreement under these Regulations after their lawful commencement.

Regulation 2(2) — Undefined Terms

TEXT

“Words not defined shall have same meaning as in the Act.”

OBJECTION

The Act **does not define technical concepts** like:

- export capacity,
- PCC,
- inverter limiting,
- hosting capacity.

This vacuum enables **administrative abuse**.

CONSOLIDATED OBJECTION

“Regulation 2 of the Draft NEPRA (Prosumer) Regulations, 2025 is legally defective as it enables retrospective application, uncontrolled administrative discretion, exclusionary classification, and technical mischaracterization of generation capacity by failing to define Approved Export Capacity (AEC), distinguish existing agreements, and restrict binding effect to gazette-notified instruments, in violation of Articles 4, 10A, 18, 24 and 25 of the Constitution and settled Supreme Court jurisprudence.”

Definitions can be re-organized as:

“2. Definitions

In these Regulations, unless there is anything repugnant in the subject or context:

(a) “Act” means the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (XL of 1997);

(b) “Authority” means the National Electric Power Regulatory Authority established under the Act;

*(c) “Approved Export Capacity (AEC)” means the **maximum injected active alternating current (AC) power, expressed in kilowatts (kW), at the Point of Common Coupling (PCC)** approved by the Distribution Company, representing the upper limit of electric power that a Prosumer is permitted to export to the Distribution System, determined on the basis of inverter AC rating and/or enforceable export-limiting controls, and verified at commissioning;*

*(d) “**Bidirectional Meter**” means a meter capable of recording import and export of electricity separately;*

*(e) “**Distribution Company**” or “**DISCO**” means a distribution licensee licensed by the Authority under the Act;*

*(f) “**Injected Capacity (AC) at PCC**” means the maximum active alternating current (AC) power actually injected by a Prosumer into the Distribution System at the Point of Common Coupling (PCC), as measured or verifiable at the bidirectional meter or through commissioning or compliance tests;*

*(g) “**Point of Common Coupling (PCC)**” means the point at which the Prosumer’s electrical system is connected to the Distribution System;*

*(h) “**Prosumer**” means a consumer who generates electricity primarily for self-consumption and exports surplus electricity to the Distribution System under these Regulations;*

*(i) “**Prosumer Agreement**” means the agreement executed between a Prosumer and the relevant Distribution Company under these Regulations;*

*(j) “**Settlement Period**” means the billing period determined by the Distribution Company;*

*(k) “**Tariff**” means the tariff determined by the Authority for electricity exported by the Prosumer;*

*(l) “**Year**” means a financial year.”*

REGULATION 3

Application Process for Interconnecting Distributed Generation Facility

Regulation 3(1)

TEXT

“Subject to sub-regulation (2), any applicant who meets the requirements of these regulations shall be eligible for submitting an application to a licensee as specified in Schedule-II...”

OBJECTION — APPARENTLY NEUTRAL, ACTUALLY CONDITIONAL

Although this clause appears enabling, eligibility is later **restricted through arbitrary technical and administrative filters**, especially sub-regulations (2) and (5).

This violates the principle that **eligibility clauses must not be rendered illusory by subsequent discretion**.

CASE LAW

Supreme Court

• **Iqbal Hussain v. Province of Punjab**

PLD 2016 SC 680

→ Eligibility criteria must be **real, effective, and non-illusory**.

REQUIRED CLARIFICATION

Eligibility must be **presumptive**, not discretionary, subject only to **objective AEC-based limits**.

Regulation 3(1) – Proviso (Information within two days)

TEXT

“the licensee shall be bound to provide information and Authority’s approved documents ... within two working days.”

OBJECTION — NO ENFORCEMENT MECHANISM

There is:

- no penalty for non-compliance,
- no deemed approval,
- no consequence if DISCO ignores this duty.

This turns a mandatory obligation into a **directory suggestion**.

CASE LAW

• Al-Jehad Trust v. Federation of Pakistan

PLD 1996 SC 324

→ Statutory duties without enforcement mechanisms invite abuse.

PROPOSED CORRECTION

“Failure of the licensee to comply within two working days shall result in **deemed completeness of application** for purposes of further processing.”

Regulation 3(2)

TEXT

“The capacity of a proposed distributed generation facility shall not exceed the sanctioned load of the applicant’s premises:

Provided that the Authority may revise the capacity ... at any time.”

✗ CORE LEGAL & TECHNICAL DEFECT (MOST SERIOUS)

(A) TECHNICAL ERROR — CAPACITY MISCHARACTERIZATION

This clause **wrongly equates**:

- *installed generation capacity*
with
- *grid impact*.

In solar PV systems:

- **DC module capacity (STC wattage) \neq**
- **actual AC export to grid.**

Grid safety depends **only on AC power injected at PCC**, not panel size.

(B) ABSENCE OF AEC (APPROVED EXPORT CAPACITY)

There is **no definition or recognition** of:

- export-limited inverters,
- PCC-based injection limits,
- commissioning tests.

This allows DISCOs to:

- reject applications based on **panel nameplate wattage**,
- ignore inverter export caps.

(C) UNCONTROLLED REVISION POWER — “AT ANY TIME”

The proviso grants the Authority **absolute power** to revise capacity:

- without notice,
- without hearing,
- without criteria,
- during subsistence of agreement.

This is **classic arbitrary discretion**.

CONSTITUTIONAL VIOLATIONS

- **Article 4** — action not in accordance with law
- **Article 10A** — no hearing / due process
- **Article 18** — destruction of lawful business
- **Article 24** — economic deprivation of installed assets

SUPREME COURT PRECEDENTS

Supreme Court of Pakistan

- **Mustafa Impex v. Government of Pakistan**
PLD 2016 SC 808
→ Unfettered executive discretion is unconstitutional.
- **Durrani Ceramics v. Government of Pakistan**
PLD 2014 SC 741
→ Vested rights cannot be altered mid-stream.
- **Pakistan Tobacco Board v. Tahir Raza**
PLD 2021 SC 970
→ Retrospective economic impairment is unlawful.

HIGH COURT

- **Lahore High Court**
M/s Nishat Power v. NEPRA
2020 CLD 425
→ Capacity and tariff must be **certain and predictable**.

PROPOSED CORRECTED CLAUSE (MANDATORY)

“The capacity of a proposed distributed generation facility shall be determined **solely on the basis of Approved Export Capacity (AEC)**, being the maximum AC electric power (kW)

approved to be injected at the Point of Common Coupling (PCC), irrespective of DC module rating or STC nameplate capacity.

The Approved Export Capacity shall not exceed the sanctioned load **unless otherwise justified by a feeder study**, and once approved, shall not be revised except prospectively after notice and hearing.”

Regulation 3(3)

TEXT

“An applicant proposing ... 250 kW or above shall be obligated to conduct and submit a load flow study...”

OBJECTION — DISPROPORTIONATE & UNDEFINED

1. No **technical justification** why 250 kW is chosen.
2. No defined **study scope, standards, or acceptance criteria**.
3. No clarity on **who bears cost** in case of DISCO rejection.

ADMINISTRATIVE LAW DEFECT

Violates **proportionality** and **reasoned decision-making**.

CASE LAW

• **WAPDA v. Tariq Transport Company**

PLD 2015 SC 173

→ Technical requirements must be **rational, evidence-based, and proportionate**.

AEC-BASED CORRECTION

Load flow studies should be required **only where cumulative AEC on feeder exceeds hosting thresholds**, not on arbitrary installed capacity.

PROPOSED CLAUSE

“Load flow studies shall be required only where the cumulative **Approved Export Capacity (AEC)** on a feeder exceeds the hosting capacity determined through standardized criteria notified by the Authority.”

Regulation 3(5) — Second Proviso (80% Transformer Cap)

TEXT

“the licensee shall not entertain any application if the distributed generation capacity connected to a particular distribution transformer has reached 80% of its rated capacity.”

✗ ARBITRARY & TECHNICALLY UNSOUND

(A) NO ENGINEERING BASIS

There is **no universal 80% rule** in:

- IEC standards,
- IEEE 1547,
- utility planning practice.

Transformer rating alone **does not determine reverse-power capability**.

(B) AGAIN — DC CAPACITY CONFUSION

The clause does not clarify whether 80% refers to:

- DC panel rating,
- inverter AC rating,
- or actual export at PCC.

This ambiguity invites abuse.

CONSTITUTIONAL VIOLATIONS

- **Article 25** — unequal treatment
- **Article 18** — arbitrary market restriction

CASE LAW

- **Sindh High Court**

K-Electric Consumers Case

2022 CLC 1245

→ Utilities cannot impose arbitrary technical caps without studies.

PROPOSED CORRECTED CLAUSE

“No application shall be rejected solely on the basis of transformer nameplate capacity. Any limitation shall be based on **feeder-specific hosting capacity studies** and shall apply only to **Approved Export Capacity (AEC)**.”

Regulation 3(6) & 3(7)

TEXT

Initial review / rejection on technical infeasibility.

OBJECTION — UNGUIDED DISCRETION

“Technically feasible” is **undefined**, allowing subjective rejection.

There is:

- no right to representation,
- no appeal,
- no disclosure of study.

CASE LAW

• Province of Punjab v. Salman Iqbal

PLD 2011 SC 673

→ Administrative decisions must be **reasoned and reviewable**.

PROPOSED ADDITION

“Any rejection shall be accompanied by a **written technical report**, with reasons, and shall be appealable before the Authority.”

CONSOLIDATED OBJECTION (REGULATION 3)

“Regulation 3 of the Draft NEPRA (Prosumer) Regulations, 2025 is ultra vires and technically flawed as it mischaracterizes generation capacity, ignores Approved Export Capacity (AEC), grants unfettered power to revise capacity at any time, imposes arbitrary transformer caps without studies, and enables subjective rejection without due process, in violation of Articles 4, 10A, 18, 24 and 25 of the Constitution and settled Supreme Court jurisprudence.”

There should be details of “Approved Export Capacity (AEC) in section 3. It is a universal worldwide practice .See annexure-A for details. The modified section 3 can be:

“3. Eligibility and Capacity

3.1 A consumer shall be eligible to become a Prosumer subject to fulfillment of the criteria prescribed under these Regulations.

*3.2 The capacity of a Prosumer installation for the purposes of interconnection approval, grid impact assessment, transformer and feeder loading, billing, settlement, and regulatory compliance shall be determined **solely on the basis of its Approved Export Capacity (AEC)***

*3.3 The Approved Export Capacity shall represent the maximum injected **active AC power at the Point of Common Coupling (PCC)** and shall be approved by the Distribution Company in accordance with these Regulations.*

*3.4 The direct current (DC) nameplate rating of photovoltaic modules, including ratings specified under Standard Test Conditions (STC) or NMOT/NOCT-related conditions, shall **not** be used to determine eligibility, sanctioned capacity, or compliance under these Regulations.*

3.5 The Approved Export Capacity shall be based on:

- *(a) the inverter's AC nameplate rating; or*
- *(b) an enforceable export-limiting control configured in the inverter or associated equipment;*
whichever results in the lower exportable AC power at the Point of Common Coupling.

3.6 Installation of photovoltaic modules or inverters in excess of the Approved Export Capacity shall be permitted, provided that the injected AC power at the Point of Common Coupling does not exceed the approved AEC.

3.7 Compliance with the Approved Export Capacity shall be verified at commissioning and may be verified thereafter through measurement of injected AC power at the Point of Common Coupling."

REGULATION 4

Concurrence

Regulation 4(1)

TEXT

“Notwithstanding anything contained in the applicable documents, a prosumer shall seek concurrence of the Authority...”

✗ OBJECTION — STATUTORY OVERREACH & NON-OBSTANTE MISUSE

(A) Improper Use of ‘Notwithstanding’ Clause

The opening non-obstante phrase overrides **all applicable documents**, including:

- existing regulations,
- determinations,
- executed agreements,
- procedural frameworks.

A non-obstante clause **cannot be used to nullify vested rights or statutory schemes unless expressly authorized by the parent Act**, which Section 47 of the NEPRA Act does **not** do.

(B) NEPRA Transformed into Transaction-Level Approver

This clause converts NEPRA from a **regulator** into a **case-by-case project approval authority**, even for small rooftop systems.

Nothing in:

- Section 7, or
 - Section 47
- authorizes NEPRA to micro-approve individual distributed generation projects.

CONSTITUTIONAL VIOLATIONS

- **Article 4** – action not in accordance with law
- **Article 18** – unreasonable restriction on lawful business
- **Article 25** – unequal treatment compared to other generators (e.g., captive power)

SUPREME COURT PRECEDENTS

Mustafa Impex v. Government of Pakistan

☐ *PLD 2016 SC 808*

→ Regulatory bodies **cannot assume powers not expressly granted by statute**, especially through subordinate legislation.

Habibullah Energy Ltd v. WAPDA

☐ *PLD 2014 SC 87*

→ Regulator's role is **policy and oversight**, not execution or transaction-level control.

PROPOSED CORRECTED CLAUSE

“Subject to these Regulations, a prosumer shall comply with such regulatory requirements as may be notified by the Authority; provided that **no case-by-case concurrence shall be required for distributed generation facilities operating within the Approved Export Capacity (AEC)** and meeting notified technical standards.”

Regulation 4(1) – Proviso (Fresh concurrence for modification)

TEXT

“Provided that the prosumer shall be required to obtain afresh concurrence... prior to any modification in the technical parameters...”

✗ OBJECTION — OVERBROAD & TECHNICALLY IRRATIONAL

(A) No Distinction Between Material and Non-Material Modifications

This clause:

- treats inverter replacement.
- protection upgrade.
- DC module rearrangement
the same as a capacity increase.

This is **technically indefensible**.

(B) AEC Completely Ignored

A prosumer may:

- increase DC modules.
- upgrade inverter efficiency,
without increasing export to grid, yet still be forced into fresh concurrence.

This penalizes **efficient design** without grid impact.

CASE LAW

Province of Punjab v. Salman Iqbal

☐ *PLD 2011 SC 673*

→ Administrative conditions must be **reasonable, proportionate, and rationally connected to the objective**.

PROPOSED AEC-BASED CORRECTION

“Fresh concurrence shall be required **only where a modification results in an increase in the Approved Export Capacity (AEC)** at the Point of Common Coupling.

Modifications limited to DC modules, inverter replacement, or protection upgrades that do not alter AEC shall not require fresh concurrence.”

Regulation 4(2)

TEXT

“Licensee shall forward the application for accord of concurrence to the Authority...”

✗ OBJECTION — DUAL APPROVAL & ADMINISTRATIVE BOTTLENECK

This creates:

- **two-tier approval** (DISCO + NEPRA),
- with no statutory necessity.

This violates the principle of **administrative efficiency** and introduces:

- delay,
- uncertainty,
- rent-seeking risk.

CONSTITUTIONAL VIOLATION

- **Article 18** – unreasonable regulatory barrier to business
- **Article 4** – arbitrary administrative layering

HIGH COURT PRECEDENT

Lahore High Court – Nishat Power Ltd v. NEPRA

☐ 2020 CLD 425

→ Regulatory processes must be **predictable and streamlined**, not duplicative.

PROPOSED CORRECTION

“The licensee shall process interconnection applications independently.
Concurrence of the Authority, where required, shall be **automatic upon certification of compliance with Approved Export Capacity (AEC)** and notified standards.”

Regulation 4(3)

TEXT

“The Authority may... accord a concurrence... within seven working days...”

✗ OBJECTION — “MAY” + NO DEEMED APPROVAL

(A) Discretionary Language

The use of “*may*” instead of “*shall*”:

- allows arbitrary refusal,
- provides no enforceable right.

(B) No Deemed Approval

If NEPRA:

- delays,
- remains silent,
the application **dies without remedy**.

CASE LAW

Al-Jehad Trust v. Federation of Pakistan

☐ *PLD 1996 SC 324*

→ Where statutory power affects rights, timelines must be **mandatory and enforceable**.

PROPOSED CORRECTED CLAUSE

“The Authority **shall** accord concurrence within seven working days.
In case of failure to respond within the prescribed period, concurrence shall be **deemed to have been granted**, subject to compliance with Approved Export Capacity (AEC).”

Regulation 4(4)

TEXT

“In case the prosumer fails to commence distributed generation within six months... it shall be required to obtain fresh concurrence.”

✗ OBJECTION — UNREASONABLE & UNCONNECTED TO GRID IMPACT

Delays may arise due to:

- DISCO meter availability,
- grid readiness,
- force majeure,
- financing.

Forcing fresh concurrence:

- adds cost,
- resets rights,
- serves **no technical purpose**.

CONSTITUTIONAL VIOLATIONS

- **Article 18** – unreasonable restriction
- **Article 10A** – absence of hearing before adverse consequence

SUPREME COURT

Pakistan Defence Officers Housing Authority v. Lt Col Retd Syed Jawaid Ahmed

☐ *PLD 2013 SC 170*

→ Administrative consequences must allow **representation and justification**.

PROPOSED CORRECTION

“Fresh concurrence shall not be required where delay in commissioning does not result in an increase in Approved Export Capacity (AEC), and where reasons for delay are duly recorded.”

CONSOLIDATED OBJECTION (REGULATION 4)

“Regulation 4 of the Draft NEPRA (Prosumer) Regulations, 2025 is ultra vires the NEPRA Act, constitutionally infirm, and administratively inefficient, as it imposes case-by-case concurrence without statutory basis, ignores Approved Export Capacity (AEC), creates duplicative approvals, allows unguided discretion, and introduces delay without grid-related justification, in violation of Articles 4, 10A, 18, and 25 of the Constitution and settled Supreme Court jurisprudence.”

REGULATION 5

General Powers, Rights and Obligations of the Licensee

Regulation 5(1)(a)

TEXT

“allow any of its consumers to establish distributed generation facilities... using either (i) a standard meter capable of registering the flow of electricity in two directions, or (ii) two separate meters...”

OBJECTION — APPARENT ENABLEMENT, HIDDEN CONTROL

Although phrased as permissive, this clause:

- leaves **meter choice entirely to the licensee**,
- allows DISCOs to **force two-meter architecture**, which structurally defeats netting and facilitates net-billing economics.

This converts a **technical option** into a **policy weapon**.

ADMINISTRATIVE LAW DEFECT

- Discretion is **unguided**
- No criteria when one meter vs two meters may be imposed
- Enables indirect alteration of billing outcomes through metering design

CONSTITUTIONAL VIOLATIONS

- **Article 4** – arbitrary administrative action
- **Article 18** – indirect restriction on business viability
- **Article 25** – unequal treatment through discretionary meter selection

CASE LAW

Supreme Court

• **Mustafa Impex v. Federation of Pakistan**

PLD 2016 SC 808

→ Policy outcomes cannot be achieved through **administrative discretion disguised as technical choice**.

Lahore High Court

• **Attock Gen Ltd v. NEPRA**

2019 CLD 1121

→ Metering and billing architecture must follow **regulatory certainty**, not ad-hoc utility preference.

AEC-BASED CORRECTION

Metering must measure **actual AC export at PCC**, not be used to alter settlement logic.

PROPOSED CORRECTED CLAUSE

“Metering architecture shall be selected solely for accurate measurement of import and export at the Point of Common Coupling (PCC) and shall not be used to alter billing or settlement rights. Meter choice shall not affect the Approved Export Capacity (AEC) or applicable billing mechanism ”

Regulation 5(1)(b)

TEXT

“enter into an agreement with the applicant...”

Provided that the approval of interconnection facility shall not be unreasonably withheld;”

OBJECTION — EMPTY SAFEGUARD

The phrase “*shall not be unreasonably withheld*” is:

- undefined,
- unenforceable,
- unsupported by timelines or remedies.

This allows **cosmetic compliance** while approvals are effectively blocked.

ADMINISTRATIVE LAW DEFECT

A discretionary power without:

- criteria,
 - reasons,
 - appeal
- is **arbitrary by design**.

CASE LAW

Supreme Court

• **Province of Punjab v. Salman Iqbal**

PLD 2011 SC 673

→ “Reasonableness” must be **objectively reviewable**, not left to subjective satisfaction.

PROPOSED CORRECTION

“Interconnection approval shall be granted as a matter of right upon compliance with these regulations and Approved Export Capacity (AEC), and any refusal shall be supported by a written, reasoned order subject to appeal.”

Regulation 5(1)(c)

TEXT

“have the right to review the design... inspect... and may require the prosumer to make modifications...”

✗ SERIOUS DUE-PROCESS & PROPORTIONALITY VIOLATION

(A) Unlimited Power to Demand Modifications

No limits on:

- scope,
- cost,
- necessity,
- grid relevance.

A DISCO can force:

- redesign,
- inverter replacement,
- re-engineering without proving grid risk.

(B) AEC IGNORED

Modifications may be demanded even where:

- **Approved Export Capacity (AEC)** is unchanged,
- no increase in grid injection occurs.

CONSTITUTIONAL VIOLATIONS

- **Article 10A** – no hearing before adverse requirement
- **Article 18** – unreasonable business interference
- **Article 24** – economic deprivation without compensation

CASE LAW

Supreme Court

• WAPDA v. Tariq Transport Company

PLD 2015 SC 173

→ Technical conditions must be **rational, necessary, and proportionate**.

PROPOSED AEC-BASED CORRECTION

“The licensee may require modifications **only where necessary to ensure compliance with the Approved Export Capacity (AEC)** or to address demonstrable grid safety risks, supported by a written technical report and subject to representation by the prosumer.”

Regulation 5(1)(d)

TEXT

“introduce necessary validation checks to monitor the unlawful extension of the distribution generation facility.”

OBJECTION — VAGUE & OVERBROAD

The term “**unlawful extension**” is:

- undefined,
- technically ambiguous,
- prone to misuse.

This allows DISCOs to treat **DC module additions** (which may not affect export) as violations.

ADMINISTRATIVE LAW DEFECT

Vagueness violates:

- certainty,
- predictability,
- rule of law.

CASE LAW

Supreme Court

• **Messrs Elahi Cotton Mills v. Federation**

PLD 1997 SC 582

→ Vague regulatory language enabling arbitrary enforcement is unconstitutional.

AEC-BASED CORRECTION

Only export beyond AEC can be unlawful — not internal system configuration.

PROPOSED CLAUSE

“Validation checks shall be limited to verifying that the prosumer does not export power in excess of the Approved Export Capacity (AEC) at PCC.

Internal system configuration, DC module capacity, or inverter oversizing shall not constitute unlawful extension.”

Regulation 5(2)

TEXT

“A licensee may limit the operation and/or disconnect... with or without notice, in the event of fault.”

✗ EXTREMELY DANGEROUS CLAUSE

(A) ‘With or Without Notice’ — Blanket Disconnection Power

This allows:

- instant economic shutdown.
- no hearing.
- no verification.
- no post-action remedy.

(B) ‘Fault’ is Broadly Defined

Minor inverter trips or grid disturbances may be labeled “faults”.

CONSTITUTIONAL VIOLATIONS

- **Article 10A** – denial of due process
- **Article 18** – business disruption
- **Article 24** – deprivation of economic use of property

SUPREME COURT

• **Government of Punjab v. Ahmad Hassan Shah**

PLD 2016 SC 104

→ Even emergency powers must be **proportionate and reviewable**.

PROPOSED CORRECTED CLAUSE

“Immediate disconnection without notice shall be permitted only where there is an imminent threat to grid safety.

In all other cases, prior notice, reasons, and opportunity of representation shall be mandatory, and export shall not be curtailed below the Approved Export Capacity (AEC) without technical justification.”

Regulation 5(3)

TEXT

“licensee may also limit the operation and/or disconnect... upon thirty days written notice...”

OBJECTION — UNCHECKED TERMINATION POWER

Grounds include:

- “licensee’s determination” of non-compliance

- expiry or termination of agreement

There is:

- no neutral adjudication.
- no appeal before action.
- no requirement of proof.

CASE LAW

Supreme Court

• Durrani Ceramics v. Government of Pakistan

PLD 2014 SC 741

→ Contractual and economic rights cannot be extinguished by unilateral administrative determination.

AEC ISSUE

Export may be cut **even where AEC compliance exists**, solely on procedural allegations.

PROPOSED CORRECTION

“Disconnection or limitation under this sub-regulation shall be subject to:

- (a) a reasoned written order;
- (b) opportunity of hearing; and
- (c) confirmation that the prosumer has exceeded the Approved Export Capacity (AEC) or poses a demonstrable grid risk.”

CONSOLIDATED OBJECTION (REGULATION 5)

“Regulation 5 of the Draft NEPRA (Prosumer) Regulations, 2025 is constitutionally infirm and administratively arbitrary, as it vests excessive, unguided powers in licensees to control metering architecture, demand modifications, curtail export, and disconnect facilities without due process or AEC-based technical justification, in violation of Articles 4, 10A, 18, 24 and 25 of the Constitution and settled Supreme Court jurisprudence.”

REGULATION 6

Rights and Obligations of the Prosumer

Regulation 6(1)

TEXT

“A prosumer shall operate and maintain its distributed generation facility and interconnection facilities in accordance with prudent electrical practices.”

✗ OBJECTION — VAGUENESS & UNGUIDED STANDARD

(A) Undefined Legal Standard

The phrase “**prudent electrical practices**” is:

- undefined,
- non-codified,
- open-ended.

This allows licensees to **substitute their own subjective standards** in inspections, compliance notices, and disconnection actions.

Administrative law requires that **obligations affecting civil and economic rights be precise and ascertainable**, not aspirational.

(B) No Reference to Notified Technical Standards

The clause does **not reference**:

- IEC / IEEE standards,
- Grid Code provisions,
- Authority-notified SOPs.

This creates a **moving compliance target**, violating legal certainty.

CONSTITUTIONAL VIOLATIONS

- **Article 4** — action not in accordance with law
- **Article 10A** — absence of clear standards before adverse action
- **Article 18** — unreasonable restriction on lawful business

CASE LAW

Supreme Court

• **Messrs Elahi Cotton Mills v. Federation**

PLD 1997 SC 582

→ Vague statutory language enabling arbitrary enforcement is unconstitutional.

• **Province of Punjab v. Salman Iqbal**

PLD 2011 SC 673

→ Discretion must be structured by **objective criteria**.

AEC-SPECIFIC DEFECT

Even where a prosumer **fully complies with Approved Export Capacity (AEC)** and inverter export limits, DISCOs may still allege “imprudence” based on:

- DC oversizing,
- inverter redundancy,
- design preferences.

This is technically incorrect and legally abusive.

PROPOSED CORRECTED CLAUSE

“A prosumer shall operate and maintain its distributed generation facility in compliance with **notified IEC/IEEE standards, the Grid Code, and Authority-approved SOPs**, and shall be deemed compliant where export does not exceed the **Approved Export Capacity (AEC)** at the Point of Common Coupling.”

Regulation 6(2)

TEXT

“The prosumer shall not have any right to utilize licensee’s interconnection facilities for the sale of electricity to any other person.”

✗ OBJECTION — OVERBROAD & UNNECESSARY PROHIBITION

(A) Absolute Restriction Without Context

This clause:

- prohibits **all third-party transactions**,
- without distinguishing between:
 - wheeling,
 - community solar,
 - virtual net metering,
 - future market structures.

The NEPRA Act **does not mandate such absolute prohibition** for small distributed generators.

(B) Pre-emptive Suppression of Lawful Business Models

The clause **freezes market evolution** through subordinate legislation, exceeding regulatory necessity.

CONSTITUTIONAL VIOLATIONS

- **Article 18** — freedom of trade and business
- **Article 25** — unequal treatment vis-à-vis captive generators and IPPs

CASE LAW

Supreme Court

• **Iqbal Zafar Jhagra v. Federation of Pakistan**

PLD 2013 SC 243

→ Subordinate legislation cannot pre-emptively stifle lawful economic activity without express statutory mandate.

High Court

• **Sindh High Court – K-Electric Consumers Case**

2022 CLC 1245

→ Utilities cannot impose market restrictions beyond statutory authority.

AEC CONTEXT

This restriction is **irrelevant to grid safety**, which depends only on:

- **export magnitude (AEC).**
- **not on identity of counter-party.**

Thus, the clause has **no technical nexus** to grid protection.

PROPOSED CORRECTED CLAUSE

“A prosumer shall utilize the interconnection facilities solely in accordance with the approved arrangement; provided that no restriction shall apply beyond ensuring that export does not exceed the **Approved Export Capacity (AEC)**, and subject to future market mechanisms notified by the Authority.”

STRUCTURAL DEFECT OF REGULATION 6

1. **All obligations, no rights**
2. **No safeguards against misuse**
3. **No reference to AEC or PCC-based export control**
4. **No procedural protection against arbitrary enforcement**

This violates the administrative-law principle of **reciprocity**: obligations must be matched by protections.

CONSOLIDATED OBJECTION (REGULATION 6)

“Regulation 6 of the Draft NEPRA (Prosumer) Regulations, 2025 is legally deficient and constitutionally infirm, as it imposes vague and unstructured obligations upon prosumers without reference to notified standards, ignores Approved Export Capacity (AEC) as the sole grid-relevant metric, and imposes absolute prohibitions unrelated to grid safety, in violation of Articles 4, 10A, 18 and 25 of the Constitution and settled Supreme Court jurisprudence.”

REGULATION 7 – Term of Agreement and Conditions

Regulation 7(1) – Term of Agreement

Original Text

“The term of the agreement between prosumer and licensee shall be five years with effect from date of commissioning of distributed generation facility.”

✗ OBJECTION — ECONOMIC, CONSTITUTIONAL & REGULATORY INVALIDITY

(A) Arbitrary Five-Year Term Is Unsustainable

A mandatory **five-year agreement term** is:

- wholly disconnected from the **20–25 year technical and economic life** of solar PV assets;
- inconsistent with recovery periods ;
- destructive of financing and bankability.

This converts a lawful infrastructure investment into a **non-recoverable sunk cost**, amounting to **regulatory expropriation**.

(B) Discriminatory Treatment Compared with IPPs

Independent Power Producers (IPPs) in Pakistan are granted:

- **20–25 year Power Purchase Agreements (PPAs)**;
- tariffs **denominated or indexed in USD**;
- guaranteed offtake and payment security;
- change-in-law and termination compensation protections.

Prosumers, by contrast:

- invest **entirely at their own risk**;
- receive **no capacity payments**;
- supply electricity locally, reducing losses and peak demand;
- yet are restricted to a **five-year agreement with uncertain renewal**.

Both IPPs and prosumers:

- invest private capital,
- generate electricity,
- inject power into the national grid.

There exists **no intelligible differentia** justifying why:

- large centralized generators receive **long-term, dollar-protected PPAs**, while
- small distributed generators are denied even **minimum tenure certainty**.

This constitutes **hostile discrimination**.

C) Constitutional Violations

- **Article 25** — unequal treatment of similarly placed electricity suppliers
- **Article 18** — unreasonable restriction on lawful business
- **Article 24** — deprivation of economic value of property
- **Article 4** — action not in accordance with law

(D) Supreme Court Authority

- **Durrani Ceramics v. Government of Pakistan** (*PLD 2014 SC 741*)
→ State action cannot destroy legitimate commercial expectations.
- **Pakistan State Oil v. Federation of Pakistan** (*PLD 2018 SC 355*)
→ Energy investments require certainty of tenure and tariff.
- **Iqbal Hussain v. Province of Punjab** (*PLD 2016 SC 680*)
→ Discriminatory regulatory treatment violates Article 25.

✓ PROPOSED CORRECTED CLAUSE (MANDATORY)

“The term of the agreement between the prosumer and the licensee shall be not less than fifteen (15) years and may extend up to twenty-five (25) years from the date of commissioning, consistent with the economic life of the distributed generation facility and the treatment accorded to other electricity suppliers under long-term power purchase arrangements, subject to continued compliance with the Approved Export Capacity (AEC) and grid safety standards.”

Regulation 7(2) – Renewal of Agreement

Original Text

“At the expiry of the initial term, the agreement may be renewed... with mutual consent of the licensee and prosumer.”

✗ OBJECTION — COERCIVE CONSENT & MONOPOLY ABUSE

“Mutual consent” in a monopoly grid environment is **illusory**:

- the prosumer has sunk capital;
- the licensee controls grid access;
- refusal to renew forces economic loss unrelated to grid safety.

This enables **coercive renegotiation**, contrary to administrative fairness.

Additional IPP Comparison

IPP PPAs:

- **do not depend on discretionary renewal;**
- provide continuity unless terminated for defined breach.

Prosumers, supplying the same grid, must receive **comparable continuity protection**.

✓ PROPOSED CORRECTED CLAUSE

“Upon expiry of the initial term, the agreement shall be renewed automatically on the same terms, unless the prosumer has materially breached the agreement or exceeded the Approved Export Capacity (AEC), as established through due process and a reasoned order.”

STRUCTURAL DEFECT CURED BY THIS REVISION

This revised Regulation 7:

- aligns prosumer treatment with IPPs;
- restores bankability;
- ties continuity strictly to **AEC compliance**, not discretion;
- removes discriminatory tenure disparity.

REGULATION 8 – Termination of Agreement

Regulation 8(1)

TEXT

“The prosumer may terminate the agreement upon thirty days written notice if it decides to discontinue the sale of electricity to the licensee.”

✓ NO LEGAL OBJECTION (WITH CLARIFICATION)

This clause is consistent with:

- freedom of contract,
- Article 18 (right to business),
- voluntary exit from commercial arrangements.

However, **clarification is required** to prevent downstream abuse.

△ □ CLARIFICATION REQUIRED

Termination by prosumer must **not trigger penalties, retrospective billing, or forfeiture of accrued credits**, especially where:

- the prosumer has complied with **Approved Export Capacity (AEC)**,
- no grid violation exists.

✓ PROPOSED CLARIFYING INSERTION

“Termination by the prosumer shall not result in forfeiture of accrued rights, credits, or economic benefits earned prior to termination, nor shall it attract any penalty where the prosumer has remained compliant with the Approved Export Capacity (AEC).”

Regulation 8(2)

TEXT

“The licensee may terminate the agreement upon thirty days written notice subject to prior approval of the Authority.”

✗ OBJECTION — UNILATERAL TERMINATION POWER & STRUCTURAL IMBALANCE

(A) Termination Without Defined Grounds

This clause:

- does **not specify grounds** for termination,
- allows termination **even in absence of breach**,
- converts a long-term infrastructure arrangement into a **revocable permission**.

Such open-ended termination power is **antithetical to bankability**.

(B) “Approval of the Authority” Is Not Due Process

Requiring NEPRA approval **does not cure illegality** because:

- no criteria are prescribed,
- no hearing is guaranteed,
- no requirement of reasoned order exists.

This is **rubber-stamp approval**, not adjudication.

(C) Discriminatory Treatment Compared with IPPs (CARRY-FORWARD POINT)

Independent Power Producers (IPPs):

- cannot have PPAs terminated at will,
- enjoy termination only for **defined events of default**.
- receive **termination compensation**.

Prosumers:

- face termination **without defined breach**,
- receive **no compensation**, despite sunk capital.

This disparity has **no rational nexus**.

CONSTITUTIONAL VIOLATIONS

- **Article 18** — destruction of ongoing lawful business
- **Article 24** — deprivation of property without compensation
- **Article 10A** — absence of hearing and due process
- **Article 25** — discriminatory treatment vis-à-vis IPPs

SUPREME COURT PRECEDENTS

Durrani Ceramics v. Government of Pakistan

PLD 2014 SC 741

→ The State cannot, through regulatory action, **destroy vested contractual rights** without compensation.

Pakistan State Oil v. Federation of Pakistan

PLD 2018 SC 355

→ Energy contracts require **certainty and protection against arbitrary termination**.

Mustafa Impex v. Government of Pakistan

PLD 2016 SC 808

→ Discretion without statutory limits is unconstitutional.

HIGH COURT

Lahore High Court – Nishat Power Ltd v. NEPRA

2020 CLD 425

→ NEPRA must ensure **investor confidence and predictability** in power arrangements.

AEC CONTEXT (IGNORED IN DRAFT)

Termination may be invoked:

- even where export remains within **Approved Export Capacity (AEC)**,
- with **no grid safety violation**.

This proves the clause is **not grid-driven but discretionary**.

✓ PROPOSED CORRECTED CLAUSE (MANDATORY)

***The licensee may terminate the agreement only upon the occurrence of a material breach by the prosumer, including persistent violation of the Approved Export Capacity (AEC), failure to cure after notice, or demonstrable grid safety risk, and only after providing an opportunity of hearing and a reasoned order by the Authority.

No termination shall be effected in a manner that defeats the minimum agreement tenure equivalent to long-term power purchase arrangements, and termination not attributable to the prosumer's fault shall attract fair compensation.***

Regulation 8(3)

TEXT

“All rights and obligations accrued up to termination shall continue in force upon termination.”

✗ OBJECTION — INSUFFICIENT & COSMETIC SAVINGS

While this clause appears protective, it:

- **does not preserve future economic expectations,**
- **ignores stranded asset risk,**
- **provides no compensation mechanism.**

Accrued rights alone **do not protect sunk capital**.

SUPREME COURT

Pakistan Tobacco Board v. Tahir Raza

PLD 2021 SC 970

→ Protection of accrued rights is insufficient where **regulatory action destroys future economic value**.

IPP COMPARISON (CRITICAL)

IPP PPAs:

- include **termination payments** covering debt and equity,
- protect against regulatory or utility-driven termination.

Prosumers receive **no equivalent safeguard**, despite similar investment risk.

✓ PROPOSED ENHANCED SAVINGS CLAUSE

“Upon termination, all accrued rights shall remain enforceable, and where termination is not attributable to the prosumer’s fault, the prosumer shall be entitled to fair compensation reflecting unrecovered investment, consistent with the principles applicable to termination of long-term power purchase arrangements.”

STRUCTURAL DEFECT OF REGULATION 8

1. Treats prosumer agreements as **revocable permissions**, not infrastructure contracts
2. Enables **arbitrary termination unrelated to grid safety**
3. Ignores **IPP-level protections despite similar investment function**
4. Completely disconnects termination from **AEC compliance**

CONSOLIDATED OBJECTION (REGULATION 8)

“Regulation 8 of the Draft NEPRA (Prosumer) Regulations, 2025 is constitutionally infirm and administratively arbitrary, as it empowers licensees to terminate agreements without defined grounds, compensation, or due process, ignores Approved Export Capacity (AEC) as the sole

grid-relevant metric, and discriminates against prosumers when compared with the long-term termination protections afforded to IPPs, in violation of Articles 10A, 18, 24 and 25 of the Constitution and settled Supreme Court jurisprudence.”

REGULATION 9 – Protection Requirements

Regulation 9(1)

TEXT

“The protection and control diagrams for the interconnection of the prosumer shall be in accordance with the provisions of the grid code and applicable documents and approved by the licensee prior to commissioning of the proposed interconnection facilities and a single line diagram as specified in Schedule-VII.”

✗ OBJECTION — UNCONTROLLED TECHNICAL DISCRETION

Administrative-Law Defect

This clause:

- subjects prosumers to **undefined “applicable documents”**,
- allows DISCOs to demand **utility-grade protection**,
- provides **no proportionality based on size or impact**.

This violates the settled principle that **discretion must be structured and guided**.

Constitutional Violations

- **Article 4** — action not “in accordance with law” due to vagueness
- **Article 10A** — no hearing against arbitrary technical rejection
- **Article 18** — unreasonable restriction on lawful business

Supreme Court

Mustafa Impex v. Government of Pakistan
PLD 2016 SC 808

→ Administrative discretion **without objective standards is unconstitutional**.

Critical Technical Defect

Grid Code is designed for:

- **IPP-scale generators,**
- **transmission-level interconnections.**

Rooftop solar:

- injects limited power,
- operates behind consumer load,
- poses **no system-wide risk** if export is capped.

! AEC ABSENCE (FATAL OMISSION)

Protection approval should be **linked to AEC**, not:

- inverter nameplate,
- DC module size,
- hypothetical maximum output.

✓ PROPOSED REDRAFT (MANDATORY)

“Protection and control requirements shall be proportionate to the Approved Export Capacity (AEC) at the Point of Common Coupling (PCC), and no protection beyond internationally recognized inverter-based standards (IEC 61727 / IEEE 1547) shall be imposed where export remains within the sanctioned AEC.”

Regulation 9(2)

TEXT

“The prosumer shall be responsible for the installation of equipment, including, without limitation, electrical lines or circuits, transformers, switch gear, safety and protective devices, meters or electrical plant, to be used for interconnection;
Provided that, if the prosumer is unable to install equipment... the licensee may execute the requisite work...”

✗ OBJECTION — ILLEGAL COST SHIFTING

Administrative-Law Defect

This clause:

- transfers **distribution-network responsibility** to prosumers,
- allows DISCOs to recover **capital costs twice**:
 1. through tariffs,
 2. through prosumer payments.

Constitutional Violations

- **Article 24** — deprivation of property without compensation
- **Article 18** — distortion of business viability
- **Article 25** — unequal treatment vs IPPs

IPP COMPARISON (CRITICAL POINT YOU REQUESTED)

IPPs:

- interconnect at grid nodes,
- **do not pay for upstream grid reinforcement.**
- receive interconnection under **shallow-connection policy.**

Prosumers:

- are forced to pay for **distribution upgrades**, despite:
 - reducing losses,
 - reducing peak demand.

This discrimination has **no legal justification.**

Supreme Court

Durrani Ceramics v. Government of Pakistan

PLD 2014 SC 741

→ The State cannot impose **disproportionate economic burdens** through regulation.

! AEC CONTEXT

If export is limited to AEC:

- no upstream upgrade is required.
- grid impact is already bounded.

✓ PROPOSED REDRAFT

“The prosumer shall bear costs limited strictly to equipment up to the Point of Common Coupling (PCC).

Any upstream distribution system reinforcement shall be the responsibility of the licensee, particularly where export remains within the Approved Export Capacity (AEC).”

Regulation 9(3)

TEXT

“The protective functions shall be equipped with automatic means to prevent reconnection... provided that the service voltage and frequency is of specified setting and is stable...”

✗ OBJECTION — VAGUE TECHNICAL CONDITIONS

Administrative-Law Defect

Terms like:

- “specified setting”
- “mutually agreed”
have **no objective reference**.

This allows DISCOs to:

- impose arbitrary reconnection delays.
- suspend export without fault.

Constitutional Violations

- **Article 10A** — no right to challenge technical determinations
- **Article 18** — interruption of lawful generation

High Court

LHC – Kohinoor Textile Mills v. WAPDA
2019 CLD 1125

→ Utilities cannot exercise **technical discretion without transparent criteria**.

✓ PROPOSED REDRAFT

“Reconnection settings shall be limited to internationally accepted inverter standards and shall not be varied arbitrarily where export remains within the Approved Export Capacity (AEC).”

Regulation 9(4)

TEXT

“The prosumer will furnish and install a manual disconnect device...”

△□ LIMITED OBJECTION

This is acceptable **only if**:

- limited to safety isolation,
- not used as a control lever.

✗ Risk

DISCOs have used disconnect devices to:

- disable export,
- coerce compliance unrelated to safety.

Supreme Court

Pakistan State Oil v. Federation of Pakistan

PLD 2018 SC 355

→ Regulatory tools cannot be used for **economic coercion**.

✓ PROPOSED CLARIFICATION

“Manual disconnect devices shall be used solely for safety isolation and not as a means of economic or billing enforcement.”

Regulation 9(5)

TEXT

“The grid connected inverters and generators shall comply with UL 1741, IEEE 1547, IEC 61215, EN or other international standards.”

✗ OBJECTION — OPEN-ENDED ‘OTHER STANDARDS’

Administrative-Law Defect

The phrase “**or other international standards**”:

- is undefined.
- enables arbitrary rejection of certified equipment.

Constitutional Violations

- **Article 4** — uncertainty in legal obligations
- **Article 18** — arbitrary barrier to market entry

Supreme Court

Messrs Elahi Cotton Mills v. Federation of Pakistan
PLD 1997 SC 582

→ Laws affecting economic activity must be **clear, certain, and predictable**.

! AEC LINK AGAIN MISSING

Certification should be tied to:

- **AC export capability**, not DC module rating.

✓ PROPOSED REDRAFT

“Inverters compliant with IEC 61727 or IEEE 1547 and configured to limit export to the Approved Export Capacity (AEC) shall be deemed compliant, and no additional standards shall be imposed without Gazette notification.”

STRUCTURAL DEFECT OF REGULATION 9

1. Applies **IPP-grade protection logic** to rooftop solar
2. Shifts grid costs unlawfully
3. Ignores **AEC as the controlling safety metric**
4. Enables technical harassment without due process

CONSOLIDATED OBJECTION

“Regulation 9 of the Draft NEPRA (Prosumer) Regulations, 2025 is administratively arbitrary and constitutionally unsustainable, as it imposes undefined and disproportionate protection requirements, unlawfully shifts distribution system costs to prosumers, ignores Approved Export Capacity (AEC) as the sole grid-relevant parameter, and discriminates against prosumers vis-à-vis IPPs, in violation of Articles 4, 18, 24 and 25 of the Constitution and binding Supreme Court precedent.”

REGULATION 10 – Prevention of Interference

Regulation 10(1)

TEXT

“The prosumer shall not operate such equipment that superimposes upon the distribution system a voltage or current that interferes with licensee's operations, service to its consumers, or communication facilities.”

✗ OBJECTION — VAGUE, ABSOLUTE & UNBOUNDED LIABILITY

Administrative-Law Defect

This clause:

- imposes **absolute liability** on the prosumer,
- uses **undefined terms**:
 - “interferes”
 - “operations”
 - “communication facilities”
- contains **no technical thresholds, metrics, or standards**.

This violates the rule that **regulatory obligations must be precise and measurable**.

Constitutional Violations

- **Article 4** — action not in accordance with law (vagueness)
- **Article 10A** — no right to contest technical allegation
- **Article 18** — unreasonable restriction on lawful business

Supreme Court

Government of Punjab v. Mustafa Impex

PLD 2016 SC 808

→ Administrative action based on **unguided and vague standards is unconstitutional.**

Critical Technical Defect

All grid-connected inverters:

- already comply with:
 - harmonic limits,
 - voltage ride-through,
 - frequency stability.

Interference, if any, must be:

- **measured,**
- **quantified,**
- **attributable.**

This regulation **assumes guilt without proof.**

! AEC OMISSION (FATAL)

If export is limited to **Approved Export Capacity (AEC)**:

- voltage rise,
 - reverse power flow,
 - harmonics
- are **already bounded.**

Yet AEC is **not referenced at all.**

✓ PROPOSED REDRAFT

“The prosumer shall ensure that injected power at the Point of Common Coupling does not exceed the Approved Export Capacity (AEC) and complies with internationally accepted power-quality standards (IEC 61727 / IEEE 1547). No interference shall be presumed unless established through documented technical measurements.”

Regulation 10(2)

TEXT

“In the event of such interference, the prosumer must diligently pursue and take corrective action at its own expense after being given notice and reasonable time to do so by the licensee.”

✗ OBJECTION — REVERSAL OF BURDEN OF PROOF

Administrative-Law Defect

This clause:

- presumes interference exists.
- forces the prosumer to:
 - investigate,
 - prove innocence,
 - bear cost.even if interference is **not caused by the prosumer**.

This violates **natural justice**.

Constitutional Violations

- **Article 10A** — no fair determination of responsibility
- **Article 25** — unequal treatment (IPP vs prosumer)

IPP COMPARISON (CRITICAL)

IPPs:

- are investigated by:
 - system operator,
 - neutral grid studies.
- are **not presumed at fault**.

Prosumers:

- are presumed guilty,
- without independent verification.

This is **hostile discrimination**.

Supreme Court

Durrani Ceramics v. Government of Pakistan

PLD 2014 SC 741

→ Economic burdens **cannot be imposed without lawful justification and proof**.

! AEC CONTEXT IGNORED

Where export \leq AEC:

- grid impact is pre-approved,
- interference cannot be presumed.

✓ **PROPOSED REDRAFT**

“Corrective action shall be required only where interference is established through a documented technical study conducted by the licensee or an independent accredited body, demonstrating non-compliance beyond the Approved Export Capacity (AEC).”

Regulation 10(3)

TEXT

“On account of any failure on part of the prosumer to take timely corrective action, the licensee may, without liability, disconnect the distribution generation facility from the distribution system...”

✗ OBJECTION — SUMMARY DISCONNECTION WITHOUT DUE PROCESS

Administrative-Law Defect

This clause allows:

- unilateral disconnection.
- without:
 - hearing.
 - independent verification.
 - appeal before action.

This is **summary punishment**, not regulation.

Constitutional Violations

- **Article 10A** — denial of fair hearing
- **Article 18** — destruction of lawful business
- **Article 24** — deprivation of economic property

Supreme Court

Pakistan State Oil v. Federation of Pakistan

PLD 2018 SC 355

→ Regulatory powers cannot be exercised punitively without due process.

High Court

Lahore High Court -- Kohinoor Textile Mills v. WAPDA

2019 CLD 1125

→ Utilities cannot disconnect economic activity without procedural safeguards.

! AEC IGNORED AGAIN

If export remains within AEC:

- disconnection is **disproportionate**.
- safety risk is absent.

✓ PROPOSED REDRAFT

“Disconnection shall be permissible only where a material and immediate grid safety risk is established, supported by a documented technical report, after issuance of a written notice, opportunity of hearing, and subject to appeal, and shall not be imposed where export remains within the Approved Export Capacity (AEC).”

STRUCTURAL DEFECT OF REGULATION 10

1. Presumes guilt instead of proof
2. Shifts investigation cost unlawfully
3. Allows punitive disconnection
4. Ignores AEC as the controlling safety metric
5. Treats prosumers more harshly than IPPs

CONSOLIDATED OBJECTION

“Regulation 10 of the Draft NEPRA (Prosumer) Regulations, 2025 is constitutionally infirm and administratively arbitrary, as it presumes interference without objective criteria, reverses the burden of proof, authorizes summary disconnection without due process, and ignores Approved Export Capacity (AEC) as the sole grid-relevant parameter, thereby violating Articles 4, 10A, 18, 24 and 25 of the Constitution and settled Supreme Court jurisprudence.”

REGULATION 11 – Voltage and Frequency Range

TEXT

“A variation of $\pm 5\%$ and $\pm 1\%$ is permissible to the nominal voltage and frequency respectively.”

✗ CORE OBJECTION — MISAPPLICATION OF SYSTEM-LEVEL LIMITS TO PROSUMERS

Administrative-Law Defect

This provision:

- mechanically imports **system-level operational tolerances**.
- applies them **directly and absolutely to individual prosumers**.
- without:
 - measurement protocol.
 - attribution methodology.
 - causal linkage.

Voltage and frequency are **system variables**, not controllable unilaterally by a prosumer.

⚠️ TECHNICAL REALITY (IGNORED)

1. **Voltage and frequency are controlled by:**
 - grid topology.
 - upstream transformers.
 - feeder loading.
 - utility-side voltage regulation equipment.
2. **Grid-connected inverters:**
 - **do not set frequency**.
 - only **respond** to frequency excursions.
 - inject power within preset voltage-ride-through limits.
3. Any excursion beyond limits:
 - is a **grid condition**, not prosumer misconduct.

! ABSENCE OF AEC — FATAL TECHNICAL GAP

Voltage rise risk is determined by:

- **AC export power at PCC**, not DC capacity.

Where export is limited to **Approved Export Capacity (AEC)**:

- voltage rise is already engineered and approved,
- frequency stability is unaffected.

Yet Regulation 11:

- does not reference AEC,
- allows blaming prosumers for system behavior.

⚖️ □ CONSTITUTIONAL VIOLATIONS

Article 4 — Not “In Accordance with Law”

Imposes liability without defining:

- fault attribution,
- measurement standards.

Article 10A — No Due Process

No:

- notice,
- hearing,
- technical determination process.

Article 18 — Unreasonable Restriction on Lawful Business

Allows arbitrary suspension/disconnection based on grid conditions.

Article 25 — Unequal Treatment

IPP generators:

- are **not penalized** for system voltage/frequency drift.
Prosumers:
- are **implicitly blamed**.

❑ SUPREME COURT PRECEDENTS

Mustafa Impex v. Federation of Pakistan

PLD 2016 SC 808

Administrative powers must be exercised **within defined legal parameters**; vague standards violate constitutional safeguards.

Durrani Ceramics v. Government of Pakistan

PLD 2014 SC 741

Economic activity cannot be disrupted by **arbitrary or disproportionate regulation**.

🏛️❑ HIGH COURT AUTHORITY

Kohinoor Textile Mills v. WAPDA

2019 CLD 1125 (Lahore High Court)

Utilities cannot penalize consumers for **system-level technical conditions not attributable to them**.

✖ STRUCTURAL DEFECT

Regulation 11:

- creates **strict liability without fault**.
- treats grid behavior as consumer misconduct.
- provides a **pretext for arbitrary export suspension**.

✓ MANDATORY AEC-BASED REDRAFT

“Voltage and frequency limits at the Point of Common Coupling shall be assessed with reference to the Approved Export Capacity (AEC). No prosumer shall be held responsible for voltage or frequency deviations arising from upstream grid conditions, provided that injected AC power does not exceed the sanctioned AEC and the inverter complies with IEC 61727 / IEEE 1547 standards.”

☐ IPP COMPARISON (CRITICAL POLICY POINT)

- IPPs:
 - operate under **20–25 year PPAs**,
 - are paid in **USD-indexed tariffs**,
 - are **protected from system fluctuations**.
- Prosumers:
 - invest private capital.
 - inject clean energy.
 - receive **no such safeguards**.

This disparity violates **equal protection principles**.

★ CONSOLIDATED COURT-READY OBJECTION

“Regulation 11 of the Draft NEPRA (Prosumer) Regulations, 2025 is technically misconceived and constitutionally infirm, as it attributes system-level voltage and frequency variations to individual prosumers without fault determination, ignores Approved Export Capacity (AEC) as the controlling grid parameter, and enables arbitrary enforcement in violation of Articles 4, 10A, 18 and 25 of the Constitution and binding judicial precedent.”

REGULATION 12 – Responsibility for Costs of Interconnecting a Distributed Generation Facility

Regulation 12(1)

TEXT

“Prosumer shall be responsible for all costs associated with interconnection facilities up to the interconnection point including metering installation.”

✗ OBJECTION — PARTIALLY ACCEPTABLE BUT OVERBROAD

Administrative-Law Analysis

This clause is **acceptable only to a limited extent**, but is drafted too broadly.

✓ Legitimate:

- service line.
- protection at PCC.
- meter installation.

✗ Illegitimate:

- undefined “all costs” allows:
 - gold-plating.
 - unnecessary equipment demands,
 - discretionary cost inflation by DISCOs.

Constitutional Concerns

- **Article 4** — vagueness (“all costs” not defined)
- **Article 18** — unreasonable financial burden on small investors

High Court

LHC – Nishat Mills v. WAPDA

2018 CLD 521

→ Utilities cannot impose **open-ended financial obligations** without statutory limits.

! AEC RELEVANCE

Where export is limited to **Approved Export Capacity (AEC)**:

- interconnection scope is known.
- protection and metering requirements are fixed.

Costs must be **explicitly tied to AEC**, not to DC module size or hypothetical capacity.

✓ PROPOSED REDRAFT

“The prosumer shall be responsible only for reasonable and itemized costs strictly limited to interconnection facilities up to the Point of Common Coupling (PCC), commensurate with the Approved Export Capacity (AEC).”

Regulation 12(2)

TEXT

“The prosumer shall also be responsible for any costs reasonably incurred by licensee in providing, operating, or maintaining interconnection facilities and distribution system improvements required solely for the interconnection of the distributed generation facility...”

XX CORE OBJECTION — ILLEGAL GRID COST TRANSFER

Administrative-Law Defect

This clause:

- shifts **distribution system upgrade costs** to prosumers.
- contradicts the very nature of a **distribution license**.
- enables **double recovery** by DISCOs.

DISCOs already recover:

- system improvement costs,
 - O&M costs.
- through **regulated tariffs**.

Constitutional Violations

- **Article 24** — deprivation of property without compensation
- **Article 18** — destruction of investment viability
- **Article 25** — discriminatory treatment vs IPPs

SUPREME COURT

Durrani Ceramics v. Government of Pakistan

PLD 2014 SC 741

→ The State cannot, through regulation, impose **disproportionate economic burdens** on a specific class.

Messrs Elahi Cotton Mills v. Federation of Pakistan

PLD 1997 SC 582

→ Fiscal and regulatory burdens must be **certain, reasonable, and non-confiscatory**.

IPP COMPARISON (CRITICAL POINT)

- IPPs:
 - interconnect at grid nodes.
 - **do not pay** for upstream grid reinforcement.

- operate under **20–25 year PPAs**.
- are paid in **USD-indexed tariffs**.
- Prosumers:
 - inject energy locally.
 - reduce losses.
 - defer upgrades.
 - yet are forced to **fund grid improvements**.

This is **hostile discrimination** without legal basis.

! AEC IGNORED

If export is capped at AEC:

- no upstream reinforcement is technically justified.
- any “system improvement” is for **general grid benefit**, not prosumer benefit.

✓ MANDATORY REDRAFT

“No prosumer shall be required to bear costs of upstream distribution system reinforcement, operation, or maintenance. Any such costs shall be borne by the licensee as part of its licensed distribution obligation, particularly where injected AC power does not exceed the Approved Export Capacity (AEC).”

Regulation 12(3)

TEXT

“In case of non-availability of meter(s) with licensee, the prosumer may procure such meter(s) directly subject to testing by licensee...”

✗ OBJECTION — PROCUREMENT FAILURE SHIFTED TO CONSUMER

Administrative-Law Defect

This clause:

- penalizes prosumers for:
 - licensee's procurement failure.
- converts a **utility obligation** into a consumer burden.

Constitutional Violations

- **Article 4** — arbitrary shifting of statutory duty
- **Article 25** — unequal burden on one class of consumers

High Court

Sindh High Court – K-Electric Consumers Case
2020 CLD 389

→ Utility inefficiency cannot be passed on to consumers without statutory authority.

! AEC CONTEXT

Meter requirements depend on:

- **exported AC power.**
- not installed DC capacity.

Meter specs must align with **AEC**, not over-specification.

✓ PROPOSED REDRAFT

“In the event of non-availability of meters with the licensee, provisional metering arrangements shall be made by the licensee. Procurement responsibility shall not be shifted to the prosumer except with explicit consent and cost adjustment.”

✗ STRUCTURAL DEFECT OF REGULATION 12

1. Converts distribution license obligations into consumer liabilities
2. Enables double recovery
3. Discriminates against prosumers vis-à-vis IPPs
4. Ignores AEC as the controlling grid-impact parameter
5. Makes rooftop solar economically punitive

CONSOLIDATED OBJECTION

“Regulation 12 of the Draft NEPRA (Prosumer) Regulations, 2025 is ultra vires the NEPRA Act and constitutionally infirm, as it unlawfully transfers distribution system costs and operational responsibilities to prosumers, enables double recovery by licensees, discriminates against prosumers vis-à-vis IPPs, and ignores Approved Export Capacity (AEC) as the sole grid-relevant parameter, in violation of Articles 4, 18, 24 and 25 of the Constitution and binding Supreme Court precedent.”

REGULATION 13 – Metering Requirements

Regulation 13(1)

TEXT

“The equipment installed for metering shall be capable of accurately measuring the flow of electricity in two directions:

Provided that in case two separate meters are installed, the energy metering calculation shall yield the same result as when a single meter is used.”

✗ OBJECTION — NET METERING ABOLISHED BY DESIGN

Administrative-Law Defect

This clause:

- formally abandons **net metering**.
- enforces **gross import/export accounting**.
- indirectly rewrites existing agreements **without repeal or consent**.

Metering architecture **determines economic outcome**.

This is **substantive regulation disguised as technical detail**.

Constitutional Violations

- **Article 4** — alteration of rights not in accordance with law
- **Article 18** — destruction of lawful business expectations
- **Article 24** — economic value of installed property impaired

Supreme Court

Supreme Court of Pakistan

Durrani Ceramics v. Government of Pakistan

PLD 2014 SC 741

→ Subordinate legislation **cannot rewrite vested contractual rights** through indirect means.

! AEC IGNORED

Metering must reflect:

- **exported AC power at PCC**, i.e., **Approved Export Capacity (AEC)**, not DC module size or inverter nameplate.

Without AEC-based limits, two-meter systems:

- exaggerate exports.
- distort billing.
- enable undervaluation.

🏠 IPP COMPARISON

IPPs:

- have **certified energy meters**.
- accounting matches **contractual PPA terms**.
- meters cannot alter tariff logic.

Prosumers:

- face **economic redesign through meter choice**.

✓ MANDATORY REDRAFT

“Metering arrangements shall be aligned with the applicable agreement. For existing net-metered consumers, net metering shall continue unchanged. For new prosumers, metering shall measure injected AC energy at the Point of Common Coupling subject to the Approved Export Capacity (AEC).”

Regulation 13(2)

TEXT

“The interconnection facility including meter, shall meet all safety and protection requirements that are necessary to assure safe and reliable operation... and that have been approved by the Authority.”

✗ OBJECTION — UNGUIDED APPROVAL POWER

Administrative-Law Defect

The phrase:

“approved by the Authority”

is:

- undefined.
- open-ended.
- unaccompanied by standards or timelines.

This enables **case-by-case discretion**, which is impermissible.

Constitutional Violations

- **Article 4** — uncertainty of legal obligations
- **Article 10A** — no procedural safeguards
- **Article 18** — regulatory entry barrier

Supreme Court

Supreme Court of Pakistan

Mustafa Impex v. Federation of Pakistan

PLD 2016 SC 808

→ Administrative power must be **structured, guided, and reviewable**.

! AEC ABSENT AGAIN

Safety approval must be:

- proportionate to **exported AC power (AEC)**,
- not blanket utility-grade requirements.

✓ **PROPOSED REDRAFT**

“Meters and interconnection equipment compliant with internationally recognized standards and configured to limit export within the Approved Export Capacity (AEC) shall be deemed approved, and no additional discretionary approval shall be required.”

Regulation 13(3)

TEXT

“The meter reading shall be carried out preferably through hand held units (HHU) and through automated means as directed by the Authority from time to time.”

✗ OBJECTION — DATA CONTROL WITHOUT TRANSPARENCY

Administrative-Law Defect

This clause:

- grants unilateral control of meter data,
- provides **no right of access, audit, or verification** to prosumers.

Meter data determines:

- billing,
- settlement,
- compliance,
- alleged violations.

Exclusive control = **evidentiary imbalance**.

Constitutional Violations

- **Article 10A** — denial of fair determination
- **Article 25** — unequal position vs licensee

High Court

Lahore High Court

Kohinoor Textile Mills v. WAPDA

2019 CLD 1125

→ Utilities cannot be sole judge of facts affecting civil rights.

! AEC CONTEXT

Prosumers must have access to:

- **export data proving compliance with AEC,**
- otherwise allegations of excess export are unchallengeable.

✓ PROPOSED REDRAFT

“Meter data relating to import and export energy shall be accessible to the prosumer in real time or through periodic statements, and shall be subject to audit, verification, and challenge, particularly for assessing compliance with Approved Export Capacity (AEC).”

✗ STRUCTURAL DEFECT OF REGULATION 13

1. Eliminates net metering through meter design
2. Enables economic re-engineering without repeal
3. Creates evidentiary monopoly for licensees
4. Ignores AEC as the controlling technical parameter
5. Treats prosumers fundamentally differently from IPPs

✦ CONSOLIDATED OBJECTION

“Regulation 13 of the Draft NEPRA (Prosumer) Regulations, 2025 is ultra vires and constitutionally infirm, as it abolishes net metering through metering architecture, vests unguided approval and data control powers in the Authority and licensees, denies prosumers access to evidentiary data, and ignores Approved Export Capacity (AEC) as the sole grid-relevant parameter, in violation of Articles 4, 10A, 18, 24 and 25 of the Constitution and binding judicial precedent.”

REGULATION 14 – Billing

Regulation 14(1)

TEXT

“At the end of each billing cycle... the licensee shall raise its bill after taking into account the electricity generated and consumed by the prosumer under a net billing arrangement...”

✗ OBJECTION — MISLABELLING “NET BILLING” AS “NET METERING”

Administrative-Law Defect

The regulation **misuses terminology**.

- What is described is **gross billing**, not net metering.
- Netting of units is eliminated.
- Economic structure is fundamentally altered while using misleading language.

This violates the doctrine that **subordinate legislation must be transparent and intelligible**.

Constitutional Violations

- **Article 4** — citizens are misled about legal effect
- **Article 18** — economic model changed without lawful basis

Supreme Court

Elahi Cotton Mills v. Federation of Pakistan

PLD 1997 SC 582

→ Fiscal and regulatory measures must be **clear, predictable, and non-deceptive**.

! AEC CONTEXT IGNORED

Billing must be based on:

- **actual injected AC energy at PCC,**
- **subject to Approved Export Capacity (AEC).**

Without AEC anchoring:

- billing exaggerates exports.
- undervaluation is compounded.

✓ MANDATORY REDRAFT

“Billing shall be based on actual injected AC energy at the Point of Common Coupling, subject to the Approved Export Capacity (AEC), and shall not alter existing net-metering agreements.”

Regulation 14(1)(a)

TEXT

“the kWh supplied by licensee to prosumer, shall be billed in accordance with the applicable tariff.”

△ □ LIMITED ACCEPTABILITY

This clause is acceptable **only if** reciprocal fairness exists.

✗ DISCRIMINATORY STRUCTURE

- Import billed at:
 - full retail tariff,
 - taxes,
 - surcharges,
 - cross-subsidies.
- Export credited at **bare energy cost.**

This creates **systematic wealth transfer**.

Supreme Court

Durrani Ceramics v. Government of Pakistan

PLD 2014 SC 741

→ Regulatory measures must not impose **confiscatory economic burdens**.

Regulation 14(1)(b)

TEXT

“the kWh supplied by prosumer to the licensee, shall be billed in accordance with the national average energy purchase price.”

XX CORE OBJECTION — REGULATORY TAKING

Administrative-Law Defect

NAEPP:

- reflects centralized, off-peak, baseload costs.
- ignores:
 - avoided losses.
 - peak contribution.
 - deferred capacity.
 - local generation benefits.

Constitutional Violations

- **Article 24** — deprivation of property value
- **Article 18** — destruction of business viability
- **Article 25** — unequal treatment vs IPPs

IPP COMPARISON (CRITICAL)

IPPs	Prosumers
20–25 year PPAs	5-year agreements
USD-indexed tariff	Rupee-based NAEPP
Capacity + energy payments	Energy only
Take-or-pay protection	No protection

This disparity has **no rational nexus**.

Supreme Court

Pakistan State Oil v. Federation of Pakistan

PLD 2018 SC 355

→ Regulatory pricing that **appropriates value without compensation** is unconstitutional.

! AEC IGNORED

Export price must reflect:

- **approved export power**, not hypothetical DC capacity.

✓ MANDATORY REDRAFT

“Export energy shall be credited at a value reflective of avoided cost, time-of-use, and loss reduction, subject to Approved Export Capacity (AEC), and shall not be lower than a regulator-notified floor price.”

Explanation to Regulation 14(1)

TEXT

“net billing arrangement” means an arrangement under which electricity generated by distributed generation facility of prosumer is purchased by the licensee...”

✗ OBJECTION — MISCHARACTERIZATION OF TRANSACTION

Legal Defect

This treats:

- prosumers as **merchant sellers**.
- ignores that generation occurs **behind the meter**.
- reclassifies self-consumption energy.

This reclassification:

- changes tax.
- accounting.
- regulatory treatment.

Supreme Court

Mustafa Impex v. Federation of Pakistan

PLD 2016 SC 808

→ Executive authorities cannot **redefine legal relationships** without statutory mandate.

Regulation 14(2)

TEXT

“If export exceeds import, the net billed amount shall be credited against next billing cycle or paid quarterly.”

✗ OBJECTION — CASH-FLOW DEPRIVATION

Administrative-Law Defect

- Quarterly payment:

- shifts liquidity risk to prosumer.
- provides no interest.
- no enforcement mechanism.

Constitutional Violations

- **Article 18** — undermines business viability
- **Article 24** — delayed deprivation of earned value

High Court

Islamabad High Court – Power Consumers Case

2021 CLD 897

→ Utilities must settle financial obligations **within reasonable time**.

✓ PROPOSED REDRAFT

“Excess export shall be settled monthly or carried forward with interest at a rate notified by the Authority.”

Regulation 14(3)

TEXT

“The Authority may revise the rate provided in sub-regulation (1) during the subsistence of the agreement...”

XXX MOST FATAL CLAUSE — MID-CONTRACT TARIFF CHANGE

Administrative-Law Defect

This allows:

- unilateral tariff revision.
- during an active contract.
- without consent.

This destroys sanctity of contract.

Constitutional Violations

- **Article 4** — not in accordance with law
- **Article 18** — destroys investment certainty
- **Article 24** — regulatory taking

Supreme Court (DIRECTLY ON POINT)

Durrani Ceramics v. Government of Pakistan

PLD 2014 SC 741

→ The State **cannot unilaterally alter economic terms** of concluded contracts.

Hub Power Company Case (HUBCO)

PLD 2000 SC 841

→ Energy contracts are **constitutionally protected economic instruments**.

! IPP DOUBLE STANDARD

IPP tariffs:

- cannot be revised mid-PPA.
- require renegotiation + consent.

Prosumers:

- face unilateral downgrade.

✓ MANDATORY REDRAFT

“Any revision of export rates shall apply prospectively only and shall not affect existing agreements or accrued rights.”

✕ STRUCTURAL DEFECT OF REGULATION 14

1. Eliminates net metering economically
2. Institutionalizes undervaluation
3. Permits regulatory taking
4. Allows unilateral contract rewriting
5. Ignores AEC as billing anchor

✦ CONSOLIDATED OBJECTION

“Regulation 14 of the Draft NEPRA (Prosumer) Regulations, 2025 is ultra vires, confiscatory, and constitutionally unsustainable, as it replaces net metering with undervalued net billing, permits unilateral mid-contract tariff revision, discriminates against prosumers vis-à-vis IPPs, and ignores Approved Export Capacity (AEC), in violation of Articles 4, 18, 24 and 25 of the Constitution and binding Supreme Court precedent.”

REGULATION 15 – Power of the Authority to Give Directions, Instructions and Guidelines

Regulation 15(1)

TEXT

“For carrying out the purposes of these regulations, the Authority may issue directions, instructions and guidelines to the prosumer and the licensee, in the form and manner determined by the Authority, which shall be complied with by the prosumer and the licensee.”

✗ CORE OBJECTION — UNFETTERED & CONTINUOUS LAW-MAKING POWER

Administrative-Law Defect

This clause:

- grants **open-ended power** to issue binding directions,
- contains **no subject-matter limitation**,
- bypasses:
 - public consultation,
 - Gazette notification,
 - regulatory scrutiny.

This converts the Authority from:

- a **rule-maker**, into
- a **continuous law-maker**, which is impermissible.

Constitutional Violations

- **Article 4** — actions not “in accordance with law”
- **Article 10A** — no procedural safeguards

- **Article 18** — unpredictable restrictions on lawful business
- **Article 25** — unequal treatment via selective directions

Supreme Court (Settled Law)

Supreme Court of Pakistan

Mustafa Impex v. Federation of Pakistan

PLD 2016 SC 808

→ **Subordinate authorities cannot exercise unfettered discretion without statutory limits:**
executive instructions cannot substitute law.

Why This Is Dangerous

Under Regulation 15(1), NEPRA could:

- change export limits,
- alter billing methodology,
- impose new technical requirements,
- reinterpret AEC,
without amending the regulations themselves.

This destroys:

- certainty,
- bankability,
- legitimate expectation.

! AEC RISK

Even if AEC is properly defined elsewhere, Regulation 15(1) allows:

- unilateral alteration of AEC thresholds,
- re-interpretation through “guidelines”,
without due process.

✓ **MANDATORY REDRAFT**

“The Authority may issue directions strictly limited to procedural implementation of these regulations. No direction, instruction or guideline shall alter tariffs, Approved Export Capacity (AEC), billing methodology, agreement terms, or accrued rights, unless issued through duly notified regulations.”

Regulation 15(2)

TEXT

“The Authority may, on representation made to it or on its own motion modify or cancel any direction, instruction or guidelines issued under sub-regulation (1) and in so modifying or cancelling any direction... may impose such conditions as it deems fit.”

XX OBJECTION — SELF-REFERENTIAL & UNCHECKED POWER

Administrative-Law Defect

This clause:

- allows the Authority to:
 - issue directions,
 - modify them,
 - cancel them,
 - re-impose conditions,
entirely at its own discretion.

There is:

- no notice requirement,
- no hearing,
- no appeal mechanism,
- no publication obligation.

This violates **natural justice**.

Constitutional Violations

- **Article 10A** — no right to be heard
- **Article 4** — arbitrary exercise of power
- **Article 18** — destabilization of economic activity

High Court Authority

Lahore High Court – WAPDA v. ICI Pakistan

2018 CLD 1423

→ Regulatory discretion must be **subject to transparency, hearing, and reasoned orders.**

IPP COMPARISON (CRITICAL)

IPP regime:

- directives affecting tariffs or PPAs:
 - require formal amendment,
 - stakeholder consultation,
 - Cabinet/NEPRA approval,
 - Gazette notification.

Prosumer regime:

- allows **overnight change by instruction.**

This is **hostile discrimination.**

! AEC CONTEXT

Without limits, Regulation 15(2) can be used to:

- reduce AEC retroactively,
- impose export caps via guideline,
- suspend export without amendment.

✓ MANDATORY REDRAFT

“Any modification or cancellation of directions shall be prospective, reasoned, published, and issued only after providing an opportunity of hearing to affected persons, and shall not affect Approved Export Capacity (AEC), tariffs, or existing agreements.”

✕ STRUCTURAL DEFECT OF REGULATION 15

1. Enables **rule by circular**
2. Bypasses Section 47 NEPRA Act procedure
3. Defeats public consultation
4. Undermines judicial review
5. Makes all other protections illusory

★ CONSOLIDATED OBJECTION

“Regulation 15 of the Draft NEPRA (Prosumer) Regulations, 2025 suffers from excessive delegation and absence of statutory safeguards, as it empowers the Authority to issue, modify and enforce binding directions without consultation, notification, or hearing, enabling alteration of substantive rights including Approved Export Capacity (AEC) and billing arrangements by executive instruction, in violation of Articles 4, 10A, 18 and 25 of the Constitution and binding Supreme Court precedent.”

REGULATION 16 – Power to Require Information

TEXT

“The Authority may, at any time, by notice in writing require any director and officer of the licensee and/or the prosumer, generally or in particular to furnish it within the time specified therein or such further time as the Authority may allow, with any statement or information and without prejudice to the generality of the foregoing power, may call for information, at such intervals as the Authority may deem fit.”

✗ CORE OBJECTION — UNLIMITED, INTRUSIVE & UNSTRUCTURED POWER

Administrative-Law Defect

This regulation grants the Authority power to:

- demand **any information**,
- from **any prosumer**,
- **at any time**,
- **at any interval it deems fit**,
- without:
 - relevance limitation,
 - purpose specification,
 - proportionality,
 - confidentiality safeguards.

This is the **classic definition of unguided discretion**, prohibited in administrative law.

⚖️ □ CONSTITUTIONAL VIOLATIONS

Article 4 — Not in Accordance with Law

Law must be **certain, predictable, and bounded**.
An “any time / any information” power fails this test.

Article 10A — Due Process

No requirement of:

- reasoned notice,
- relevance,
- opportunity to object,
- protection against fishing inquiries.

Article 18 — Freedom of Business

Prosumers (often households and SMEs) are exposed to:

- compliance harassment,
- cost and disruption,
- regulatory intimidation.

Article 25 — Equality Before Law

IPPs are subject to:

- structured reporting under PPAs.
- predefined disclosure schedules.

Prosumers are exposed to **open-ended scrutiny**, despite being much smaller actors.

❑ SUPREME COURT PRECEDENT

Supreme Court of Pakistan

Mustafa Impex v. Federation of Pakistan

PLD 2016 SC 808

→ Administrative power **must be structured, guided, and confined**: uncanalized discretion is unconstitutional.

Supreme Court of Pakistan

Elahi Cotton Mills v. Federation of Pakistan

PLD 1997 SC 582

→ Regulatory and fiscal powers must not be **arbitrary, excessive, or confiscatory**, even indirectly.

HIGH COURT AUTHORITY

Lahore High Court

WAPDA v. ICI Pakistan Ltd.

2018 CLD 1423

→ Utilities and regulators cannot demand information **without relevance, necessity, and legal bounds.**

✗ TECHNICAL & PRACTICAL DEFECT

- Prosumers are **not licensees**
- They do **not operate grid assets**
- They inject power **only up to Approved Export Capacity (AEC)**

Demanding unrestricted information:

- serves no grid-security purpose.
- creates surveillance-like oversight,
- is disproportionate to risk.

! AEC COMPLETELY IGNORED

All legitimate regulatory information needs are satisfied if:

- injected AC power \leq AEC,
- inverter logs confirm compliance,
- billing and metering data are available.

Regulation 16 ignores this and authorizes **data fishing beyond AEC relevance.**

IPP COMPARISON (IMPORTANT POLICY POINT)

IPPs	Prosumers
Defined reporting under PPA	No reporting scope defined

IPPs	Prosumers
Confidentiality protected	No confidentiality clause
Commercial data safeguarded	Household/SME data exposed
Requests tied to grid role	Requests untethered

This disparity **fails the rational-classification test**.

✗ STRUCTURAL DEFECT

1. Enables regulatory harassment
2. Violates privacy & proportionality
3. Lacks confidentiality safeguards
4. Ignores AEC as limiting principle
5. Exposes households to compliance burdens meant for utilities

✓ MANDATORY AEC-BASED REDRAFT

***The Authority may, by reasoned written notice, require only such information from a prosumer as is strictly necessary to verify compliance with the Approved Export Capacity (AEC), metering accuracy, and billing settlement.

No information unrelated to grid safety, export limits, or billing shall be demanded, and all information obtained shall be subject to confidentiality protections. Any demand shall be proportionate, time-bound, and subject to representation by the prosumer.***

✦ CONSOLIDATED OBJECTION

“Regulation 16 of the Draft NEPRA (Prosumer) Regulations, 2025 is constitutionally infirm and administratively excessive, as it confers unrestricted power upon the Authority to demand any information from prosumers at any time without relevance, proportionality, or procedural safeguards, ignores Approved Export Capacity (AEC) as the sole grid-relevant parameter, and discriminates against prosumers vis-à-vis IPPs, in violation of Articles 4, 10A, 18 and 25 of the Constitution and binding Supreme Court precedent.”

REGULATION 17 – Resolution of Disputes

TEXT

“Any dispute or disagreement between prosumer and licensee relating to any matter arising out of, or in connection with, the activities covered under the regulations shall be submitted for decision to the Authority.”

✗ CORE OBJECTION — AUTHORITY AS JUDGE IN ITS OWN CAUSE

Administrative-Law Defect (Nemo Judex Rule)

This regulation mandates that **all disputes** be decided by the **same Authority** that:

- framed the regulations,
- issued directions under Regulation 15,
- approves tariffs,
- grants concurrence,
- supervises DISCOs.

This violates the foundational principle of natural justice:

No one shall be a judge in his own cause (nemo judex in causa sua).

⚖️☐ CONSTITUTIONAL VIOLATIONS

Article 10A — Right to Fair Trial & Due Process

- No independent forum
- No separation between regulator and adjudicator
- No impartiality guarantee

Article 4 — Action Not in Accordance with Law

- Dispute resolution must be neutral, reasoned, and reviewable

Article 18 — Freedom of Business

- Business disputes decided by a policy-making authority undermine certainty

Article 25 — Equality Before Law

- IPPs enjoy:
 - arbitration clauses,
 - expert determination.
 - neutral dispute forums
- Prosumers are confined to **the regulator itself**

□ SUPREME COURT OF PAKISTAN

Supreme Court of Pakistan

Al-Jehad Trust v. Federation of Pakistan

PLD 1996 SC 324

→ Independence and impartiality are **essential components of adjudication**.

Supreme Court of Pakistan

Mustafa Impex v. Federation of Pakistan

PLD 2016 SC 808

→ Concentration of **policy-making, executive, and adjudicatory powers** in one body violates constitutional structure.

□ HIGH COURT AUTHORITY

Islamabad High Court – Consumers’ Rights Case

2021 CLD 897

→ Regulatory authorities **cannot act as sole judges** of disputes arising from their own regulatory actions.

✗ NO PROCEDURE, NO TIMELINE, NO APPEAL

Regulation 17 is silent on:

- filing procedure
- hearing mechanism
- evidentiary standards
- timelines
- interim relief
- appeal or review

This renders the “right” to dispute resolution **illusory**.

✗ AEC CONTEXT COMPLETELY IGNORED

Most disputes will involve:

- alleged excess export,
- billing disputes,
- technical compliance.

Without:

- **explicit AEC-based metrics, and**
- **independent technical determination,**

NEPRA becomes:

- prosecutor,
- expert witness,
- judge.

🏠 IPP VS PROSUMER — DISCRIMINATION

IPPs	Prosumers
Arbitration / expert panels	NEPRA only
Neutral forums	Regulator as judge
Detailed dispute clauses	Single vague sentence
International standards	Administrative fiat

This fails the **reasonable classification test** under Article 25.

✗ STRUCTURAL DEFECT

1. Violates natural justice
2. Eliminates neutral adjudication
3. Concentrates unchecked power
4. Discourages investment
5. Makes judicial review inevitable

✓ MANDATORY AEC-BASED REDRAFT

***Any dispute between a prosumer and a licensee shall first be referred to an independent dispute resolution forum designated by the Authority.

Disputes involving technical compliance shall be determined with reference to the Approved Export Capacity (AEC) and verified through independent technical assessment.

Decisions of the forum shall be appealable before the Authority, without prejudice to the constitutional jurisdiction of the High Courts.***

✦ CONSOLIDATED OBJECTION

“Regulation 17 of the Draft NEPRA (Prosumer) Regulations, 2025 is constitutionally invalid, as it vests exclusive adjudicatory authority in the regulator itself, violating principles of natural justice, impartial adjudication, and due process, ignores Approved Export Capacity (AEC) as the objective metric for dispute resolution, and discriminates against prosumers vis-à-vis IPPs, in breach of Articles 4, 10A, 18 and 25 of the Constitution and binding Supreme Court precedent.”

REGULATION 18 – Penalty for Failure, Refusal to Comply with, or Contravention

TEXT

“If any person fails or refuses to comply with, or contravenes any of the provisions of these regulations or any direction or order passed by the Authority under these regulations or knowingly or wilfully authorizes or permit such failure, refusal or contravention, he shall be punishable with a penalty as provided in the Act.”

✗ CORE OBJECTION — BLANKET PENAL LIABILITY WITHOUT ELEMENTS OR PROCESS

Administrative-Law Defect

This provision:

- criminalizes **any non-compliance**, however minor,
- applies equally to:
 - households,
 - SMEs,
 - DISCO officers,
- without defining:
 - **mens rea** (intent),
 - severity thresholds,
 - gradation of offences,
 - procedural safeguards.

This violates the principle that **penal provisions must be strictly construed** and narrowly tailored.

⚖️ □ CONSTITUTIONAL VIOLATIONS

Article 4 — Action Not in Accordance with Law

Penal exposure without defined elements is **arbitrary** and unlawful.

Article 10A — Fair Trial & Due Process

- No show-cause procedure prescribed
- No hearing mandated before penalty
- No distinction between technical lapse and wilful misconduct

Article 18 — Freedom of Business

The threat of penalties for minor or technical issues:

- chills lawful activity,
- discourages investment.

Article 25 — Equality Before Law

IPP violations:

- handled through contractual cure periods,
- notices,
- step-in mechanisms.

Prosumers:

- face immediate statutory penalties.

This is **hostile discrimination**.

❑ SUPREME COURT OF PAKISTAN

Supreme Court of Pakistan

Durrani Ceramics v. Government of Pakistan

PLD 2014 SC 741

→ Penal and fiscal measures must be **reasonable, proportionate, and non-confiscatory**.

Elahi Cotton Mills v. Federation of Pakistan

PLD 1997 SC 582

→ Laws imposing penalties must be **clear, certain, and predictable**; vague penal exposure is unconstitutional.

HIGH COURT AUTHORITY

Lahore High Court – WAPDA v. ICI Pakistan Ltd.

2018 CLD 1423

→ Regulatory penalties cannot be imposed without notice, hearing, and proportional assessment.

✗ NO DISTINCTION BETWEEN TECHNICAL NON-COMPLIANCE & WILFUL MISCONDUCT

Regulation 18:

- does not differentiate between:
 - meter reading error,
 - inverter communication fault,
 - deliberate energy theft.

This violates the **doctrine of proportionality**.

✗ AEC COMPLETELY IGNORED

Most alleged violations will relate to:

- export quantity,
- grid impact,
- billing disputes.

Without anchoring penalties to **Approved Export Capacity (AEC)**:

- compliance cannot be objectively assessed,
- penalties become discretionary.

🏠 IPP VS PROSUMER — DISCRIMINATORY PENAL REGIME

IPPs	Prosumers
Cure periods in PPAs	No cure period
Notice & default classification	No classification
Step-in before penalty	Direct penalty
Arbitration & expert determination	Administrative punishment

This disparity fails **reasonable classification** under Article 25.

✖ STRUCTURAL DEFECT

1. Criminalizes minor technical lapses
2. Enables coercive enforcement
3. Lacks mens rea requirement
4. Ignores AEC as compliance metric
5. Discourages participation in distributed generation

✓ MANDATORY AEC-BASED REDRAFT

***No penalty shall be imposed upon a prosumer unless:

- (a) a specific and material violation is established with reference to Approved Export Capacity (AEC) or other objective technical parameters;
- (b) a written show-cause notice is issued;
- (c) the prosumer is afforded an opportunity of hearing and a reasonable cure period; and
- (d) the penalty is proportionate to the severity and wilfulness of the contravention.

Minor technical or procedural non-compliance shall not attract penal consequences.***

✦ CONSOLIDATED OBJECTION

“Regulation 18 of the Draft NEPRA (Prosumer) Regulations, 2025 is constitutionally infirm and administratively arbitrary, as it imposes blanket penal liability without defining offences, mens rea, or procedural safeguards, ignores Approved Export Capacity (AEC) as the objective

compliance benchmark, and discriminates against prosumers vis-à-vis IPPs, in violation of Articles 4, 10A, 18 and 25 of the Constitution and binding Supreme Court precedent.”

REGULATION 19 – Power to Relax

TEXT

“The Authority may by general or special order, for reasons to be recorded in writing, after giving an opportunity of hearing to the persons likely to be affected, may relax any of the provisions of these regulations on its own motion or on an application made before it by an interested person.”

✗ CORE OBJECTION — UNFETTERED DISPENSATION FROM LAW

Administrative-Law Defect

This regulation authorizes the Authority to:

- **relax any provision** of the regulations,
- either **suo motu** or on application,
- without defining:
 - objective criteria,
 - scope of relaxation,
 - limits of discretion,
 - safeguards against discrimination.

A power to *relax the law itself* is the most extreme form of delegated discretion and is **constitutionally suspect unless strictly confined**.

⚖️ □ CONSTITUTIONAL VIOLATIONS

Article 4 — Action Not in Accordance with Law

Law must apply **equally and predictably**.
A regulator cannot suspend law selectively.

Article 10A — Due Process

- No structured procedure
- No right of representation by competing stakeholders
- No appellate mechanism

Article 18 — Freedom of Business

Selective relaxation distorts:

- market competition,
- investment certainty.
- regulatory neutrality.

Article 25 — Equality Before Law

Relaxation power creates:

- favored prosumers,
- disadvantaged prosumers,
- arbitrary classification without rational nexus.

□ SUPREME COURT OF PAKISTAN

Mustafa Impex v. Federation of Pakistan

PLD 2016 SC 808

Discretionary powers must be **structured, bounded, and exercised uniformly**; unfettered discretion is unconstitutional.

Al-Jehad Trust v. Federation of Pakistan

PLD 1996 SC 324

Public authorities must exercise power **transparently, impartially, and free from favoritism**.

Elahi Cotton Mills v. Federation of Pakistan

PLD 1997 SC 582

Selective exemptions or relaxations in economic regulation violate **equal protection and rule of law**.

HIGH COURT AUTHORITY

Lahore High Court – Nishat Mills Ltd. v. Federation of Pakistan

2018 CLD 521

→ Regulatory relaxation powers **cannot be exercised arbitrarily or selectively**, especially where economic rights are involved.

✗ NO OBJECTIVE CRITERIA FOR RELAXATION

Regulation 19 does **not specify**:

- when relaxation is justified,
- which provisions may be relaxed,
- whether relaxation applies:
 - individually,
 - sector-wide,
 - prospectively only.

This permits:

- favoritism,
- regulatory capture,
- unequal enforcement.

✗ AEC CONTEXT IGNORED

Relaxation power could be misused to:

- increase AEC for some,
- reduce AEC for others,
- waive export limits selectively.

This would:

- distort grid planning,
- undermine fairness,
- destroy predictability.

IPP VS PROSUMER — DISCRIMINATION

IPPs:

- receive exemptions only through:
 - Cabinet approval.
 - NEPRA determination.
 - Gazette notification,
 - uniform application.

Prosumers:

- subject to **case-by-case dispensation**.

This violates **Article 25's reasonable classification test**.

✗ STRUCTURAL DEFECT

1. Enables selective suspension of law
2. Encourages favoritism and lobbying
3. Defeats uniform application of regulations
4. Undermines investment certainty
5. Makes the regulatory regime unpredictable

✓ MANDATORY AEC-BASED REDRAFT

“The Authority may relax procedural requirements only, and only in exceptional circumstances of general application, provided that such relaxation:

- (a) does not affect tariffs, Approved Export Capacity (AEC), billing methodology, or agreement terms;**
- (b) is applied uniformly to a defined class of persons;**
- (c) is prospective in operation; and**
- (d) is notified publicly with reasons recorded.”**

CONSOLIDATED OBJECTION

“Regulation 19 of the Draft NEPRA (Prosumer) Regulations, 2025 is constitutionally infirm, as it empowers the Authority to relax substantive provisions of law without objective criteria, uniform application, or statutory limits, enabling arbitrary discrimination, undermining Approved Export Capacity (AEC) safeguards, and violating Articles 4, 10A, 18 and 25 of the Constitution as interpreted by binding Supreme Court precedent.”

REGULATION 20 – Power to Remove Difficulty

TEXT

“If any difficulty arises in giving effect to the provisions of these regulations, the Authority may, by general or specific order, make such provisions as may appear to be necessary for removing the difficulty.”

✗ CORE OBJECTION — BACKDOOR AMENDMENT POWER

Administrative-Law Defect

This clause:

- authorizes the Authority to “**make such provisions**”,
- **by order**, not regulation,
- **without consultation or Gazette notification**,
- with **no temporal or subject-matter limits**.

A “removal of difficulty” clause **cannot be used to amend, override, or re-write substantive law**. As drafted, it does exactly that.

⚖️ □ CONSTITUTIONAL VIOLATIONS

Article 4 — Action Not in Accordance with Law

Law-making must follow the **procedure prescribed by law** (Section 47, NEPRA Act). Orders cannot substitute regulations.

Article 10A — Due Process

No notice, hearing, or right of representation is prescribed before issuing orders that may affect civil and economic rights.

Article 18 — Freedom of Business

Open-ended orders can:

- change export limits.
- alter billing.
- impose new technical obligations, creating **unpredictable barriers** to lawful business.

Article 25 — Equality Before Law

Selective or case-specific “difficulty removal” creates **unequal application** among similarly placed prosumers.

☐ SUPREME COURT PRECEDENT

Supreme Court of Pakistan

Mustafa Impex v. Federation of Pakistan

PLD 2016 SC 808

→ Executive orders cannot amend or override subordinate legislation. delegated power must be **strictly confined**.

Elahi Cotton Mills v. Federation of Pakistan

PLD 1997 SC 582

→ Economic regulation must be **certain and predictable**; vague, open-ended powers are unconstitutional.

HIGH COURT AUTHORITY

Lahore High Court

WAPDA v. ICI Pakistan Ltd.

2018 CLD 1423

→ “Removal of difficulty” clauses are **transitional** and cannot be used to create new obligations or alter rights.

✗ NO TEMPORAL LIMIT — PERPETUAL POWER

Classic “removal of difficulty” clauses:

- are **time-bound** (e.g., 6–12 months),
- exist only to address **initial implementation gaps**.

This regulation:

- has **no sunset clause**,
- enables **permanent parallel law-making** by order.

✗ AEC AT RISK (SERIOUS POLICY FLAW)

Without limits, Regulation 20 can be used to:

- redefine **Approved Export Capacity (AEC)**,
- impose ad-hoc export caps,
- suspend export “temporarily” (but repeatedly),
- alter AEC enforcement **without amending the regulations**.

This **defeats the entire AEC-based framework** and undermines grid planning and investment certainty.

🏠 IPP VS PROSUMER — UNEQUAL TREATMENT

IPPs	Prosumers
PPAs amended only by formal process	Rights altered by order
Cabinet/NEPRA/Gazette required	No Gazette required
No “difficulty removal” override	Subject to ad-hoc orders

This disparity fails the **reasonable classification test** under Article 25.

✗ STRUCTURAL DEFECT

1. Enables amendment by executive order
2. Bypasses Section 47 NEPRA Act
3. Defeats public consultation
4. Undermines AEC certainty
5. Encourages selective enforcement

✓ **MANDATORY AEC-SAFE REDRAFT**

***The power to remove difficulty shall be exercised only for transitional implementation issues arising within twelve (12) months of commencement of these regulations.

No order under this regulation shall:

- (a) amend or override any substantive provision of these regulations;
- (b) affect tariffs, Approved Export Capacity (AEC), billing methodology, or existing agreements;
- or
- (c) operate retrospectively.

All such orders shall be published and reasoned.***

✦ **CONSOLIDATED COURT-READY OBJECTION**

“Regulation 20 of the Draft NEPRA (Prosumer) Regulations, 2025 is ultra vires and constitutionally infirm, as it confers an unlimited ‘removal of difficulty’ power enabling amendment of substantive rights by executive order, bypassing Section 47 of the NEPRA Act, undermining Approved Export Capacity (AEC) safeguards, and violating Articles 4, 10A, 18 and 25 of the Constitution, as consistently interpreted by the Supreme Court.”

REGULATION 21 – Savings and Repeal

Regulation 21(1)

TEXT

“The National Electric Power Regulatory Authority (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015 shall stand repealed upon coming into force of these regulations.”

✗ CORE OBJECTION — REPEAL WITHOUT LAWFUL COMMENCEMENT

Administrative-Law Defect

This clause presumes that the 2025 Regulations have **lawfully ‘come into force’**. However, as earlier established (Regulation 1), **draft regulations cannot be in force** absent **Gazette notification** under **Section 47, NEPRA Act, 1997**.

A repeal clause **cannot operate** unless commencement is lawful.

Constitutional Violations

- **Article 4** — action not in accordance with law
- **Article 10A** — deprivation of rights without due process

Supreme Court

Supreme Court of Pakistan

Mustafa Impex v. Federation of Pakistan — *PLD 2016 SC 808*

→ Subordinate legislation **has no legal effect** until duly notified: executive assumptions of enforcement are ultra vires.

! AEC CONTEXT

Repeal without lawful commencement enables DISCOs to:

- deny applications.
- block export approvals.
- impose new caps **without AEC being notified or approved.**

✓ MANDATORY REDRAFT

“The 2015 Regulations shall stand repealed **only upon lawful commencement** of these regulations through notification in the Official Gazette.”

Regulation 21(2)

TEXT

“Notwithstanding the repeal... nothing shall affect... licence issued and agreement executed under the repealed regulations... **except the billing shall be in accordance with regulation 14...**”

XXX FATAL OBJECTION — ILLEGAL RETROSPECTIVE OVERRIDE OF CONTRACTS

Administrative-Law Defect

This clause:

- **pretends to save agreements**, but
- **destroys their core economic terms** by forcing:
 - new billing.
 - new pricing.
 - new settlement.

This is **regulatory confiscation** disguised as ‘saving’.

Constitutional Violations

- **Article 24** — deprivation of property without compensation
- **Article 18** — destruction of lawful business investment
- **Article 4** — arbitrary interference with vested rights

Supreme Court (Directly on Point)

Durrani Ceramics v. Government of Pakistan — *PLD 2014 SC 741*

→ The State **cannot alter the economic substance of concluded contracts** by subordinate legislation.

Hub Power Company (HUBCO) Case — *PLD 2000 SC 841*

→ Energy agreements are **constitutionally protected commercial instruments**; sanctity of contract is inviolable.

IPP COMPARISON (CRITICAL)

- IPPs:
 - retain **PPA tariff for full 20–25 years**,
 - tariffs are **USD-indexed**,
 - no mid-term unilateral revision.
- Prosumers:
 - forced tariff downgrade,
 - forced billing rewrite,
 - **no compensation**.

This is **hostile discrimination** (Article 25).

! AEC IGNORED

Existing agreements were approved with:

- specific technical capacity,
- grid impact already assessed.

Forcing new billing **without re-approving AEC** violates:

- legitimate expectation,

- technical certainty.

✓ MANDATORY REDRAFT

“All agreements executed under the repealed regulations shall continue to be governed, **in their entirety**, by the terms therein until their natural expiry, including tariff, billing mechanism, netting method, and approved export limits (AEC).”

Regulation 21(2) – Proviso

TEXT

“...shall be billed in accordance with the national average power purchase price till the expiry of the term...”

✗ OBJECTION — CONFISCATORY PRICING WITHOUT CONSENT

Administrative-Law Defect

This proviso:

- **forces sale** at administratively determined price.
- without consent.
- without compensation.
- without renegotiation.

This is **regulatory taking**.

Supreme Court

Pakistan State Oil v. Federation of Pakistan — *PLD 2018 SC 355*

→ State-imposed pricing that appropriates private value **without compensation** is unconstitutional.

! AEC CONTEXT

Export energy within **approved AEC** was:

- lawfully permitted,
- economically justified under net metering.

Forcing NAEPP pricing **retroactively** nullifies AEC approvals.

✓ MANDATORY REDRAFT

“Pricing and billing of existing agreements shall remain unchanged for the full contractual term. Any new pricing shall apply **only to new applicants.**”

Regulation 21(3)

TEXT

“Upon expiry... any extension... shall be in accordance with these regulations...”

✗ OBJECTION — COERCIVE RENEGOTIATION

Administrative-Law Defect

This clause:

- compels acceptance of inferior future terms,
- exploits sunk investment,
- eliminates bargaining power.

Constitutional Violations

- **Article 18** — coercive restriction on business
- **Article 24** — devaluation of installed property

Supreme Court

Elahi Cotton Mills v. Federation of Pakistan — *PLD 1997 SC 582*

→ Economic regulation must not operate **coercively or confiscatorily**.

⚖️ IPP DOUBLE STANDARD

IPP renewals:

- negotiated.
- compensated.
- value-protected.

Prosumer renewals:

- forced downgrade.

! AEC IMPACT

AEC-approved infrastructure becomes **stranded** if renewal is coerced.

✓ MANDATORY REDRAFT

“Upon expiry, any extension shall be subject to **mutual consent**, and no prosumer shall be compelled to accept revised economic terms without renegotiation.”

✗ STRUCTURAL DEFECT OF REGULATION 21

1. Pretends to save rights while destroying substance
2. Retroactively confiscates economic value
3. Discriminates against prosumers vs IPPs
4. Ignores AEC approvals
5. Invites immediate constitutional challenge

CONSOLIDATED OBJECTION

“Regulation 21 of the Draft NEPRA (Prosumer) Regulations, 2025 is constitutionally fatal, as it repeals the 2015 Regulations without lawful commencement, retroactively overrides vested contractual rights through forced billing and pricing changes, confiscates economic value without compensation, ignores Approved Export Capacity (AEC), and discriminates against prosumers vis-à-vis IPPs, in violation of Articles 4, 18, 24 and 25 of the Constitution and binding Supreme Court precedent.”

Annexure-A

TECHNICAL NOTE

Solar Panel Watt Rating vs. Actual Electric Power Exported to the Grid

(Basis for Sanctioned / Approved Export Capacity – AEC)

1. Meaning of the Watt Rating Printed on Solar Panels

The wattage (W or kW) printed on photovoltaic (PV) solar panels represents the **maximum direct current (DC) power (P_{max})** of the module measured under **Standard Test Conditions (STC)**.

Standard Test Conditions (STC) are defined as:

- Solar irradiance: 1000 W/m²
- Cell temperature: 25°C
- Air mass: AM 1.5

STC is a **laboratory reference condition** intended solely for **standardized comparison of PV modules**.

It is **not representative of actual outdoor operating conditions**, particularly in real rooftop installations.

2. Why STC Power Cannot Be Achieved in Real Operation

In real-world installations, PV modules operate under conditions that are materially different from STC due to:

- Cell temperatures significantly higher than 25°C (often 45–70°C in warm climates)

- Variable solar irradiance due to:
 - sun angle.
 - haze.
 - clouds.
 - atmospheric conditions
- Losses due to:
 - dust and soiling.
 - module mismatch,
 - DC cabling losses,
 - connector losses
- Long-term degradation of modules (typically 0.5–0.8% per year)

As a result, the **STC-rated wattage** is rarely, if ever, achieved in field operation.

3. Actual Operating Power: NOCT / NMOT Concept

To represent realistic outdoor conditions, manufacturers define **NOCT (Nominal Operating Cell Temperature)** or **NMOT (Nominal Module Operating Temperature)**.

Under NOCT/NMOT-related conditions:

- Irradiance is typically around **800 W/m²**
- Cell temperature is approximately **45°C**
- Modules are mounted in open-air conditions

Many datasheets provide **P_{max} at NMOT**, which represents **realistic peak DC power** under field-like conditions.

Important Technical Clarification

- **NOCT itself is a temperature parameter**, not a power rating.
- **P_{max} at NMOT (or equivalent)** is the realistic power figure.
- Therefore, the technically precise statement is:

Actual operating power is closer to the module's P_{max} under NMOT/NOCT-related conditions than the STC nameplate value.

4. Why Panel Wattage Is NOT Grid Power

4.1 DC vs. AC Power

- PV modules generate **DC power**
- Electric grids operate on **AC power**
- Conversion occurs through **inverters**

4.2 System Losses Before Grid Injection

Between the PV module and the grid, power is reduced by:

- DC losses and mismatch
- Inverter conversion losses
- Thermal derating
- Protection and control limitations

4.3 Intermittency

Solar generation is:

- Zero at night
- Variable throughout the day
- Non-firm and non-dispatchable

Therefore:

PV module STC wattage does not represent firm electric power delivered to the grid.

5. The Grid Sees Only AC Power at the Point of Common Coupling (PCC)

From a power-system engineering perspective, the grid is affected only by:

- **AC active power (kW)**
- Measured at the **Point of Common Coupling (PCC)**

The maximum export to the grid is limited by:

- Inverter AC nameplate rating (kW or kVA)
- Export-limit settings in the inverter
- Protection settings
- Voltage and frequency constraints

Even if PV modules are oversized, the grid will never see power exceeding the inverter export limit.

6. Watt (kW) vs. Energy (kWh): A Critical Distinction

- kW = instantaneous power
- kWh = energy over time

PV systems are primarily **energy-producing devices**, not firm-capacity generators.

Comparing PV module STC kW directly with thermal or hydro generator capacity is **technically incorrect**.

7. Policy Error Resulting from Confusing STC Watts with Grid Power

When regulators or DISCOs treat PV module STC wattage as grid capacity:

- Grid stress is overestimated
- Transformer and feeder limits are misapplied
- Arbitrary restrictions are imposed
- Lawful applications are refused

This constitutes:

- **Error of technical fact**
- Leading to **error of law**
- Rendering administrative decisions **arbitrary and ultra vires**

8. Recommended Regulatory Approach: Sanctioned / Approved Export Capacity (AEC)

8.1 Definition

Approved Export Capacity (AEC):

The **maximum active AC power (kW)** permitted to be exported to the distribution system at the **Point of Common Coupling (PCC)**.

8.2 Key Principles

- AEC is **independent of PV module DC size**
- AEC may be **independent of inverter DC oversizing**
- Export is capped by:
 - inverter AC rating, and/or
 - configured export limit
- Compliance is verified at the PCC

9. Parity with IPPs: Capacity Testing Concept

In the case of Independent Power Producers (IPPs):

- Capacity is not accepted based on nameplate alone
- A **capacity test** is conducted to verify deliverable power

Equivalent for Prosumers

A **Prosumer Export Capacity Test** should be adopted:

- Conducted at commissioning
- Measures maximum AC export at PCC
- Confirms export does not exceed AEC

This provides:

- Technical accuracy
- Regulatory certainty
- Auditability
- Fair enforcement

10. International Practice Supporting AEC Concept

United States

- Terms used: *Maximum Export Capacity*, *Export Limit*
- IEEE 1547-2018 explicitly recognizes active power export limiting
- Utilities regulate **exportable AC power**, not module STC watts

Europe (UK, Germany, Netherlands, EU)

- Terms used:
 - *Agreed Export Capacity*

- *Permitted Feed-in Power*
- *Feed-in Limit*
- Export limits enforced via inverter controls
- PV DC size is not treated as grid capacity

Australia

- Distribution Network Service Providers impose explicit **export limits**
- Both fixed and dynamic export caps are used
- Grid planning is based on **export kW**

India

- Net metering and rooftop frameworks limit export relative to sanctioned/contracted load
- Utilities approve export limits, not panel STC capacity
- Concept of **sanctioned export capacity** exists

Bangladesh

- Net metering based on bi-directional metering
- Export measured and settled at utility meter
- Grid interaction determined by actual exported energy

Sri Lanka

- Net accounting and prosumer schemes regulate export to grid
- Settlement based on measured export at grid interface

Global Industry Practice

- Inverter manufacturers support export/feed-in limitation
- Export control is standard worldwide

11. Final Technical Conclusion

The wattage printed on photovoltaic modules represents a laboratory DC rating at Standard Test Conditions and is not equivalent to deliverable grid power. Actual operating power is closer to NMOT/NOCT-related performance and is further limited at the grid by inverter AC capacity, export controls, and system losses. Therefore, DISCOs and NEPRA should regulate interconnection, grid impact, and eligibility based solely on an Approved Export Capacity (AEC)—the maximum AC kW exported at the PCC—verified through a commissioning or capacity test, irrespective of the PV module DC nameplate or inverter oversizing, provided export remains capped at AEC.

Annexure-A

TECHNICAL NOTE

Solar Panel Watt Rating vs. Actual Electric Power Exported to the Grid

(Basis for Sanctioned / Approved Export Capacity – AEC)

1. Meaning of the Watt Rating Printed on Solar Panels

The wattage (W or kW) printed on photovoltaic (PV) solar panels represents the **maximum direct current (DC) power (P_{max})** of the module measured under **Standard Test Conditions (STC)**.

Standard Test Conditions (STC) are defined as:

- Solar irradiance: **1000 W/m²**
- Cell temperature: **25°C**
- Air mass: **AM 1.5**

STC is a **laboratory reference condition** intended solely for **standardized comparison of PV modules**.

It is **not representative of actual outdoor operating conditions**, particularly in real rooftop installations.

2. Why STC Power Cannot Be Achieved in Real Operation

In real-world installations, PV modules operate under conditions that are materially different from STC due to:

- Cell temperatures significantly higher than 25°C (often 45–70°C in warm climates)

- Variable solar irradiance due to:
 - sun angle,
 - haze,
 - clouds,
 - atmospheric conditions
- Losses due to:
 - dust and soiling,
 - module mismatch,
 - DC cabling losses,
 - connector losses
- Long-term degradation of modules (typically 0.5–0.8% per year)

As a result, the **STC-rated wattage** is rarely, if ever, achieved in field operation.

3. Actual Operating Power: NOCT / NMOT Concept

To represent realistic outdoor conditions, manufacturers define **NOCT (Nominal Operating Cell Temperature)** or **NMOT (Nominal Module Operating Temperature)**.

Under NOCT/NMOT-related conditions:

- Irradiance is typically around **800 W/m²**
- Cell temperature is approximately **45°C**
- Modules are mounted in open-air conditions

Many datasheets provide **P_{max} at NMOT**, which represents **realistic peak DC power** under field-like conditions.

Important Technical Clarification

- **NOCT itself is a temperature parameter**, not a power rating.
- **P_{max} at NMOT (or equivalent)** is the realistic power figure.
- Therefore, the technically precise statement is:

Actual operating power is closer to the module's P_{max} under NMOT/NOCT-related conditions than the STC nameplate value.

4. Why Panel Wattage Is NOT Grid Power

4.1 DC vs. AC Power

- PV modules generate **DC power**
- Electric grids operate on **AC power**
- Conversion occurs through **inverters**

4.2 System Losses Before Grid Injection

Between the PV module and the grid, power is reduced by:

- DC losses and mismatch
- Inverter conversion losses
- Thermal derating
- Protection and control limitations

4.3 Intermittency

Solar generation is:

- Zero at night
- Variable throughout the day
- Non-firm and non-dispatchable

Therefore:

PV module STC wattage does not represent firm electric power delivered to the grid.

5. The Grid Sees Only AC Power at the Point of Common Coupling (PCC)

From a power-system engineering perspective, the grid is affected only by:

- **AC active power (kW)**
- Measured at the **Point of Common Coupling (PCC)**

The maximum export to the grid is limited by:

- Inverter AC nameplate rating (kW or kVA)
- Export-limit settings in the inverter
- Protection settings
- Voltage and frequency constraints

Even if PV modules are oversized, the grid will never see power exceeding the inverter export limit.

6. Watt (kW) vs. Energy (kWh): A Critical Distinction

- kW = instantaneous power
- kWh = energy over time

PV systems are primarily **energy-producing devices**, not firm-capacity generators.

Comparing PV module STC kW directly with thermal or hydro generator capacity is **technically incorrect**.

7. Policy Error Resulting from Confusing STC Watts with Grid Power

When regulators or DISCOs treat PV module STC wattage as grid capacity:

- Grid stress is overestimated
- Transformer and feeder limits are misapplied
- Arbitrary restrictions are imposed
- Lawful applications are refused

This constitutes:

- **Error of technical fact**
- Leading to **error of law**
- Rendering administrative decisions **arbitrary and ultra vires**

8. Recommended Regulatory Approach: Sanctioned / Approved Export Capacity (AEC)

8.1 Definition

Approved Export Capacity (AEC):

The **maximum active AC power (kW)** permitted to be exported to the distribution system at the **Point of Common Coupling (PCC)**.

8.2 Key Principles

- AEC is **independent of PV module DC size**
- AEC may be **independent of inverter DC oversizing**
- Export is capped by:
 - inverter AC rating, and/or
 - configured export limit
- Compliance is verified at the PCC

9. Parity with IPPs: Capacity Testing Concept

In the case of Independent Power Producers (IPPs):

- Capacity is not accepted based on nameplate alone
- A **capacity test** is conducted to verify deliverable power

Equivalent for Prosumers

A **Prosumer Export Capacity Test** should be adopted:

- Conducted at commissioning
- Measures maximum AC export at PCC
- Confirms export does not exceed AEC

This provides:

- Technical accuracy
- Regulatory certainty
- Auditability
- Fair enforcement

10. International Practice Supporting AEC Concept

United States

- Terms used: *Maximum Export Capacity, Export Limit*
- IEEE 1547-2018 explicitly recognizes active power export limiting
- Utilities regulate **exportable AC power**, not module STC watts

Europe (UK, Germany, Netherlands, EU)

- Terms used:
 - *Agreed Export Capacity*

- *Permitted Feed-in Power*
- *Feed-in Limit*
- Export limits enforced via inverter controls
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Australia

- Distribution Network Service Providers impose explicit **export limits**
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- Grid planning is based on **export kW**

India

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- Utilities approve export limits, not panel STC capacity
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Bangladesh

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Sri Lanka

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Global Industry Practice

- Inverter manufacturers support export/feed-in limitation
- Export control is standard worldwide

11. Final Technical Conclusion

The wattage printed on photovoltaic modules represents a laboratory DC rating at Standard Test Conditions and is not equivalent to deliverable grid power. Actual operating power is closer to NMOT/NOCT-related performance and is further limited at the grid by inverter AC capacity, export controls, and system losses. Therefore, DISCOs and NEPRA should regulate interconnection, grid impact, and eligibility based solely on an Approved Export Capacity (AEC)—the maximum AC kW exported at the PCC—verified through a commissioning or capacity test, irrespective of the PV module DC nameplate or inverter oversizing, provided export remains capped at AEC.

Registrar

From: Javed Iqbal Malik <jimalik46@gmail.com>
Sent: Wednesday, December 24, 2025 1:25 PM
To: Chairman@nepra.org.pk
Cc: cad@nepra.org.pk; registrar@nepra.org.pk
Subject: New Net Metering and Billing Policy

Dear Sir,

It is being heard that NEPRA is ready to launch a new Net Billing Policy (end of Net Metering) with effect from 14 Jan 26. Reportedly, new policy will be applicable to both new and old licensees, except the purchase rate which will be Rs.27 for old users and Rs.11.5 for new users..

It is highly unjustified to first lure the citizens to install solar system, when people have installed these systems they are subjected to very harsh conditions. This unjustified policy is being launched, when entire world is encouraging the green energy and Pakistan is discouraging the same. It seems that this policy is being aiming at screwing the poor masses like fixed electricity/gas charges and petrol prices. You are requested to please review this policy and instead give relief to the people by lowering the

electricity tariffs.

Best regards

Col Javed Iqbal (Retd)

Forwarded please:

☒ For decision/action

☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECON)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Feisal Ali/AESL/PK <feisal@aesl.com.pk>
Sent: Wednesday, December 24, 2025 1:42 PM
To: registrar@nepra.org.pk
Subject: Prosumer Regulations 2025

Dear Sir

I am writing to bring to your attention the following section 21(2) in the draft regulations

21. Savings and Repeal.— (1) The National Electric Power Regulatory Authority (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015 shall stand repealed upon coming into force of these regulations.

(2) Notwithstanding the repeal effected by these regulations, nothing shall affect or be deemed to affect, the licence issued and agreement executed under the repealed regulations before commencement of these regulations except the billing shall be in accordance with regulation 14 commencing from the billing cycle subsequent to the month in which these regulations come into effect

I would like to point out that the wording " **except the billing shall be in accordance with regulation 14** " in Sec 21 (2)

This wording used is in direct conflict with the 7 year NEPRA licences where the standard wording used is

The Authority hereby grants Distributed Generation Licence* to XXXX, for photovoltaic solar based distributed generation facility, having consumer reference number XXXX, located at House # 00000000 under the National Electric Power Regulatory Authority (Alternative & Renewable Energy} Distributed Generation and Net Metering Regulations, 2015 (the "A&RE Regulations") for a period of seven (07) years. This Licence is valid up to Xday of **Mar** 2027.

All current NEPRA licences must be honored according to 2015 net metering guidelines.

Exception made in the draft rules in Sec 21(2) conflict with the wording used in the NEPRA licences. Please remove this contradiction to avoid future class litigation on this matter.

Feisal Ali

Forwarded please:

☒ For new action

☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ICBM)

For kind information, please:

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

221
1-1-28

NEPRA
Engineering Department
No. 160
Date 6-1-26

Registrar

From: Omar Hussain <omar.theappexpert@gmail.com>
Sent: Wednesday, December 24, 2025 1:42 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

“Misc.Charges” routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

- Protect any adverse or retrospective changes affecting existing net-metering consumers;
- Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
- Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Omar Hussain

BTPL Consumer
107, street 17, Phase – 6

Forwarded please:

<input checked="" type="checkbox"/> For no action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIG)
<input checked="" type="checkbox"/> ADP (M)	<input type="checkbox"/> DG (Fin)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> DG (LTI)
<input checked="" type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (BRCM)

For kind information please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Receiving Department
City No. 16-1
Date: 6-1-26

224
5-1-26

Registrar

From: Sherry <shaheryark59@yahoo.com>
Sent: Wednesday, December 24, 2025 12:50 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA Prosumer Regulations Dec 225

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Shaheryar Khan
DHAI, Phase-2
Islamabad.

Forwarded please:

☒ For next action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (MT)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (AICOM)

For kind information, please.

Chairman 2. M (Tech)
M (Law) 4. M (Dev)

Registrar

From: Saad Rashid <saadrashid1802@gmail.com>
Sent: Wednesday, December 24, 2025 12:58 PM
To: registrar@nepra.org.pk
Subject: Protest

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity.

Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Saad Rashid

Forwarded please:

<input checked="" type="checkbox"/> For rec. action	<input type="checkbox"/> For information
<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (P&I)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T.)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (Legal)

For kind information please:

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Legal Department
Date: 24/12/2025
Page: 1/1

BTPL Consumer Reference number

08 14615 2531500

MNA number 3175/25

Address 26 St 5 Sector A DHA/ Phase -2

Registrar

From: shahid ansar <shahid.ansar@gmail.com>
Sent: Wednesday, December 24, 2025 1:06 PM
To: cad@nepra.org.pk
Cc: registrar@nepra.org.pk; chairman@nepra.org.pk
Subject: Termination of Net Metering Policy

Dear sir,

This refers to news appearing in social media on replacement of Net Metering Policy by Net billing Policy. I am very disappointed and strongly protest on termination of Net Metering Policy. I have invested based on Net Metering Policy as electricity rates are getting expensive and unaffordable. These type of decisions suggest that previous policy was not well thought and cast doubt on seriousness on part of the regulator.

Foregoing above, I strongly request to continue Net Metering Policy for old consumers and renew contract in future as well,

Regards

Syed Shahid Ansar

H 9, St 5, SectorA, DHA-, Islamabad

0300-8567616.

Forwarded please:

☒ For note action

☐ For information

<input checked="" type="checkbox"/> DG (ic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (TCOM)

For kind information please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Atiq Mir <atiqmir08@gmail.com>
Sent: Wednesday, December 24, 2025 1:06 PM
To: registrar@nepra.org.pk
Subject: net metering

سولر انرجی نے بجلی سپلائی کمپنیوں کی اجارہ داری کافی حد تک ختم کر دی تھی عوام رفتہ رفتہ قدرے سکون میں آرہے تھے سستی بجلی کیلئے سولر انرجی کی پالیسی حکومت نے ہی بنائی تھی اگر آئی پی پیز کے دبائو یا مفاد میں سولر سے بجلی حاصل کرنے والے صارفین کی سہولت ختم یا مشکلات پیدا کی گئیں تو ملک میں جاری بجلی کا بحران شدت اختیار کر جائیگا اس لیے حکومت نیٹ میٹرنگ کے تحت کسی بھی منفی تبدیلی یا سہولت کے خاتمے کی غلطی نہ کرے۔
عتیق میر
چینرمین آل کراچی تاجر اتحاد

Forwarded please:

☒ For info. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Int.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information, please. -

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Khalid Mahmud Hassan <khalidmahmudhassan94@gmail.com>
Sent: Wednesday, December 24, 2025 2:36 PM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact.

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press in daily National Newspaper by advertisement dated 12th December 2025 and uploaded on NEPRA's website as well.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the purpose of net-metering.

As a consumer of electricity through (BTPL) i am already adversely affected by:-
Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments and "Misc.Charges" regularly added to electricity monthly bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which we legal consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA Authorities to:

- Reject any illogical , adverse and retrospective changes affecting net-metering consumers;
- Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
- Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[Khalid Mahmud Hassan]
L Consumer /
239-A, Circular Drive, Rafi Block, Phase viii, Bahria Town, Rawalpindi.

Forwarded please:

<input checked="" type="checkbox"/> For rec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (Inf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIR/IR)

For kind information please.

✓ Chairman 2. M (Tech)
1. M (Law) 4. M (Dev)

Registrar

From: Irum Tanzeel <irumtanzeel@gmail.com>
Sent: Saturday, December 27, 2025 12:07 PM
To: Chairman@nepra.org.pk; cad@nepra.org.pk; Registrar@nepra.org.pk
Subject: Request for Not implementing New Net Billing Policy

Dear Chairman NEPRA,

I'm writing to express concern about the new Net Billing Policy launching on Jan 14, 2026. The policy affects existing net metering users significantly. I request exemption for old users or reconsideration of purchase rates (Rs. 27 for old vs Rs. 11.5 for new users).

This change impacts fairness and solar investment viability. I urge NEPRA to reconsider and involve broader stakeholder participation.

Sincerely,
Irum Tanzeel.

✓
[Signature]

250
5-1-26

Forwarded please:
☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Lic)	<input type="checkbox"/> DG (Admin)
<input checked="" type="checkbox"/> SA (MAE)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Int)	<input type="checkbox"/> DG (Fin)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (EPRM)

For kind information please:
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

[Signature]

NEPRA
Receiving Department
Date: 16/12/2025
Date: 16/12/2025

Registrar

From: Saad Ali Khan <saadali90khan@gmail.com>
Sent: Sunday, December 28, 2025 4:28 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar (NEPRA) Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:
Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and
“Misc.Charges” routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.
In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:
Protect any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Aqil Khan

BTPL Consumer / Bahria Town Phase 8 Rawalpindi

Forwarded please:

<input checked="" type="checkbox"/> For pre. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ABC (Inf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> LA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Inv.)

For kind information please:

<input checked="" type="checkbox"/> Chairman	<input type="checkbox"/> 2. M (Tech)
<input type="checkbox"/> 3. M (Law)	<input type="checkbox"/> 4. M (Dev)

NEPRA
Licensing Department
Dy. Secy. (L.D.)
6-1-26

Registrar

From: Mansoor Aziz <mansoor53@gmail.com>
Sent: Sunday, December 28, 2025 7:06 PM
To: registrar@nepra.org.pk
Subject: Comments- Draft NEPA (Prosumer) Regulations, 2025

239
5.1.26

Respected Sir,
Being a consumer and a very concerned citizen, I want to share the following comments/ reservations on the Draft NEPA (Prosumer) Regulations, 2025, published for public opinion. My comments are in good faith to safeguard the interests of existing and future solar prosumers and also in line with the global approach to promote renewable energy. While appreciating NEPA's efforts to regulate and streamline distributed generation, I humbly submit that certain proposed changes may adversely affect consumers who have invested a handsome amount in solar systems under earlier policies. The major concerns are as under:

- 1. Reduction in Buyback / Export Rate and its Impact on Existing Prosumers.** The most affected people will be the middle class who have invested large amounts of their hard-earned savings in installing rooftop solar systems to reduce their growing expenditures on power bills. The proposed reduction in the rate at which exported solar units are purchased by DISCOs will make solar investments financially unviable, which were at one time being incentivised and encouraged by the government. This will erode consumer confidence in government policies. The middle-class people like me, have not invested in solar power generation for a term of 5 or 7 years. I invested for long term savings on power bills. Therefore, any changes to the Regulations should not affect the existing prosumers, notwithstanding the term of 5 or 7 years of their license.
- 2. Imposing new Fixed Charges.** Any proposal to impose new fixed charges, grid usage fees, or additional taxes on prosumers will further burden consumers who are already bearing high installation and maintenance costs. This defeats the objective of promoting clean and affordable energy.
- 3. Investment and Renewable Energy Policy Goals.** Pakistan is facing an energy crisis, high tariffs, and environmental challenges. Rooftop solar systems contribute positively by reducing load on the national grid, cutting transmission losses, lowering fossil fuel imports, and supporting climate commitments. Policies that discourage solar adoption will harm long-term national energy security.

In light of the above, I respectfully request NEPA to consider the following before finalizing the new policy:

1. Retaining the existing net metering policy for residential and small prosumers.
2. If change in policy is unavoidable, it should be applied to existing prosumers after 5 years from the date of effectiveness of the policy change and not after the remaining period of their existing license.
3. Including steps to encourage rooftop solar systems as a national priority.

Best regards
Mansoor Aziz
Rawalpindi



[Handwritten signature]

Forwarded please:

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<input checked="" type="checkbox"/> DG (Lic)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADP (Trd)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (I&M)

For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> 2. M (Tech)
<input checked="" type="checkbox"/> S. M (Law)	<input checked="" type="checkbox"/> 4. M (Dev)

[Handwritten signature]

NEPA
Director General
Copy No. 169
Date: 6/1/26

Registrar

From: Malik Azhar <malik780@hotmail.com>
Sent: Tuesday, December 23, 2025 9:09 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

To the Registrar (NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Dear Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;


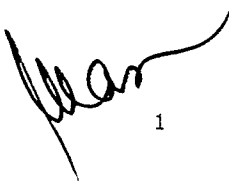
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Your Name

YOUR ADDRESS:
TESCO Customer ID: 8800431
House No: 615, Block P



1

Forwarded please:

<input checked="" type="checkbox"/> For rec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trd.)	<input type="checkbox"/> DG (Fin)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (Admin)

For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> M (Tech)
<input checked="" type="checkbox"/> M (Law)	<input type="checkbox"/> M (Dev)

282
5-1-26

NEPRA
Directorate
6-1-26

ROAD/STREET: 5
SECTOR/MOHALLA: Phase 2, M.A. Johar Town
CITY: Lahore
PROVINCE: Punjab

Registrar

From: Usman Khan <usmankhan002011@gmail.com>
Sent: Tuesday, December 23, 2025 9:11 PM
To: registrar@nepra.org.pk
Subject: Net metering

The government will not survive if they try to change the rates of net metering and put pressure on people who have solar panels. We are not responsible for the owners of IPPs. We are also not responsible for pressure on grid.

Forwarded please:

☒ For pvt. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADP (Int.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T.)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Plan

NEPRA
Licensing Department
Sany No. 171
Date 6-1-26

Registrar

From: Ikram Rasheed <ikram@mcgroup.com.pk>
Sent: Tuesday, December 23, 2025 9:29 PM
To: Chairman@nepra.org.pk
Cc: registrar@nepra.org.pk
Subject: Protest against implementing new policy of net billing wef 14th January 2026

Sir,

I have come to know about the new policy and I am deeply concerned that how can this government be so ruthless to finish solar net metering. People have put their savings in instalation of solar as they were previously encouraged to go on solar as government had itself given incentives. But now this is a U turn which will affect millions of households.

Nations who have progressed continue governing policies so common person should not effected due to change in leadership.

I am recording my protest to the above action.

Qudsia niazi .

House 01 Street 02 sector F DHA 2 near gate 4 Islamabad

email: ikram@mcgroup.com.pk

Mobile: 03331512260

Forwarded please:

☒ For new action ☐ For information

<input checked="" type="checkbox"/> DG (LIC)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> M&A	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

RECEIVED
Planning Department
Date: 17/2/26
Time: 6-1-26

Registrar

From: SNK khan <sajid1st1st@gmail.com>
Sent: Tuesday, December 23, 2025 9:36 PM
To: registrar@nepra.org.pk
Subject: Net metering vs Gross Metering

It is understood that the govt is considering the change in policy mainly to address the falling demand of grid power for which it is paying the IPPs ...despite that IPPs are not required to generate full capacity power.

The proposed policy will accelerate the shift to hybrid /gridless energy and thus further aggravate the situation.

Following is strongly proposed:-

- a. NO change in net metering policy or rates(export/import).
- b. IPPs be required to generate FULL capacity electricity.
- c. Power thus generated be provided to MANUFACTURING Sector at CHEAPER rates than Commercial. Best would be to provide it on the CHEAPEST rates ie even lower than the Residential rates. This will encourage purchase of electricity for manufacturing which will enhance exports and lead to progress.

The govt will not have to FORCE purchase of elec units by Residential users to compensate for lack of demand. Public will feel good when IPPs will be paid for something they are PRODUCING rather than just getting money WITHOUT even producing elec.

No further renewals of contracts with IPPs should be allowed.

Regards

Forwarded please:

<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Ec.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Inf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (CIC/SM)

For kind information, please.

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

NEPRA
Planning Department
Copy No. 173
Date: 6-1-26

Registrar

From: Irfan, Muhammad <irfanm@cdmsmith.com>
Sent: Tuesday, December 23, 2025 9:53 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Object any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Muhammad Irfan

Consumer ID 1140309006
Gulberg Residencia, F block, Islamabad

Forwarded please:

<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trl)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (CHRM)

For kind information, please.

Chairman 2. M (Tech)
M (Law) 4. M (Dev)

NEPRA
174
6-1-26

Registrar

From: Asad Shaukat <asadshaukat24@gmail.com>
Sent: Tuesday, December 23, 2025 9:55 PM
To: registrar@nepra.org.pk
Cc: Asad Shaukat
Subject: Dear Sir,

Not accepted IESCo new solar power generator policy.

We as Bahria Town has already been suffering huge loss after investing in solar system due to BTPL units deduction and now with your new polices what we have received is further disappointing for the us being consumers.

As solor power generator which we installed to support the short fall of electricity in the country is becoming our wrong decision and a burden for us now and further with your negative policies.

Please review your tariff rates and provide favour to consumers, instead later you may regret on your decision when consumers will find some alternates to curb on their electricity billing.

Kind Regards
Capt. Asad Shaukat

"Committed to manage maritime safety"

Forwarded please:

☒ For m.a. action ☐ For information

<input checked="" type="checkbox"/> PG (Lic.)	<input type="checkbox"/> DG (AdminHR)
<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (IT)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information please,

Chairman 2. M (Tech)
M (Law) 4. M (Dev)

Registrar

From: khurram humaiyun <khumaiyun440@yahoo.com>
Sent: Tuesday, December 23, 2025 10:28 PM
To: registrar@nepra.org.pk
Subject: Subject:Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Dear Sir,

I hereby submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's official website.

The proposed amendments to the net-metering/prosumer framework will cause serious financial loss to existing solar consumers who installed solar systems under a legally approved regime, with legitimate expectations of affordable and predictable electricity costs. Any reduction in export value or adverse modification in settlement mechanisms would deprive consumers of the benefits of self-generated electricity and defeat the very purpose of net-metering.

As a consumer of BTPL, I am already adversely affected by arbitrary deduction and reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and so-called "Miscellaneous Charges" routinely added to BTPL electricity bills, which do not appear in the bills of any other electricity distribution company in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies—matters for which consumers bear no responsibility whatsoever.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

1. Reject any adverse or retrospective changes affecting existing net-metering consumers;
2. Ensure that prosumers are not penalized to cover DISCO/utility losses, inefficiencies, or electricity theft; and
3. Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL as BTPL, already in connivance with IESCO, is deducting approximately 30% of my total monthly solar generation without any lawful or transparent justification, vaguely labeling it as "closure adjustment." This practice is arbitrary, non-transparent, and amounts to an unlawful deprivation of consumers' legitimately generated energy. With the introduction of the proposed new policy, maintaining a solar system will effectively become futile. This constitutes daylight economic exploitation of consumers under the patronage of the state.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Lt Col (R) Khurram Humaiyun
BTPL Consumer
House No. 602L, Street 17
Overseas Sector-3, Phase-8

Forwarded please:

<input checked="" type="checkbox"/> For info action	<input type="checkbox"/> For information
<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (C/ECM)

For kind information please.

Chairman 2. M (Tech)
V. M (Law) 4. M (Dev)

Registrar

From: Raheel Khan <raheelpasha@hotmail.com>
Sent: Tuesday, December 23, 2025 7:07 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft Regulations.

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Dear Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Raheel Khan

Forwarded please:

☒ For one action ☐ For information

<input checked="" type="checkbox"/> DG (Pic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIG)
<input type="checkbox"/> ADG (T&I)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

BTPL Consumer
H.464
Road-C
Sector-F
Safari Home
Bahria Town Phase 8
Rawalpindi

Registrar

From: rizwan nasir <rizwannasir96@yahoo.com>
Sent: Tuesday, December 23, 2025 7:04 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025

To,
The Registrar NEPRA Islamabad

Sir,

I Muhammad Rizwan Nasir a consumer and solar on grid system user submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

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In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Object any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Muhammad Rizwan Nasir

Forwarded please:

☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Fin.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: MTufail Malik <muhammادتufailmalik@gmail.com>
Sent: Tuesday, December 23, 2025 6:22 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar

NEPRA
Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published on 12 December 2025.

The proposed changes to the net-metering/prosumer framework will cause financial harm to existing solar consumers who invested under a lawful and approved regime with a legitimate expectation of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms defeats the core objective of net-metering.

As a BTPL consumer, I am already facing arbitrary reduction of export units, imposition of illegal tariff-related charges, and recurring "Misc. Charges" not levied by other DISCOs. The proposed regulations will further aggravate this situation by unfairly shifting DISCO inefficiencies, losses, and theft onto prosumers.

Such measures are unjust, discriminatory, and contrary to renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

- Reject any adverse or retrospective changes affecting existing net-metering consumers;
- Ensure prosumers are not penalized to offset DISCO losses and theft; and
- Protect solar consumers from arbitrary deductions and non-transparent billing practices, particularly by BTPL.

These objections may kindly be placed on record and considered before finalization of the regulations.

Yours sincerely,

Brig Muhammad Tufail Retd
House 68F Sector F DHA-1 (managed by Bahria; BTPL)

Forwarded please:

<input checked="" type="checkbox"/> For reg. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/BR)
<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (P.T.C.W)

For kind information, please.

Chairman	2 M (Tech)
3. M (Law)	4. M (Dev)

Registrar

From: Tipu Sultan <stipu0689@gmail.com>
Sent: Tuesday, December 23, 2025 5:44 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

I am a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Shagufta Qureshi

Address / house 868 street 42 Rafi extension defense villas bahria town phase 8 rawalpindi

NEPRA
Secretary General
Chairman
6-1-26

1

1

Forwarded please:
☒ For processing ☐ For information

<input checked="" type="checkbox"/> DG (I.C.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Ext.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/PEM)

For kind information please:
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Hamid Rafique <hamidrafique_786@hotmail.com>
Sent: Tuesday, December 23, 2025 8:50 PM
To: Registrar@nepra.org.pk
Subject: Complaint

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

284
5.1.28

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

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Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Dr Hamid Rafique
H.no 73. St 2 . Sector A . Bahria Town phase 8. RWP

Sent from Outlook for Android

Forwarded please:

<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/PCM)

For kind information please,
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

1

NEPRA
Licensing Department
May No. 193
Date: 6-1-26

Registrar

From: ANWAR KHAN <anwarkhan1964@gmail.com>
Sent: Tuesday, December 23, 2025 8:39 PM
To: registrar@nepra.org.pk

I strongly reject new policy of net billing.

28
5.1.26

Forwarded please:

<input checked="" type="checkbox"/> For rec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (L.E.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/RCM)

For kind information please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

[Handwritten signature]

NEPRA
For Department
197
2025/12/26

Registrar

From: JAy J <jady9002@gmail.com>
Sent: Tuesday, December 23, 2025 8:31 PM
To: registrar@nepra.org.pk
Subject: BTPL consumer Adverse Impact

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL-Bahria Town Pvt Ltd.) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

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Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Junaid Akhtar

0315-5208890

St 55 Ali block phase 8 Bahria Town Rawalpindi.

Forwarded please:

☒ For reg. action ☐ For information

<input checked="" type="checkbox"/> DG (Gc.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CHRM)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Raja Ehtisham <rajaehtisham40@gmail.com>
Sent: Tuesday, December 23, 2025 8:28 PM
To: registrar@nepra.org.pk
Subject: Objections to NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

Proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Ehitisham akhtar

[BTPL Consumer / Meter No 1171555 Kucikpay Ref No 01060221221777700
[1299 E St 47 Ali Block Bahria town Rwp / Phase 8 –

Forwarded please:

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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (L.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (RCM)

For kind information, please.

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

Registrar

From: Agha Jamal Asghar <aghamahal@yahoo.com>
Sent: Tuesday, December 23, 2025 8:20 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

To,

The Registrar
(NEPRA) Islamabad

Dear Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA’s website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

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I respectfully request NEPRA to:

- Reject any adverse or retrospective changes affecting existing net-metering consumers;
- Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
- Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Jamal Asghar Pathan

BTPL Consumer : 01060221000800400

Forwarded please:

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<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (TUCM)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

House # 1777, Street # 68, Ali Block, Bahria Town Phase –8 Rawalpindi

Registrar

From: muhammad irfanali Ali <mirfanali13@gmail.com>
Sent: Tuesday, December 23, 2025 8:05 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of Bahria Town Private Limited (BTPL) I am already adversely affected by: Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan. In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible. Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:
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Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

With very best regards
Muhammad Irfan Ali

Forwarded please?

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (ICM)

For kind information, please.

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

NEPRA
Received
188
6-1-26

Registrar

From: Raza Munem <munemgrace@gmail.com>
Sent: Tuesday, December 23, 2025 7:57 PM
To: registrar@nepra.org.pk
Subject: Highly Objectionable Policy on Net Metering-A Day Time Dacoity

290
5.1.26

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA’s website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.
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These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[Name]

[BTPL Consumer /
DHA Phase -2 Islamabad

187
6-1-26

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Forwarded please:

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<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CBGM)

For kind information, please.

Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

Registrar

From: Akhtar Malik <nawabi4@gmail.com>
Sent: Tuesday, December 23, 2025 7:56 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA(Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

To the Registrar (NEPRA)
Islamabad

Dear Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Malik Akhtar
House No: 3
STREET No:13
SECTOR: G
DHA2, Islamabad

Forwarded please:

<input checked="" type="checkbox"/> For notification	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
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<input checked="" type="checkbox"/> M.A.	<input checked="" type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (e/BCM)

For kind information, please.

Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

Registrar

From: Sahir Hijaz khan <sahirhijazkhan@icloud.com>
Sent: Tuesday, December 23, 2025 7:42 PM
To: registrar@nepra.org.pk
Subject: Net Metering/Solar Energy Consumers

Request have some mercy on this nation and let present to system to continue for benefit of poor people. Government is already selling excess units at a very high rates and busy in minting good amount in terms of taxes, so it is advised to drop this new idea of changing Net metering with AMI meters and introducing new tariff rates for solar consumers. This will only support IPPs owners.

293
5.1.26



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Forwarded please:

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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CICM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

[Handwritten signature]

NEPRA
Reg. Department
185
6-1-26

Registrar

From: Pervez Sultan <pervez.sultan@gmail.com>
Sent: Tuesday, December 23, 2025 7:29 PM
To: registrar@nepra.org.pk
Subject: Objections on Draft NEPRA REGULATIONS-2025

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Dear Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
PERVEZ SULTAN KHAN

[BTPL Consumer /
House-3, Lane-5, Sector E, DHA Phase 2, Islamabad

Forwarded please:

<input checked="" type="checkbox"/> For production	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (L&C)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Muhammad Latif <itslark@gmail.com>
Sent: Wednesday, December 24, 2025 6:43 AM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar (NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Muhammad Latif

H. No. 253, Street 14-A, Overseas Sector 2, Phase 8, Bahria Town, Rawalpindi

Forwarded please:

☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/R)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> PLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTBCM)

For kind information please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Idrees Hamdani <idreeshamdani@gmail.com>
Sent: Wednesday, December 24, 2025 4:54 AM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
S. Idrees H. Hamdani

[BTPL Consumer /

House No. 1598, street 12, overseas sector 5 phase 8 Bharia town Rawalpindi

Forwarded please:

☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Inc.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Tst.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EUCM)

For kind information please.

Chairman 2. M (Tech)
2. M (Law) 4. M (Dev)

Registrar

From: Waseem Akram <waseem.akram820@gmail.com>
Sent: Wednesday, December 24, 2025 12:18 AM
To: registrar@nepra.org.pk
Subject: Comments on NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (PROSUMER) REGULATIONS, 2025

AOA. Respected sir, with reference to NEPRA's advertisement dated 15.12.2025, I am recording my comments on the above titled regulations. Sir, it is stated that although these regulations have been aimed at maintaining stability of the national grid, however, rights of the already in-place license holders are being curbed. As per Regulation 21 of the said regulations, the terms of the already signed agreements are being changed unilaterally by the licensing authority without consent of the prosumer. It is unethical and illegal to change mutually agreed upon terms and conditions. The existing Net Metering Regulations - 2015 under which existing licenses have been signed, the KWH are traded off between the DISCO and consumer (prosumer), however, the new policy aims at introducing net billing at the rate of National Average Power Purchase Price. This is sheer injustice with the existing license holders. The existing license holders must be regulated under the Net Metering Regulations - 2015 till expiry of their contracts and the policy of net metering (exchange of units) must be continued fulfilling the contractual requirements. Another aspect of this proposal directly deals with shaking investors' confidence, if the government cannot fulfill the contractual obligations and is backing out of its own proposal, how can one expect large scale investments in Pakistan.

Regards
Waseem Akram

Forwarded please:

<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (TTL)	<input type="checkbox"/> DG (fin.)
<input checked="" type="checkbox"/> KLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information please.

☒ Chairman ☒ 2. M (Tech)
☒ 3. M (Law) ☒ 4. M (Dev)

221
1.1.26

1822AA
Received Department
Date 18.1
File No. 6-1-26

Registrar

From: Shahid Khan <shahidmk1@gmail.com>
Sent: Tuesday, December 23, 2025 11:57 PM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

Proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Shahid Mehmood Khan

[BTPL Consumer /
House# 36-J, Lane# J, Phase#8, Bahria Town, Rawalpindi

Forwarded please:

<input checked="" type="checkbox"/> For decision	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (L.C.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Art.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIBCM)

For kind information please.

✓ Chairman ✓ M (Tech)
✓ M (Law) 4. M (Dev)

Registrar

From: amir toor <amir.toor2003@gmail.com>
Sent: Tuesday, December 23, 2025 10:58 PM
To: registrar@nepra.org.pk
Subject: Objections on Draft NEPRA

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Amir Saeed

BTPL Consumer /
Address / Phase –

Forwarded please:

<input checked="" type="checkbox"/> For reg. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trd.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/REG)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Zahid Ali Khan <pharmacistzahid@icloud.com>
Sent: Tuesday, December 23, 2025 10:49 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

Proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:
Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Khalida khan
139, st 147 D-12/4 Islamabad

Sent from my iPhone

Forwarded please:

<input checked="" type="checkbox"/> For p.c. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Inf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ICBM)

For kind information, please:

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

[Handwritten signature]

Registrar

From: Aqib Khan <aaqibkhan@live.com>
Sent: Tuesday, December 23, 2025 10:55 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I commit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Aqib Ali Khan

Forwarded please:

☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Ec.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUCM)

For kind information please,

Chairman M (Tech)
M (Law) 4. M (Dev)

Canal town Nasir Bagh road Peshawar
20261330796502

Registrar

From: M Sammad <saeeda.safma@gmail.com>
Sent: Tuesday, December 23, 2025 7:23 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

To the Registrar (NEPRA)
Islamabad

Dear Sir,
I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:
Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and
"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.
In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.
Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:
Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Saeeda Raheel

YOUR ADDRESS:

1

Forwarded please:

<input checked="" type="checkbox"/> For rec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIG)
<input type="checkbox"/> ADG (Trd.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (TRM)

For kind information please:

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> M (Tech)
<input checked="" type="checkbox"/> M (Law)	<input type="checkbox"/> M (Dev)

198
6-1-26

House 464 Road c sector f safari homes bahria town phase 8

CITY

Rawalpindi

PROVINCE

Punjab

Email,saeeda.safma@gmail.com

Registrar

From: Yasmeen Raees <yasraees21@gmail.com>
Sent: Saturday, December 27, 2025 9:11 PM
To: cad@nepra.org.pk; registrar@nepra.org.pk; chairman@nepra.org.pk
Subject: Net billing not accepted.

It is requested kindly not to apply net billing mechanism it is completely unjustifiable.

4115
12/27/2025
10:11 AM

2

249
5-1-26

[Signature]

Forwarded please:

<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Ac.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Int.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (e-Proc)

For kind information please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

[Signature]

NEPRA
Licensing Department
Date: 2-1-26
Q.No: 6-1-26

Registrar

From: Jahanzeb Khan <jahanzeb.khan36@gmail.com>
Sent: Wednesday, December 24, 2025 9:46 AM
To: Registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 -- Additional Adverse Impact on BTPL Consumers

The
Registrar
-Dec-2025
NEPRA
Islamabad

24

SUBJECT: OBJECTIONS TO DRAFT NEPRA (PROSUMER) REGULATIONS, 2025 -- ADDITIONAL ADVERSE IMPACT ON BTPL CONSUMERS

Dear Sir;

I submit my formal objections to the Draft NEPRA (Prosumer) Regulations, 2025, published via press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious and immediate financial loss to consumers like me who installed solar systems during 2022 under an approved legal regime and with legitimate expectations of affordable electricity and regulatory certainty. Any reduction in the export value of self-generated electricity, adverse changes to settlement mechanisms, or retrospective application of new charges will deprive me of the economic benefits that justified their investment and will defeat the very purpose of net-metering.

BREACH OF LEGITIMATE EXPECTATIONS AND REGULATORY CERTAINTY

Many households and businesses invested in rooftop solar based on the existing legal and regulatory framework. Retrospective or punitive changes would amount to a breach of legitimate expectations, undermine the rule of law, and damage investor and consumer confidence in Pakistan's energy policy.

CONFLICT WITH NATIONAL AND INTERNATIONAL SUSTAINABILITY COMMITMENTS

These proposed changes are inconsistent with Pakistan's stated climate and sustainability commitments, including obligations under the Paris Agreement and the United Nations Sustainable Development Goals, particularly those relating to affordable, reliable, and clean energy and climate action. Discouraging distributed renewable generation at this stage would set back national efforts to reduce emissions, improve energy security, and meet internationally-pledged targets.

Forwarded please:

<input checked="" type="checkbox"/> For review	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (H/T)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADP (IT)	<input type="checkbox"/> DG (H/T)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> DG (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (Tech)

For kind information, please:

Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

DISPROPORTIONATE BURDEN ON PROSUMERS AND BTPL CONSUMERS

As a consumer of BTPL, I am already adversely affected by:

- Arbitrary deduction/reduction of solar export units;
- Non-transparent charges imposed under the guise of tariff adjustments;
- “Misc. Charges” routinely added to electricity bills.

In this context, the draft regulations would further aggravate the financial exploitation of solar consumers by effectively using prosumers to offset KE/DISCO inefficiencies, losses, theft, and non-recovery for which consumers are not responsible. This approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, consumer protection, and regulatory fairness.

WIDER ECONOMIC AND SYSTEM IMPACTS

Discouraging rooftop solar will also harm broader public interests: it will slow job creation in the local solar industry, increase reliance on expensive centralized generation, raise overall system costs for all consumers, and reduce the resilience and flexibility that distributed generation provides to the grid. It will also undermine efforts to diversify Pakistan’s energy mix and to lower peak demand pressures on the transmission and distribution network.

TRANSPARENCY, ACCOUNTABILITY AND PROCEDURAL FAIRNESS

The draft regulations, as currently framed, lack adequate safeguards to prevent misuse of prosumer revenues to cover unrelated DISCO liabilities. There is insufficient transparency around billing adjustments, export accounting, and the methodology for any new charges. There is also no clear, independent mechanism for auditing DISCO practices or for timely redress of consumer grievances.

RELIEF SOUGHT :

Considering the foregoing, I respectfully request NEPRA to:

1. Reject any adverse or retrospective changes that would reduce the export value, alter settlement mechanisms, or otherwise penalize existing net-metering consumers who invested under the prior legal regime.
2. Grandfather existing prosumers under the rules and tariffs in place at the time of their interconnection, with any future changes applied only prospectively and after adequate notice and consultation.
3. Ensure prosumers are not used to subsidize DISCO losses, theft, or non-recovery. Any cost-recovery measures must be transparent, justified, and borne in a manner consistent with law and regulatory precedent.
4. Mandate transparent billing and independent audits of export accounting, meter readings, and any “miscellaneous” charges, with clear penalties for unlawful deductions or manipulations.

5. Require a public, evidence-based impact assessment and a meaningful stakeholder consultation process (including consumer groups, prosumer associations, industry representatives, and independent experts) before finalizing any changes.
6. Provide a clear grievance redressal and compensation mechanism for consumers who have suffered arbitrary deductions, illegal charges, or non-transparent billing practices, particularly BTPL consumers.
7. Align the final regulations with Pakistan's climate and energy commitments, ensuring they support, rather than hinder, the national transition to sustainable, distributed generation.

These measures will protect consumers, preserve regulatory credibility, support Pakistan's sustainability goals, and maintain a stable environment for continued private investment in clean energy.

I request that these objections be placed on record and given full and fair consideration before any finalization of the regulations. I am prepared to provide further evidence, billing examples, or testimony to support these objections if required.

Also please acknowledge the receipt of this email.

Kind regards;

Engr. JAHAN ZEB KHAN (Net Metering Consumer of Karachi Electric)

Cell: 0301-2249583

M-10,

KDA Overseas Bungalows,

Block 16-A,

Gulistan-e-Johar,

Karachi.

Registrar

From: Waqas Ahmed <waqasahmed@parco.com.pk>
Sent: Wednesday, December 24, 2025 10:09 AM
To: cad@nepra.org.pk
Cc: registrar@nepra.org.pk; chairman@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers

The Registrar
NEPRA
Islamabad

Sir,

Forwarded please:

☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADP (T&I)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> M&A	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E&C)

For kind information please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

I submit my formal objections to the Draft NEPRA (Prosumer) Regulations, 2025, published via press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious and immediate financial loss to consumers who installed solar systems under an approved legal regime and with legitimate expectations of affordable electricity and regulatory certainty. Any reduction in the export value of self-generated electricity, adverse changes to settlement mechanisms, or retrospective application of new charges will deprive prosumers of the economic benefits that justified their investment and will defeat the very purpose of net-metering.

Breach of legitimate expectations and regulatory certainty

Many households and businesses invested in rooftop solar based on the existing legal and regulatory framework. Retrospective or punitive changes would amount to a breach of legitimate expectations, undermine the rule of law, and damage investor and consumer confidence in Pakistan's energy policy.

Conflict with national and international sustainability commitments

These proposed changes are inconsistent with Pakistan's stated climate and sustainability commitments, including obligations under the Paris Agreement and the United Nations Sustainable Development Goals, particularly those relating to affordable, reliable, and clean energy and climate action. Discouraging distributed renewable generation at this stage would set back national efforts to reduce emissions, improve energy security, and meet internationally-pledged targets.

Disproportionate burden on prosumers and BTPL consumers

As a consumer of BTPL, I am already adversely affected by:

- Arbitrary deduction/reduction of solar export units;
- Non-transparent charges imposed under the guise of tariff adjustments;
- "Misc. Charges" routinely added to electricity bills that do not appear in other DISCOs' billing.

In this context, the draft regulations would further aggravate the financial exploitation of solar consumers by effectively using prosumers to offset DISCO inefficiencies, losses, theft, and non-recovery for which

consumers are not responsible. This approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, consumer protection, and regulatory fairness.

Wider economic and system impacts

Discouraging rooftop solar will also harm broader public interests: it will slow job creation in the local solar industry, increase reliance on expensive centralized generation, raise overall system costs for all consumers, and reduce the resilience and flexibility that distributed generation provides to the grid. It will also undermine efforts to diversify Pakistan's energy mix and to lower peak demand pressures on the transmission and distribution network.

Transparency, accountability and procedural fairness

The draft regulations, as currently framed, lack adequate safeguards to prevent misuse of prosumer revenues to cover unrelated DISCO liabilities. There is insufficient transparency around billing adjustments, export accounting, and the methodology for any new charges. There is also no clear, independent mechanism for auditing DISCO practices or for timely redress of consumer grievances.

Relief sought

In light of the foregoing, I respectfully request NEPRA to:

1. Reject any adverse or retrospective changes that would reduce the export value, alter settlement mechanisms, or otherwise penalize existing net-metering consumers who invested under the prior legal regime.
2. Grandfather existing prosumers under the rules and tariffs in place at the time of their interconnection, with any future changes applied only prospectively and after adequate notice and consultation.
3. Ensure prosumers are not used to subsidize DISCO losses, theft, or non-recovery. Any cost-recovery measures must be transparent, justified, and borne in a manner consistent with law and regulatory precedent.
4. Mandate transparent billing and independent audits of export accounting, meter readings, and any "miscellaneous" charges, with clear penalties for unlawful deductions or manipulations.
5. Require a public, evidence-based impact assessment and a meaningful stakeholder consultation process (including consumer groups, prosumer associations, industry representatives, and independent experts) before finalizing any changes.
6. Provide a clear grievance redressal and compensation mechanism for consumers who have suffered arbitrary deductions, illegal charges, or non-transparent billing practices, particularly BTPL consumers.
7. Align the final regulations with Pakistan's climate and energy commitments, ensuring they support, rather than hinder, the national transition to sustainable, distributed generation.

These measures will protect consumers, preserve regulatory credibility, support Pakistan's sustainability goals, and maintain a stable environment for continued private investment in clean energy.

I request that these objections be placed on record and given full and fair consideration before any finalization of the regulations. I am prepared to provide further evidence, billing examples, or testimony to support these objections if required.

Yours sincerely,
Waqas Ahmed
BTPL Consumer
Karachi

Sent from Outlook for Android

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Registrar

From: umair naqvi <umair_naqvi@yahoo.com>
Sent: Wednesday, December 24, 2025 10:10 AM
To: Registrar@nepra.org.pk
Cc: Chairman@nepra.org.pk; cad@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Adverse Impact on Existing and Future Prosumers, Including K-Electric Consumers

Sir,

I respectfully submit my objections to the Draft National Electric Power Regulatory Authority (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's official website for public consultation.

1. Violation of Legitimate Expectation and Regulatory Certainty

Consumers installed rooftop solar systems under the NEPRA Net Metering Regulations, 2015, relying on a clear and lawful regulatory framework. The proposed shift from net metering to net billing, particularly the reduction of export compensation to the national average energy purchase price, fundamentally alters the economic assumptions under which these investments were made.

This undermines regulatory certainty and violates the principle of legitimate expectation.

2. Retrospective and Adverse Financial Impact

Although the draft regulations suggest continuation of existing agreements until expiry, the proposed billing methodology materially reduces the value of self-generated electricity. Such changes amount to an indirect retrospective financial impact on existing consumers who invested in good faith.

3. Adverse Impact on K-Electric Consumers

As a K-Electric consumer, I am already subject to frequent tariff adjustments and cost pass-through mechanisms approved by NEPRA. The proposed Prosumer Regulations will impose an additional and disproportionate financial burden on solar consumers without addressing underlying issues such as system losses, theft, and recovery inefficiencies.

This approach unfairly penalizes compliant consumers while providing no structural solution to sector inefficiencies.

Forwarded please:

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<input checked="" type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (AIG)
<input type="checkbox"/> ADG (IT)	<input type="checkbox"/> DG (fin)
<input checked="" type="checkbox"/> LA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (fin)

For kind information please:
Chairman 2. M (Tech)
M (Law) 4. M (Dev)

NEPRA
Hearing Department
Dated: 24/12/25
24/12/25

4. Unjust Transfer of Distribution System Inefficiencies

The draft regulations effectively shift the burden of inefficiencies within the power distribution system onto prosumers. Consumers who invest in distributed generation should not be required to subsidize losses, theft, or non-recovery through reduced compensation for clean energy exports.

5. Conflict with Renewable Energy and Energy Security Objectives

Distributed renewable generation has played a critical role in reducing grid stress, fuel imports, and consumer costs. The proposed regulations weaken the economic viability of rooftop solar and send a negative signal to households and businesses considering investment in clean energy.

6. Requests and Relief Sought

I respectfully request NEPRA to:

1. Avoid any adverse or retrospective economic impact on existing net-metering consumers
2. Fully protect existing agreements for their entire term, both contractually and economically
3. Ensure that prosumers are not used to offset distribution losses and inefficiencies
4. Maintain a fair and economically viable export compensation mechanism
5. Reassess the proposed net-billing framework in light of consumer protection and renewable energy objectives

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Name: Umair Naqvi

Consumer: K-Electric

Consumer No: 400003555807

Contact: 03005338393

Registrar

From: Abdullah Hassan Syed <syedabdullahhassan70@gmail.com>
Sent: Wednesday, December 24, 2025 10:17 AM
To: cad@nepra.org.pk; registrar@nepra.org.pk; chairman@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on KE Consumers

The Registrar
NEPRA
Islamabad

Respected Sir,

Forwarded please:

<input checked="" type="checkbox"/> For rec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Ec.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Inf.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CBOM)

For kind information please:
✓ Chairman 2. M (Tech)
✓ M (Law) 4. M (Dev)

I submit my formal objections to the Draft NEPRA (Prosumer) Regulations, 2025, published via press advertisement dated 12 December 2025 and uploaded on NEPRA’s website.

The proposed changes to the net-metering/prosumer framework will cause serious and immediate financial loss to consumers who installed solar systems under an approved legal regime and with legitimate expectations of affordable electricity and regulatory certainty. Any reduction in the export value of self-generated electricity, adverse changes to settlement mechanisms, or retrospective application of new charges will deprive prosumers of the economic benefits that justified their investment and will defeat the very purpose of net-metering.

Breach of legitimate expectations and regulatory certainty

Many households and businesses invested in rooftop solar based on the existing legal and regulatory framework. Retrospective or punitive changes would amount to a breach of legitimate expectations, undermine the rule of law, and damage investor and consumer confidence in Pakistan’s energy policy.

Conflict with national and international sustainability commitments

These proposed changes are inconsistent with Pakistan’s stated climate and sustainability commitments, including obligations under the Paris Agreement and the United Nations Sustainable Development Goals, particularly those relating to affordable, reliable, and clean energy and climate action. Discouraging distributed renewable generation at this stage would set back national efforts to reduce emissions, improve energy security, and meet internationally-pledged targets.

Disproportionate burden on prosumers and KE consumers

- As a consumer of KE, I am already adversely affected by:
- Arbitrary deduction/reduction of solar export units;
 - Non-transparent charges imposed under tariff adjustments;
 - “Misc. Charges” routinely added to electricity bills.

In this context, the draft regulations would further aggravate the financial exploitation of solar consumers by effectively using prosumers to offset DISCO inefficiencies, losses, theft, and non-recovery for which

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consumers are not responsible. This approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, consumer protection, and regulatory fairness.

Wider economic and system impacts

Discouraging rooftop solar will also harm broader public interests: it will slow job creation in the local solar industry, increase reliance on expensive centralized generation, raise overall system costs for all consumers, and reduce the resilience and flexibility that distributed generation provides to the grid. It will also undermine efforts to diversify Pakistan's energy mix and to lower peak demand pressures on the transmission and distribution network.

Transparency, accountability and procedural fairness

The draft regulations, as currently framed, lack adequate safeguards to prevent misuse of prosumer revenues to cover unrelated DISCO liabilities. There is insufficient transparency around billing adjustments, export accounting, and the methodology for any new charges. There is also no clear, independent mechanism for auditing DISCO practices or for timely redress of consumer grievances.

Relief sought

In light of the foregoing, I respectfully request NEPRA to:

1. Reject any adverse or retrospective changes that would reduce the export value, alter settlement mechanisms, or otherwise penalize existing net-metering consumers who invested under the prior legal regime.
2. Grandfather existing prosumers under the rules and tariffs in place at the time of their interconnection, with any future changes applied only prospectively and after adequate notice and consultation.
3. Ensure prosumers are not used to subsidize DISCO losses, theft, or non-recovery. Any cost-recovery measures must be transparent, justified, and borne in a manner consistent with law and regulatory precedent.
4. Mandate transparent billing and independent audits of export accounting, meter readings, and any "miscellaneous" charges, with clear penalties for unlawful deductions or manipulations.
5. Require a public, evidence-based impact assessment and a meaningful stakeholder consultation process (including consumer groups, prosumer associations, industry representatives, and independent experts) before finalizing any changes.
6. Provide a clear grievance redressal and compensation mechanism for consumers who have suffered arbitrary deductions, forcibly imposed charges.
7. Align the final regulations with Pakistan's climate and energy commitments, ensuring they support, rather than hinder, the national transition to sustainable, distributed generation.

These measures will protect consumers, preserve regulatory credibility, support Pakistan's sustainability goals, and maintain a stable environment for continued private investment in clean energy.

I humbly request you that these objections be placed on record and given full and fair consideration before any finalization of the regulations.

Yours sincerely,

Registrar

From: Kamil Masood <kamilmasood@icloud.com>
Sent: Saturday, December 27, 2025 10:06 AM
To: registrar@nepra.org.pk
Subject: Net meetring solar user of bahria town

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town
lahoreConsumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of LESCO I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BAHRIA TOWN

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Kamil masood

House 25 takbeer block sector B bahria town lahore

0321-4190007

Forwarded please:

<input checked="" type="checkbox"/> For production	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Legal)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

210
601-26

Registrar

From: Kamil Masood <kamilmasood@icloud.com>
Sent: Saturday, December 27, 2025 10:06 AM
To: registrar@nepra.org.pk
Subject: Net meeting solar user of bahria town

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town
lahoreConsumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of LESCO I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BAHRIA TOWN

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Kamil masood

House 25 takbeer block sector B bahria town lahore

0321-4190007

Forwarded please:

☒ For decision ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/HR/M)

For kind information please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

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Library No. 209
6-1-26

Registrar

From: Ashfaq Hassan <ashfaqhassan100@gmail.com>
Sent: Saturday, December 27, 2025 9:29 AM
To: registrar@nepra.org.pk
Subject: Objectiond to Draft NEPRA Regulation, 2035-Additional Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by: Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan. In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible. Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:
Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These kindly be placed on record and duly considered before finalization of the regulations.

Profound Regards
Brig Ashfaq Hassan (R)
Sitara-e-Imtiaz Military
Mobile:00923336997210

Forwarded please:

<input checked="" type="checkbox"/> For no action	<input type="checkbox"/> For information
<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> ADG (PPL)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> KLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (HR/CM)

For kind information please.

Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

NEPRA
Director General
Chairman
208
6-1-26

Registrar

From: Shahbaz Maqsood <shahbaz.maqsood@gmail.com>
Sent: Saturday, December 27, 2025 1:57 AM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Consumers

The Registrar
(NEPRA)
Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Protect any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Shahbaz Maqsood

H.No 7, Lane 11, Sector C, DHA-2, Islamabad.

0345-5227455

Forwarded please:

<input checked="" type="checkbox"/> For neg. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Ec.)	<input type="checkbox"/> DG (Admin/HR)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (L.F)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (RCM)

For kind information please,

Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Zahid Iqbal <zahidiqbalmbl@gmail.com>
Sent: Wednesday, December 24, 2025 10:36 AM
To: cad@nepra.org.pk
Cc: registrar@nepra.org.pk; chairman@nepra.org.pk
Subject: Solar Net Metering Policy

Dear Sir,

I strongly oppose the proposed net metering policy which will adversely affect the present solar users. They have made the investment to ease their electricity cost n support the country in managing energy crisis.

Thks

Zahid Iqbal
0336 5466181

Forwarded please:

☒ For pre-action ☐ For information

<input checked="" type="checkbox"/> DG (Vic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (HR/CM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

5-26028

[Handwritten signature]

NEPRA
Chairman's Department
File No. 20.6
6-1-2026

Registrar

From: Waqas Asif <waqas.asif@gmail.com>
Sent: Wednesday, December 24, 2025 9:39 AM
To: registrar@nepra.org.pk
Cc: cad@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Serious Adverse Impact on IESCO Consumers

Sir,

I am writing to formally submit my objections to the **Draft NEPRA (Prosumer) Regulations, 2025**, as published on 12 December 2025.

As an IESCO consumer who invested in solar energy under the existing legal framework, the proposed regulations represent a breach of "legitimate expectation." The changes threaten the financial viability of my investment and undermine the transition toward clean energy in Pakistan.

Specifically, I object to the draft based on the following concerns:

- Financial Injustice:** The proposed reduction in the export value of units (shifting from a 1:1 unit offset to a lower monetary credit) will significantly extend the payback period of solar systems, making them unaffordable for the middle class.
- Retrospective Application:** Any changes applied to existing net-metering license holders are legally and morally questionable. Consumers made heavy investments based on the regulatory certainty provided by the 2015 Regulations.
- Subsidizing Inefficiency:** IESCO consumers should not be penalized to cover the systemic inefficiencies, line losses, and electricity theft within the distribution network. Prosumers are part of the solution to the energy crisis, yet these regulations treat them as a financial burden.
- Impact on Renewable Goals:** At a time when the government is pushing for a "Green Pakistan," these regulations create a massive deterrent for future solar adoption, ensuring a continued reliance on expensive, imported fossil fuels.

I respectfully request NEPRA to:

- Reject any retrospective changes** for existing IESCO net-metering consumers; their terms should be "grandfathered" for the duration of their licenses.
- Maintain the 1:1 netting mechanism** to ensure consumers receive the full benefit of the electricity they contribute to the national grid.
- Ensure transparency** in how "fixed charges" or "grid sharing charges" are calculated, preventing IESCO from imposing arbitrary costs on solar users.

These objections are submitted for the record, and I request that they be given due consideration before any regulations are finalized.

Yours sincerely,




Forwarded please:
☒ For next action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Economic)

For kind information please.
Chairman 2 M (Tech)
S.M (Law) 4 M (Dev)

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NEPRA
Licensing Department
Dy. No. 205
Date: 6-1-26

Waqas Asif

IESCO Consumer Number: 114083424

Address: Service Road East, B-1 Block, B-17, Islamabad

Date: December 24, 2025

Registrar

From: iftikhar ahmad <hmc.hrmlw@gmail.com>
Sent: Wednesday, December 24, 2025 9:28 AM
To: Registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

Proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
IFTIKHAR AHMAD

House No.843, Street No.36,
Block C-1, B-17, Islamabad
03325026614

Forwarded please:

☒ For P.C. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> DG (M&E)	<input type="checkbox"/> DG (CAD)
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<input checked="" type="checkbox"/> GLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Legal)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Consumer ID 15142133084400

Iftikhar Ahmad
Head (HR)
HRM DEPTT.,
HEAVY MECHANICAL COMPLEX (PVT) LTD.,
TAXILA.
Tel.(+92-51)9270562 & 9314181
Fax (+92-51)9270560, 9314203
Cell No.0332-5026614

Registrar

From: Raiwind Markaz <5391786@gmail.com>
Sent: Wednesday, December 24, 2025 12:24 PM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA’s website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

“Misc.Charges” routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

- Reject any adverse or retrospective changes affecting existing net-metering consumers;
- Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
- Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Zahid Paracha

[BTPL Consumer /
House No 17 St. 1 Bahria Hills View Phase 7 Bahria Town
Rawalpindi

Forwarded please:

<input checked="" type="checkbox"/> For next action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Elec.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> SLA	<input type="checkbox"/> DG (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information, please:
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

233
5-1-28

Registrar

From: Asif Bashir <asif.bashir@gmail.com>
Sent: Wednesday, December 24, 2025 12:17 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad
Subject:

Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Dear Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units (30 % per month), Illegal charges imposed under the guise of tariff adjustments (Rs. 8 per unit), and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Asif Bashir Malik

Forwarded please:

<input checked="" type="checkbox"/> For rec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (L&E)	<input type="checkbox"/> DG (Advisors)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LIT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (LIT)

For kind information please:

✓ Chairman 2. M (Tech)
✓ M (Law) 4. M (Dev)

0321 5167803

BTPL Consumer Number 221000511000-7173

House No 426, Street No 24, Bahria Town Phase 7, Islamabad

Registrar

From: Mairaj Warsi <mairaj.warsi@gmail.com>
Sent: Wednesday, December 24, 2025 11:45 AM
To: registrar@nepra.org.pk; cad@nepra.org.pk; chairman@nepra.pk
Cc: Mairaj Warsi
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025

The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025

Sir,

I respectfully submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated **12 December 2025** and uploaded on NEPRA's official website.

The proposed amendments to the existing net-metering/prosumer framework will result in substantial financial loss to solar consumers who installed their systems under a duly approved legal regime, with a legitimate expectation of affordable, reliable, and predictable electricity costs. Any reduction in export value or adverse alteration in settlement mechanisms will deprive consumers of the benefit of cheaper self-generated electricity and undermine the very objective of the net-metering policy.

The proposed draft regulations will further aggravate the financial exploitation of solar consumers by effectively using prosumers as a means to offset inefficiencies, technical losses, electricity theft, and non-recovery of dues by distribution companies—matters for which consumers bear no responsibility.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, consumer protection, and Pakistan's long-term energy sustainability goals.

In view of the above, I respectfully request NEPRA to:

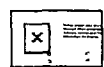
1. Reject any adverse, unilateral, or retrospective changes affecting existing net-metering consumers;
2. Ensure that prosumers are not penalized to compensate for DISCO/utility losses or electricity theft; and
3. Protect solar consumers from arbitrary deductions,

These objections may kindly be placed on record and given due consideration before finalization of the proposed regulations.

Yours sincerely,

Mairaj Warsi

IESCO Consumer # 1141934760



Virus-free. www.avast.com

Forwarded please:

<input checked="" type="checkbox"/> For production	<input type="checkbox"/> For information
<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AEC)
<input type="checkbox"/> ADG (Trd.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (HRGM)

For kind information please:

Chairman L. M (Tech)
L. M (Law) 4. M (Dev)

Registrar

From: Noman Mehmood <noumanmajestic@gmail.com>
Sent: Wednesday, December 24, 2025 11:18 AM
To: chairman@nepra.org.pk
Cc: cad@nepra.org.pk; Registrar@nepra.org.pk
Subject: Serious Concern & Objection to Proposed Net Billing Policy – Request Protection for Existing Net Metering Consumers

Respected Chairman NEPR,

I am writing to express my serious concern and strong objection regarding the proposed Net Billing Policy, which effectively ends Net Metering and is planned to be implemented from 14 January 2026. I am an existing net-metering consumer who invested a substantial amount of personal savings in installing a solar system under the prevailing NEPRA Net Metering policy. This investment was made in good faith, based on long-term policy assurances and financial viability. At a time when Pakistan was facing severe electricity shortages, rising fuel costs, and load-shedding, we solar consumers supported the national grid by producing clean electricity at our own expense. We reduced burden on the grid, saved foreign exchange, and contributed to energy stability during difficult times.

The proposed policy change will:

- Destroy the financial viability of our investments
- Undermine investor confidence in government policies
- Penalize responsible citizens who adopted renewable energy
- Cause financial losses to households who planned based on existing rules

Changing the policy retrospectively for existing net-metering users is unjust and unfair. We have already invested, signed agreements, and designed our systems according to the current framework. I humbly request NEPRA to:

- Exempt existing net-metering consumers from the new Net Billing policy
- Protect already installed systems under the original net-metering terms
- Apply any new policy only to future consumers, not retrospectively

We helped the country during bad times. It is deeply disappointing that now we are being asked to sacrifice our lawful investments. I sincerely urge NEPRA to reconsider this policy and safeguard the rights of existing net-metering consumers in the interest of fairness, trust, and sustainable energy development.

Yours sincerely,
Nouman Majestic
Concerned Net Metering Consumer
Pakistan

Forwarded please:

<input checked="" type="checkbox"/> For info. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIG)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (HR/CM)

For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> M (Tech)
<input checked="" type="checkbox"/> M (Law)	<input type="checkbox"/> M (Dev)

Registrar

From: nafees ul Haq <nafeesulhaq19@gmail.com>
Sent: Sunday, December 28, 2025 11:17 PM
To: registrar@nepra.org.pk
Subject: Observations on Draft NEPRA (Prosumer) Regulations 2025 -- Adverse impact on IESCO Consumers

Dear Sir,

1. It is submitted that I am an electricity consumer of IESCO. I am residing in DHA Phase 2 , Islamabad.
2. With reference to the latest proposal floated vide Draft NEPRA (Prosumer) Regulations--2025, as published dated 12 Dec 2025, I hereby submit my observations as stated below :
 - a. The proposed changes to the cost effect applicable in the existing Net - Metering System for consumers who have installed Solar Power Grids, will be a great setback and Financial Loss to these consumers. The Solar Power Grids have been installed by these consumers in response to the National policy of promoting and enhancing Renewable Energy sources to the national grid , under a legally approved framework.
 - b. The proposed reduction in the rates of electricity exported to the National Grid by the above- mentioned consumers (who have installed solar systems) will cause a great financial loss to these electricity consumers.
 - c. Please consider the fact that due to reasons best known to them, the DISCOS are NOT being able to overcome their problems of Line Losses, non recovery issues, low efficiency of certain line staff and other related technical issues. It would NOT be fair to penalize the electricity consumers (who have installed solar grids) for the reasons stated above.
3. It is therefore requested that :
 - a. Proposals of Reduction of existing rates on electricity exported to the National Grid, through Net Metering System should NOT be agreed upon by NEPRA and "Existing Rates" be continued, to safeguard the interests of loyal electricity consumers.
 - b. That the Existing Rates be continued to provide protection to the earst -while exporters of electric power to the National Grid, and save these consumers from great financial loss for no fault of theirs.
 - c. All DISCOS be directed to take concrete steps to improve their procedures for greater efficiency of their systems.

Sincerely Yours
IESCO Consumer
M Nafees Ul haq
0323 8556061

To : The Registrar NEPRA, NEPRA Tower, Ataturk Avenue(East),G-5/1, Islamabad.

Forwarded please:

<input checked="" type="checkbox"/> For p.c. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (H.C.)	<input type="checkbox"/> DG (Admin)
<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input checked="" type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information please.

1. Chairman
2. M (Tech)
3. M (Law)
4. M (Dev)

Registrar

From: Dir Avn Nayyar Afzaal <diraviation2@shaheenfoundation.com>
Sent: Wednesday, December 24, 2025 9:14 AM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer, I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Nayyar Afzaal

Forwarded please:

<input checked="" type="checkbox"/> For reg. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trd.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CICOM)

For kind information please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

267
5-1-26

[Handwritten signature]

226
6-1-26

Registrar

From: Waheed Riaz <waheedriaz@gmail.com>
Sent: Wednesday, December 24, 2025 7:42 AM
To: registrar@nepra.org.pk
Subject: Comments on Proposed net metering policy

Sir

The proposed net metering policy appears regressive, as it discourages household and small-scale renewable energy adoption. By reducing buyback rates and adding restrictive conditions, the policy undermines consumer confidence and weakens incentives for clean energy investment. Instead of promoting energy independence and sustainability, it risks increasing reliance on expensive grid power and slowing the transition to renewables.

It is therefore requested that the same may not be applied and the grid losses may be handled with concrete measures

Regards

Waheedriaz

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Forwarded please:

☒ For rec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trd.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIBCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

[Handwritten signature]

268
5-1-28

Registrar

From: farooq memon <farmemon61@gmail.com>
Sent: Sunday, December 28, 2025 3:33 PM
To: registrar@nepra.org.pk
Subject: Fwd: Legal Objection and Constitutional Notice Against the Draft NEPRA (Consumer) Regulations, 2025 – Violation of Fundamental Rights and Doctrine of Legitimate Expectation

----- Forwarded message -----

From: farooq memon <farmemon61@gmail.com>
Date: Sun, 28 Dec 2025, 15:28
Subject: Legal Objection and Constitutional Notice Against the Draft NEPRA (Consumer) Regulations, 2025 – Violation of Fundamental Rights and Doctrine of Legitimate Expectation
To: <registrar@nepra.org.pk>
Cc: <farmemon61@hotmail.com>

Respected Sir,

This legal representation is submitted to formally place on record serious constitutional, legal, and equitable objections to the Draft NEPRA (Consumer) Regulations, 2025, which, if enforced in their present form, shall result in grave injustice, unlawful deprivation of property, and violation of fundamental rights guaranteed under the Constitution of the Islamic Republic of Pakistan.

It is respectfully stated that thousands of citizens, including myself, invested substantial personal capital into solar photovoltaic systems solely on the basis of express governmental policies, NEPRA regulations, and public assurances promoting Net Metering as a long-term, stable, and protected energy framework. These investments were made in good faith, in reliance upon regulatory continuity, and under the legitimate expectation that the State would not arbitrarily reverse or dilute its commitments.

Any retrospective modification to export valuation, settlement methodology, or economic viability of existing net-metering arrangements amounts to a direct breach of the Doctrine of Legitimate Expectation, a principle repeatedly upheld by the superior judiciary of Pakistan.

Such action further violates:

Article 4 – by denying citizens lawful treatment in accordance with due process;

Article 18 – by unlawfully restricting lawful economic activity and investment;

Article 24 – by effectively depriving citizens of the economic value of their lawfully acquired assets without compensation or legal justification; and

Article 25 – by subjecting a specific class of consumers (Consumers) to discriminatory, hostile, and unequal treatment.

The proposed regulatory framework seeks to shift the burden of systemic inefficiencies, line losses, electricity theft, and governance failures of DISCOs onto compliant and law-abiding citizens. Such a transfer of institutional failure onto private individuals is legally indefensible and constitutionally impermissible.

As a resident of Bahria Town Lahore, I further place on record that solar consumers are already facing arbitrary export reductions, unexplained deductions, and vague “miscellaneous charges” that lack transparency, justification, or legal foundation. Instead of correcting these violations, the proposed regulations appear to legitimize and institutionalize them.

It is respectfully submitted that public policy cannot be rewritten at the expense of citizens who acted in accordance with the law. A State that invites investment and later penalizes compliance undermines not only investor confidence but also the rule of law itself. Accordingly, you are hereby called upon to:

- 1) Withdraw or substantially revise the Draft NEPRA(Consumer)Regulations, 2025 insofar as they affect the consumers;
- 2) Ensure that no retrospective financial, technical, or operational burdens are imposed on current Consumers
- 3) Prevent the transfer of DISCO inefficiencies, losses, or governance failures onto compliant consumers;
- 4) Ensure transparency, uniformity, and constitutional conformity in billing and adjustment mechanisms nationwide.

Failure to address these concerns shall leave affected citizens with no option but to seek appropriate constitutional and legal remedies before the competent forums, including the Honourable High Courts, to safeguard their fundamental rights and lawful investments worth Billions of rupees collectively

Forwarded please:

☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADC (Trf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (HR/CM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

This notice is issued in good faith and in the interest of justice, constitutional governance, and the long-term stability of Pakistan's renewable energy framework.

Yours faithfully

Muhammad Farooq Memon
Resident, Bahria Town Lahore

Registrar

From: farooq memon <farmemon61@gmail.com>
Sent: Sunday, December 28, 2025 3:28 PM
To: registrar@nepra.org.pk
Cc: farmemon61@hotmail.com
Subject: Legal Objection and Constitutional Notice Against the Draft NEPRA (Consumer) Regulations, 2025 – Violation of Fundamental Rights and Doctrine of Legitimate

✓

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Forwarded please:

☒ For action ☐ For information

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<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (CHROM)

For kind information please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

22-3
6-1-2.6

Registrar

From: Muaaz Sheikh <muaaz.sheikh56@gmail.com>
Sent: Sunday, December 28, 2025 2:02 PM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town lahoreConsumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of Bahria town Lahore I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Sajjad Ahmad

Address: House # 19 overseas B extension Bahria Town Lahore

Forwarded please:

☒ For reg. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> AISC (Trf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIC/CR)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Dr. Junaid Habib Khan <drjunikh@gmail.com>
Sent: Sunday, December 28, 2025 12:34 PM
To: Chairman@nepra.org.pk
Cc: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

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I respectfully request NEPRA to:

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Junaid Habib Khan

Forwarded please:

<input checked="" type="checkbox"/> For pre-action	<input type="checkbox"/> For information
<input type="checkbox"/> DG (Ec.)	<input type="checkbox"/> DG (Admin)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LIT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (HQM)

For kind information, please.

Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: shahrukhjaved31@outlook.com
Sent: Sunday, December 28, 2025 12:03 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town Lahore Consumers

To,

The Registrar
(NEPRA)
Islamabad
Subject:

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of Solar, I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

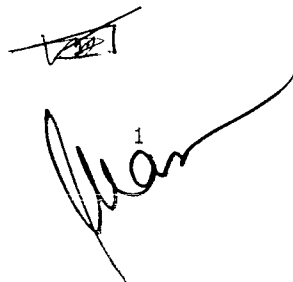
Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,



Forwarded please:

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<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Tid)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information please,

✓ Chairman ✓ M (Tech)
✓ M (Law) 4. M (Dev)

220
6-1-26

Shahrukh Javed
03219119841

Talha Block, Bahria Town, Lahore.

Registrar

From: Atiq Mir <atiqmir08@gmail.com>
Sent: Wednesday, December 24, 2025 1:17 PM
To: registrar@nepra.org.pk
Subject: Objection

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Atiq Mir

[BTPL Consumer /
124/2 Main khayaban e behria / Phase -5 Karachi

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For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Syed Amir <syedaftabamir@hotmail.com>
Sent: Saturday, December 27, 2025 10:00 PM
To: registrar@nepra.org.pk
Subject: Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town Lahore Consumers

The Registrar
(NEPRA)
Islamabad

Respected Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Syed Aftab Amir
House # 371 Safari Villas
Bahria Town Lahore

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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (Mgmt)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Momen Raza <kiransweety221@gmail.com>
Sent: Saturday, December 27, 2025 9:24 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town lahoreConsumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

A consumer of solar energy I am already adversely affected by:

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"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

RAZA MEHMOOD

Consumer: 100000005034

Address: 466 A Gulmohar Block Sector C Bahria Town Lahore

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<input type="checkbox"/> ADP (H.F.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SI A	<input type="checkbox"/> DG (H.F.)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (H.F.)

For kind information, please.

✓ Chairman 2. M (Tech)
✓ M (Law) 4. M (Dev)

NEPRA
Circulars Department
217
6-1-26

248
5-1-26

Chairman NEPRA

From: Nazeer Anjum <nazeer.anjum61@gmail.com>
Sent: Friday, January 2, 2026 6:46 AM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse

Forwarded please:
☒ For reg. action ☒ Section on BTPL Consumers

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<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Ttd.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTBEM)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

The Registrar;
(NEPRA)
Islamabad

Handwritten signature: Registrar

Date: 5.1.26
3/8

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

Submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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I respectfully request NEPRA to:

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

CHAIRMAN

Dy No. 24
Date: 02-01-26

Licensing Department
Dy. Secy. 2227
Date: 02-01-26

Yours sincerely.

(Engr. Dr. Nazeer Ahmad Anjum)

[BTPL Consumer /

H # 361, St # 17, Block B, Sector B-17, Multigardens, Islamabad

Registrar

From: Aijaz Hussain <aijazmalik@hotmail.com>
Sent: Tuesday, December 23, 2025 8:59 PM
To: registrar@nepra.org.pk
Subject: Objection to Draft NEPRA Regulation 2025

283
5-1-28

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA’s website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:
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Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Aijaz Hussain

[BTPL Consumer /01060221001303100
[House 1920. Street 62-A. Ali Block/ Phase –8. Rawalpindi

Forwarded please:
☒ For action ☐ For information

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
22-8
6-1-26

Registrar

From: Nasir Ali Choudhari <nasiramc@hotmail.com>
Sent: Wednesday, December 24, 2025 12:35 PM
To: Registrar@nepra.org.pk
Subject: NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (PROSUMER) REGULATIONS, 2025
Attachments: NEPRA_Prosumer_Regulations_Comments_2025.docx

Respected sir,

My comments on the captioned matter are attached.

NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (PROSUMER) REGULATIONS, 2025

1. Definitions

Clause (h): "Billing Cycle"

Proposed Comment:

The billing cycle should be defined as a calendar month rather than a fixed thirty-day period. A 30-day billing cycle results in cumulative displacement of meter reading dates by approximately five days annually, leading to inconsistencies in billing, reconciliation, and tariff application.

Legal Justification:

- Under principles of administrative law, regulatory definitions must promote certainty, predictability, and uniform application. A drifting billing cycle violates these principles by introducing systemic ambiguity.
- Most utility billing systems, including those regulated by NEPRA itself, are anchored to calendar months, ensuring consistency with tariff determinations, tax periods, and financial reporting obligations.

International Best Practice:

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<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CBMW)

For kind information please.

✓ Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

- United Kingdom (Ofgem), European Union electricity directives, U.S. Public Utility Commissions, and Australian Energy Regulator (AER) uniformly apply calendar-month billing cycles for distributed generation and net billing/net metering consumers.
- Calendar-month billing is recognized internationally as essential for transparent consumer protection and accurate regulatory oversight.

2. Rights and Obligations of the Prosumer

Clause 6(2): Restriction on Sale to Third Parties

Proposed Comment:

The absolute prohibition on utilizing the licensee's interconnection facilities for supplying electricity to any other person requires reconsideration. Clarification is needed regarding participation in CTBCM arrangements subject to payment of approved use-of-system charges.

Legal Justification:

- Section 7 and 8 of the NEPRA Act, 1997 emphasize promotion of competition, efficiency, and consumer choice. An outright restriction without provision for regulated access may be inconsistent with these statutory objectives.
- Denying access where system charges are recoverable may also raise concerns under principles of non-discriminatory network access.

International Best Practice:

- In jurisdictions such as Germany, Netherlands, UK, and parts of the U.S., prosumers are permitted to sell electricity to third parties or aggregators using distribution networks, subject to regulated wheeling and network charges.
- Modern electricity markets encourage prosumer participation to enhance grid resilience and decentralized generation.

3. Term of Agreement, Termination and Dispute Resolution

General Observation

Proposed Comment:

Despite explicit reference to “Dispute Resolution” in the heading, the section lacks substantive provisions. Dispute resolution mechanisms should be clearly articulated within this section rather than being dispersed elsewhere.

Legal Justification:

- Under contract law principles, particularly certainty and enforceability, dispute resolution mechanisms must be clearly defined within the governing agreement framework.
- Ambiguity in dispute resolution may expose parties to prolonged litigation, contrary to the objectives of regulatory efficiency.

International Best Practice:

- Regulatory frameworks in Singapore, UK, and Canada provide tiered dispute resolution: negotiation → regulator intervention → arbitration or tribunal.
- Embedding dispute resolution mechanisms enhances investor confidence and reduces regulatory friction.

4. Term of Agreement and Conditions

Clause 7(1) & (2): Agreement Duration

Proposed Comment:

Given the revised compensation structure and extended payback periods under net billing, reducing the initial agreement term to five years undermines investment feasibility. The initial term should remain seven (7) years, with subsequent renewals of five years.

A transitional mechanism must also be provided for prosumers who have already completed their initial term under earlier regulations.

Legal Justification:

- Sudden alteration of agreement duration without transitional safeguards may violate the doctrine of legitimate expectation, recognized by superior courts in Pakistan.

- Investors made capital commitments based on earlier regulatory assurances.

International Best Practice:

- India (CERC/SERCs), Malaysia, and Philippines maintain longer initial agreement terms (7–15 years).
- Transitional grandfathering is standard practice globally.

5. Responsibility for Interconnection Costs

Clause 12(1): Metering and Interconnection

Proposed Comment:

The regulation should clearly distinguish between initial installation and utility-initiated replacement of metering equipment. Where meter replacement is required for regulatory, operational, or system upgrades, the cost must be borne by the licensee.

Legal Justification:

- Consumer protection principles require that consumers not bear costs arising from utility-driven changes.
- Holding consumers liable for functional equipment replacement could be considered unjust enrichment.

International Best Practice:

- In EU member states, UK, and Australia, smart meter upgrades are funded by utilities.
- Consumers are charged only in cases of negligence or tampering.

6. Billing Mechanism and Tax Treatment

Clause 14(1): Dual Sale and Purchase Streams

Proposed Comment:

The regulation must explicitly clarify the tax treatment applicable to energy exported by prosumers.

Legal Justification:

- Tax liabilities must be clearly defined in law.
- Prosumers should not be treated as commercial suppliers unless expressly defined.

International Best Practice:

- In EU and OECD countries, exported residential solar energy is typically zero-rated or exempt.

7. National Average Energy Purchase Price – Reference Period

Clause 14(1)(b)

Proposed Comment:

The regulation must specify whether the applicable national average energy purchase price is monthly, quarterly, or annual.

Legal Justification:

- Lack of specificity violates the principle of certainty.
- Financial exposure varies materially depending on reference period.

International Best Practice:

- Regulators in UK (Ofgem) and India publish clearly defined periodic reference prices.

8. Revision of Rates During Agreement

Clause 14(3)

Proposed Comment:

Any revision of rates should apply prospectively only, with prior notice.

Legal Justification:

- Retrospective application undermines sanctity of contracts.
- Pakistani courts disfavor retrospective financial burdens.

International Best Practice:

- Globally, tariff revisions apply prospectively with notice periods.

9. Savings and Repeal

Clause 21

Proposed Comment:

The proposed savings clause effectively subjects existing prosumers to a new net billing regime.

Legal Justification:

- Retrospective alteration contradicts principles of fairness and legitimate expectation.
- Existing agreements must be honored until expiry.

International Best Practice:

- Grandfathering of existing installations is a universal principle.
- Retroactive changes have caused investor disputes internationally.

Regards,

Nasir Ali Choudhari

CNIC # 35202-3030684-3

Cell # 0320-1100352

Sent from my iPhone

Registrar

From: Raheel Akhtar <mraheelakhtar2@gmail.com>
Sent: Saturday, December 27, 2025 8:33 AM
To: registrar@nepra.org.pk
Subject: Net Metring

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Subject: Objections to NEPRA (Prosumer) Regulations, 2025 – Replacement of Net Metering with Net Billing

Dear Sir,

I am writing as a domestic electricity consumer and solar prosumer to formally record my serious concerns and objections regarding the proposed shift from **Net Metering** to **Net Billing** under the NEPRA (Prosumer) Regulations, 2025.

While I fully appreciate NEPRA’s responsibility to ensure grid stability and long-term sector sustainability, the replacement of net metering with net billing is, in my view, **economically unjustified, regressive for consumers, and counter-productive to Pakistan’s renewable energy objectives.**

1. Severe Erosion of Consumer Economics

Under net billing, exported units are credited at the *National Average Energy Purchase Price*, while imported units are billed at the *full applicable consumer tariff*, inclusive of capacity charges, taxes, and surcharges. This asymmetry fundamentally destroys the financial viability of rooftop solar investments. Consumers made long-term investment decisions in good faith based on net metering economics, and a sudden policy reversal significantly undermines regulatory credibility.

Discouragement of Renewable Energy Adoption

Pakistan faces chronic fuel import dependence, circular debt, and peak-hour shortages. Distributed solar under net metering directly reduces peak demand, transmission losses, and foreign exchange outflows. Net billing materially lengthens payback periods, discouraging new installations and effectively reversing the momentum achieved over the last decade.

3. Penalizing Self-Consumption Instead of Encouraging It

Net metering rewards efficient self-consumption and grid support. Net billing, on the other hand, penalizes consumers for exporting surplus daytime energy—energy which the grid urgently needs during solar hours—while charging them disproportionately for evening consumption.

4. Inconsistency with Policy Stability and Investor Confidence

Frequent and material changes to settled regulatory frameworks create uncertainty not only for

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (BROW)

For kind information please,
Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

individual consumers but also for installers, financiers, and local manufacturing ecosystems built around rooftop solar. Regulatory stability is essential for long-term planning and capital formation.

5. Alternative Solutions Exist Without Abolishing Net Metering

If NEPRA's concerns relate to grid stress or cross-subsidization, these can be addressed through:

- Time-of-Use based net metering adjustments
- Export caps aligned with sanctioned load
- Gradual grandfathering mechanisms
- Differential treatment for large commercial installations

6. Commercial vs Residential Net Metering

NEPRA must analyse, figure out and evaluate the consumption and impact of commercial and residential net metering separately and devise strategic and policy parameters for both segments separately. Commercial segments financial earning, net metering capacity, annual consumption and huge impact on the National grid would be much higher than the residential segment results. Devise policy without any change to the residential segment to save a common man from any undue and surprising burden which is matchless with the commercial sector.

A complete replacement of net metering with net billing is a blunt instrument that disproportionately harms small and middle-class consumers.

Request

In light of the above, I respectfully request NEPRA to:

- **Retain intact the same net metering framework as the primary framework** for rooftop solar consumers at least for the Residential sector of the country to provide safeguard to a common man and to keep inflation rate low
- Ensure **grandfathering protection** for existing and pipeline installations
- Engage stakeholders to introduce **refined, balanced adjustments** rather than an outright replacement
- Support Solar energy as a long term strategy to say goodbye to the heavy financial burdens of IPPs.

Pakistan urgently needs strategic policies that encourage energy efficiency, self-generation, and reduced grid burden. Net metering has demonstrably contributed to these objectives and should be strengthened—not dismantled.

Thank you for considering this submission.

Yours sincerely,

Mohammad Raheel Akhtar

Registrar

From: Zahid Riaz <zahidriaz80@gmail.com>
Sent: Tuesday, December 23, 2025 7:28 PM
To: registrar@nepra.org.pk
Cc: Chairman@nepra.org.pk; cad@nepra.org.pk; memberatariff@nepra.org.pk
Subject: Concerns Regarding Proposed Gross Metering Framework for Rooftop Solar Consumers

Dear Registrar,
National Electric Power Regulatory Authority (NEPRA),
Islamabad

I hope this message finds you well.

I am writing as a concerned electricity consumer and prospective rooftop solar user to respectfully register serious concerns regarding the proposed shift from net metering to a gross metering framework for new distributed solar installations.

Although I fully appreciate NEPRA's responsibility to safeguard grid stability, address revenue sustainability of DISCOs, and ensure fairness across consumer categories, the proposed gross metering mechanism raises significant practical and economic challenges for residential consumers in Pakistan, which merit reconsideration.

First, gross metering fundamentally weakens the economic rationale for rooftop solar for households. Under the proposed framework, consumers are required to purchase all electricity consumed at full retail tariffs while selling all solar generation at a substantially lower feed-in rate. This accounting separation effectively nullifies the benefit of self-consumption, even when solar power is generated and used simultaneously within the premises. As a result, households are forced into a **"sell cheap, buy expensive"** structure that materially increases payback periods and, in many cases, renders solar financially unviable.

Second, this approach disproportionately affects middle-income households who have adopted solar not as commercial generators, but as a hedge against rising tariffs, load-shedding, and supply uncertainty. Many such consumers rely on **bank financing** to install rooftop systems. Under gross metering, **fixed loan repayments combined with continued high electricity bills can actually increase monthly financial burden**, undermining consumer trust in regulatory predictability.

Third, gross metering fails to recognize the physical reality of distributed generation. **Rooftop solar reduces local demand on the grid, lowers transmission and distribution losses, and defers network investment.** Treating all generated energy as exported, regardless of instantaneous self-consumption, ignores these system-level benefits and discourages behavior that would otherwise reduce peak demand stress.

Fourth, the proposed framework risks slowing Pakistan's distributed **renewable energy adoption** at a time when energy affordability, import dependence, and climate commitments require acceleration rather than contraction. International experience suggests that abrupt policy reversals in rooftop solar regimes lead to market stagnation, legal disputes, and loss of investor and consumer confidence.

In light of these concerns, I respectfully urge NEPRA to consider alternative approaches, such as:

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<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input checked="" type="checkbox"/> ADG (Int.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input checked="" type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CHROM)
For kind information, please.	
<input checked="" type="checkbox"/> Chairman	<input type="checkbox"/> Z. M (Tech)
<input checked="" type="checkbox"/> M (Law)	<input type="checkbox"/> 4. M (Dev)

- **Retaining net metering for residential consumers up to a defined capacity threshold;**
- Introducing a hybrid or net-billing model that preserves self-consumption benefits while rationalizing export compensation;
- Explicitly recognizing behind-the-meter self-consumption as non-billable energy;
- Conducting transparent stakeholder consultations with residential consumers before finalizing the framework.

My intention in writing is not to oppose regulatory reform, but to advocate for a **balanced approach** that protects the grid and DISCO revenues without inadvertently penalizing responsible electricity consumers who have invested in clean, distributed energy solutions in good faith.

I sincerely hope NEPRA will take these consumer-level implications into account while finalizing its policy direction. I would be grateful if these concerns could be formally acknowledged and considered as part of the regulatory process.

Thank you for your time and attention.

Yours sincerely,

Dr. Zahid Riaz

MBA (IBA, Karachi), MPhil and PhD (UNSW, Australia).

Mobile. 0300 856 2587.

The Consumer Affairs Division
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Subject: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy

I am a registered Solar Net Metering consumer operating under a valid approval / license issued pursuant to the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. My particulars are provided below for official record:

Consumer Information:

Name: Syed Wajahat Hussain Rizwi
Postal Address: House 163, Street 5, F11/1 Islamabad
Distribution Company (DISCO): IESCO
Net Metering License No./ Reference No.: 04141270753700

Through this submission, I hereby lodge a **formal complaint** under NEPRA's Consumer Affairs framework against the recently notified **Solar Net Metering / Net Billing Policy**, on the following legal and regulatory grounds:

1. The new policy adversely affects existing net metering consumers who made capital investments based on the earlier notified regulations, approved tariffs, and legally executed agreements.
2. The retrospective or altered application of revised billing mechanisms undermines the principle of regulatory certainty and legitimate consumer expectation.
3. The policy materially changes the financial and commercial terms under which net metering licenses were granted, without adequate consumer consultation or transitional protection.
4. The revised framework discourages distributed generation and contradicts the objectives of renewable energy promotion, consumer protection, and sustainable power sector development.

It is respectfully submitted that all existing net metering consumers entered into binding agreements in good faith, relying on the continuity and stability of NEPRA's approved regulatory regime. Any unilateral modification impacting existing license holders raises serious consumer protection and regulatory compliance concerns.

Relief Sought:

In view of the above, I respectfully request NEPRA to:

- a) Safeguard the rights of existing net metering consumers by exempting them from the application of the new policy;
- b) Review the notified policy through due stakeholder consultation in accordance with best regulatory practices; and
- c) Ensure that any future regulatory changes are prospective in nature and compliant with consumer protection principles.

I request that this complaint be registered, acknowledged, and processed under NEPRA Consumer Affairs procedures, and I may be informed of the outcome accordingly.

Yours sincerely,

Registrar

From: Wajahat Rizvi <23whr53@gmail.com>
Sent: Saturday, December 27, 2025 8:52 PM
To: Registrar@nepra.org.pk
Attachments: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering Net Billing Policy_27Dec25.docx

Sent from my iPhone

Forwarded please:

<input checked="" type="checkbox"/> For new action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Muaaz Sheikh <muaaz.sheikh56@gmail.com>
Sent: Sunday, December 28, 2025 2:04 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town lahore Consumers

The Registrar
(NEPRA)
Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (.....) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Protect any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Sajjad Ahmad

Address: House # 19 overseas B extension Bahria Town Lahore

Forwarded please:
☒ For file action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Distribution Department
Play No 230
Date 6-1-26

Respected Sir,

This legal representation is submitted to formally place on record serious constitutional, legal, and equitable objections to the Draft NEPRA (Consumer) Regulations, 2025, which, if enforced in their present form, shall result in grave injustice, unlawful deprivation of property, and violation of fundamental rights guaranteed under the Constitution of the Islamic Republic of Pakistan.

It is respectfully stated that thousands of citizens, including myself, invested substantial personal capital into solar photovoltaic systems solely on the basis of express governmental policies, NEPRA regulations, and public assurances promoting Net Metering as a long-term, stable, and protected energy framework. These investments were made in good faith, in reliance upon regulatory continuity, and under the legitimate expectation that the State would not arbitrarily reverse or dilute its commitments.

Any retrospective modification to export valuation, settlement methodology, or economic viability of existing net-metering arrangements amounts to a direct breach of the Doctrine of Legitimate Expectation, a principle repeatedly upheld by the superior judiciary of Pakistan.

Such action further violates:

Article 4 – by denying citizens lawful treatment in accordance with due process;

Article 18 – by unlawfully restricting lawful economic activity and investment;

Article 24 – by effectively depriving citizens of the economic value of their lawfully acquired assets without compensation or legal justification; and

Article 25 – by subjecting a specific class of consumers (Consumers) to discriminatory, hostile, and unequal treatment.

The proposed regulatory framework seeks to shift the burden of systemic inefficiencies, line losses, electricity theft, and governance failures of DISCOs onto compliant and law-abiding citizens. Such a transfer of institutional failure onto private individuals is legally indefensible and constitutionally impermissible.

As a resident of Bahria Town Lahore, I further place on record that solar consumers are already facing arbitrary export reductions, unexplained deductions, and vague “miscellaneous charges” that lack transparency, justification, or legal foundation. Instead of correcting these violations, the proposed regulations appear to legitimize and institutionalize them.

It is respectfully submitted that public policy cannot be rewritten at the expense of citizens who acted in accordance with the law. A

State that invites investment and later penalizes compliance undermines not only investor confidence but also the rule of law itself.

Accordingly, you are hereby called upon to:

1) Withdraw or substantially revise the Draft NEPRA(Consumer)Regulations, 2025 insofar as they affect the consumers;

2) Ensure that no retrospective financial, technical, or operational burdens are imposed on current Consumers

3) Prevent the transfer of DISCO inefficiencies, losses, or governance failures onto compliant consumers;

4) Ensure transparency, uniformity, and constitutional conformity in billing and adjustment mechanisms nationwide.

Failure to address these concerns shall leave affected citizens with no option but to seek appropriate constitutional and legal remedies before the competent forums, including the Honourable High Courts, to safeguard their fundamental rights and lawful investments worth Billions of rupees collectively

This notice is issued in good faith and in the interest of justice, constitutional governance, and the long-term stability of Pakistan’s renewable energy framework.

Yours faithfully

Muhammad Farooq Memon

Resident, Bahria Town Lahore

Chairman NEPRA

From: Hajvery Tax <hajvery.tax@hajveryfoods.com>
Sent: Wednesday, December 31, 2025 5:21 PM
To: chairman@nepra.org.pk
Cc: registrar@nepra.org.pk
Subject: Non-Response on Net Metering Application of M/S Gourmet Oil & Ghee Mills
Attachments: Gourmet Oil & Ghee Mill_Letter.jpeg; Gourmet Oil & Ghee Mills_Certificate.jpeg; Gourmet Oil & Ghee Mills Complaint_Letter.pdf

To,
The Registrar,
National Electric Power Regulatory Authority (NEPRA),
NEPRA Tower, G-5/1, Islamabad, Pakistan.

Subject: Non-Response on Net Metering Application.

Dear Sir/Madam,

Referring to the Distributed Generation Concurrence No. NMC/17212/2025 Dt: December 12, 2025, granted by your good office to Gourmet Oil & Ghee Mills for 950.040 KW (**Copy Attached**), respectfully submit this complaint regarding the persistent inaction of Gujranwala Electric Power Company (GEPCO) and the Market Implementation & Regulatory Affairs Department (MIRAD) in processing and implementing our net metering application, despite NEPRA's clear approval and regulatory allowance for such facility.

Gourmet Oil & Ghee Mills has duly complied with all technical and procedural requirements mandated under NEPRA's Net Metering Regulations. However, despite repeated follow-ups, GEPCO and MIRAD have failed to take further action to operationalize our net metering arrangement. This delay is causing significant financial loss to our organization and undermines NEPRA's regulatory framework, which was designed to encourage renewable energy integration and consumer participation in distributed generation.

We request NEPRA's urgent intervention to:

- Direct GEPCO and MIRAD to immediately process and implement our net metering application.
- Safeguard the rights of consumers who have invested in renewable energy solutions in reliance on NEPRA's regulatory approvals.

We trust NEPRA will take prompt and decisive action to resolve this matter and uphold the integrity of its regulatory framework. Signed Copy of all documents is attached and also sent through TCS.

Thank you for your attention and support.
Yours faithfully,

Authorized Signatory
Gourmet Oil & Ghee Mill.

Forwarded please:

<input checked="" type="checkbox"/> For Rec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Int.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SEA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/Proc)

For kind information, please.

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dm)

CHAIRMAN
08
Dy No. 01-01-26
Date: 01-01-26

Gourmet Oil & Ghee Mills

To,
The Registrar,
National Electric Power Regulatory Authority (NEPRA),
NEPRA Tower, G-5/1, Islamabad, Pakistan.

Subject: Non-Response on Net Metering Application.

Dear Sir/Madam,

Referring to the Distributed Generation Concurrence No. NMC/17212/2025 Dt: December 12, 2025, granted by your good office to Gourmet Oil & Ghee Mills for 950.040 KW (Copy Attached), respectfully submit this complaint regarding the persistent inaction of Gujranwala Electric Power Company (GEPCO) and the Market Implementation & Regulatory Affairs Department (MIRAD) in processing and implementing our net metering application, despite NEPRA's clear approval and regulatory allowance for such facility.

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- Safeguard the rights of consumers who have invested in renewable energy solutions in reliance on NEPRA's regulatory approvals.

We trust NEPRA will take prompt and decisive action to resolve this matter and uphold the integrity of its regulatory framework.

Thank you for your attention and support.
Yours faithfully,



Authorized Signatory
Gourmet Oil & Ghee Mills.

Copy to:

1. Chief Executive Officer, Gujranwala Electric Power Company Ltd. (GEPCO), 565/A, Model Town, G. T. Road, Gujranwala.
2. Managing Director, Private Power Infrastructure Board (PPIB), Ground & 2nd Floor, Emigration Tower, Plot No. 10, Mauve Area, Sector G/8-1, Islamabad.

Address: Buttran Wall Slalkot Road, Gujranwala, Pakistan.
E-mail: gourmetoilgheemills@gmail.com **Ph No:** 0300-8427071



National Electric Power Regulatory Authority
Islamic Republic of Pakistan

NEPRA Tower, Attaturk Avenue (East) G-5/1, Islamabad
Phone: 2013200, Fax: 2000026

REGISTRAR

Website: www.nepra.org.pk, Email: info@nepra.org.pk

No. NEPRA/R/NMC-17212

50331-54

December 17, 2025

Gourment Oil & Ghee Mill
C/o Khalid Nawaz Chattha
Buttran Wali, Sialkot Road,
Gujranwala,
Contact No. 0300-3467827

Subject: Distributed Generation Concurrence No. NMC/17212/2025
Concurrence Application No. NMC-17212
Gourment Oil & Ghee Mill, GEPCO

Reference: GEPCO's letter No. 6600-04 dated 20/11/2025 received on 26/11/2025.

Enclosed please find herewith Distributed Generation Concurrence No. NMC/17212/2025 granted by the National Electric Power Regulatory Authority to Gourment Oil & Ghee Mill for 950.040 kW photo voltaic solar based distributed generation facility located at Buttran Wali, Sialkot Road, Gujranwala, pursuant to NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015.

2. Please quote above mentioned Distributed Generation Concurrence No. for future correspondence.

Enclosure: **Distributed Generation Concurrence**
(NMC/17212/2025)

Wasim Anwar Bhinder
(Wasim Anwar Bhinder)

Copy to:

1. Managing Director, Private Power Infrastructure Board (PPIB), Ground & 2nd Floor, Emigration Tower, Plot No. 10, Mauve Area, Sector G/8-1, Islamabad.
2. Chief Executive Officer, Gujranwala Electric Power Company Ltd., 565/A, Model Town, G.T. Road, Gujranwala
3. Director General, Environmental Protection Department, Government of Punjab, National Hockey Stadium, Ferozepur Road, Lahore Cantt.

Islamabad-Pakistan

DISTRIBUTED GENERATION CONCURRENCE

No. NMC/17212/2025

The Authority in terms of Section 14B (5) of the Regulation of Generation, Transmission and Distribution of Electric Power Act (XL of 1997) (the "Act"), hereby grants Concurrence for the Distributed Generation facility to be set up in the name of **Gourment Oil & Ghee Mill C/O Khalid Nawaz Chattha** having consumer **Reference Number 30 12212 2260004 U** at **Bultran Wali Sialkot Road Gujranwala**

2 The beneficiary shall abide by the provisions under the Act and NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations 2015 as amended from time to time

3 The technical parameters of the Net Metering arrangements are as under:-

(i)	Source of Generation	Solar Energy
(ii)	Size of Distributed Generation Facility	950 040 KW
Inverter Information		
(iii)	Manufacturer	SINENG
	Model No	SN-125PT *2
(iv)	Vendor/Installer	UNIK CONSTRUCTION (SMC-PVT) LTD
(v)	Generation Type	PV SOLAR

4 This Concurrence is issued for a period of seven (07) years and will expire on 12th day of DEC 2032 and may be renewed as stipulated under the Act or the relevant Regulations framed thereafter

5 This Concurrence is given under my hand on 12th day of DEC Two Thousand & Twenty Five.

Wazir Jinnah
Registrar



Registrar

From: Muhammad Tariq <tariqshad@gmail.com>
Sent: Saturday, December 27, 2025 8:58 PM
To: registrar@nepra.org.pk
Subject: Requests for the proposed policy change in Net metering.
Attachments: Reply to Nepra on Net Billing.docx

Dear Sir, Assalam o Alaikum

Kindly find attached the few suggestions to be considered before a major policy change in Net metering.

Regards,
Muhammad Tariq Ghafoor
Bahria town Lahore

✓
RECEIVED
27 DEC 2025
10:00 AM
REGISTRAR
NEPRA

Forwarded please:

<input checked="" type="checkbox"/> For pre-action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADK (Tid.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EPM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

RECEIVED
27 DEC 2025
10:00 AM
REGISTRAR
NEPRA

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Subject: Objections to NEPRA (Prosumer) Regulations, 2025 – Replacement of Net Metering with Net Billing

Dear Sir,

I am writing as a domestic electricity consumer and solar prosumer to formally record my serious concerns and objections regarding the proposed shift from **Net Metering to Net Billing** under the NEPRA (Prosumer) Regulations, 2025.

While I fully appreciate NEPRA's responsibility to ensure grid stability and long-term sector sustainability, the replacement of net metering with net billing is, in my view, **economically unjustified, regressive for consumers, and counter-productive to Pakistan's renewable energy objectives.**

1. Severe Erosion of Consumer Economics

Under net billing, exported units are credited at the *National Average Energy Purchase Price*, while imported units are billed at the *full applicable consumer tariff*, inclusive of capacity charges, taxes, and surcharges. This asymmetry fundamentally destroys the financial viability of rooftop solar investments.

Consumers made long-term investment decisions in good faith based on net metering economics, and a sudden policy reversal significantly undermines regulatory credibility.

2. Discouragement of Renewable Energy Adoption

Pakistan faces chronic fuel import dependence, circular debt, and peak-hour shortages.

Distributed solar under net metering directly reduces peak demand, transmission losses, and foreign exchange outflows.

Net billing materially lengthens payback periods, discouraging new installations and effectively reversing the momentum achieved over the last decade.

3. Penalizing Self-Consumption Instead of Encouraging It

Net metering rewards efficient self-consumption and grid support. Net billing, on the other hand, penalizes consumers for exporting surplus daytime energy—energy which the grid urgently needs during solar hours—while charging them disproportionately for evening consumption.

4. Inconsistency with Policy Stability and Investor Confidence

Frequent and material changes to settled regulatory frameworks create uncertainty not only for individual consumers but also for installers, financiers, and local manufacturing ecosystems built around rooftop solar. Regulatory stability is essential for long-term planning and capital formation.

Consumer
Pakistan

/

Prosumer

Mrs Amin Fatima

House No.4 , Street No.11 Sector-C,
DHA Phase-I, Islamabad

Telephone: 0316-5353815

1 Jan 2026

To: The Registrar (NEPRA)
NEPRA Tower, Attaturk Avenue (East),
G-5/1 Islamabad

Subject: **Objections to Draft NEPRA (Prosumer) Regulations, 2025**

1. I the undersigned submit my objections to the draft NEPRA (prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

2. The proposed changes to the net-metering/ prosumer framework will cause serious financial loss to solar consumer who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. The proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft and non-recovery of distribution companies, for which consumers are in no way responsible.

3. Such an approach is unjust, discriminatory and contrary to the objectives of renewable energy promotion, regulatory certainty and consumer protection.

4. I respectfully request NEPRA to reject any adverse or retrospective changes affecting existing net-metering consumers. Ensure that prosumers are not penalized to cover DISCO/ Utility losses and theft of electricity and protect solar consumer from arbitrary deductions, illegal charges and non-transparent billing practices.

5. Those objections may kindly be placed on record and duly considered before finalization of the regulations.

Forwarded please:

☒ For nodal action

☐ For information

<input checked="" type="checkbox"/> DG (Lic)	<input type="checkbox"/> DG (Admin)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> DG (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (TRM)

For kind information, please.

1. Chairman 2. M (Tech)

3. M (Law) 4. M (Dev)

Your's Sincerely

Amin Fatima

NEPRA

Licensing Department

Copy No. 155

Date: 6-1-26

Chairman NEPRA

From: Bilal imtiaz Bahria Town Lahore <bilalimtiaz4@gmail.com>
Sent: Wednesday, December 31, 2025 10:55 PM
To: Chairman@nepra.org.pk

We condemn new policy to Decrease purchase rate ...

Plz make sure that every citizen has right to Save money for their better future.... what government is doing for our old age medical and Children education or health.....?

We must have right to save our money...

Registrar

Chairman

Forwarded please:

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<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> C.A.	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTRM)

For kind information, please,

☒ Chairman ☒ M (Tech)
☒ M (Law) ☐ M (Dev)

Handwritten signature

By No. 23
Date: 5-1-26

CHAIRMAN
By No. 23
Date: 02-01-26

NEPRA
Licensing Department
By No. 153
Date: 6-1-26

Chairman NEPRA

From: Waleed Malik <waleed_malik2@yahoo.com>
Sent: Wednesday, December 31, 2025 7:18 PM
To: registrar@nepra.org.pk
Cc: chairman@nepra.org.pk
Subject: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy

Forwarded please:
☒ For info, action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/Reg)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (Admin)

For kind information, please,
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

I am a registered Solar Net Metering consumer operating under a valid approval / license issued pursuant to the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. My particulars are provided below for official record:

Consumer Information:

Name: Waleed Ahmed
Postal Address: House 486, Street 8, Sector G-11/1, Islamabad
Distribution Company (DISCO): IESCO

Through this submission, I hereby lodge a **formal complaint** under NEPRA's Consumer Affairs framework against the recently notified **Solar Net Metering / Net Billing Policy**, on the following legal and regulatory grounds:

1. The new policy adversely affects existing net metering consumers who made capital investments based on the earlier notified regulations, approved tariffs, and legally executed agreements.
2. The retrospective or altered application of revised billing mechanisms undermines the principle of regulatory certainty and legitimate consumer expectation.
3. The policy materially changes the financial and commercial terms under which net metering licenses were granted, without adequate consumer consultation or transitional protection.
4. The revised framework discourages distributed generation and contradicts the objectives of renewable energy promotion, consumer protection, and sustainable power sector development.

It is respectfully submitted that all existing net metering consumers entered into binding agreements in good faith, relying on the continuity and stability of NEPRA's approved regulatory regime. Any unilateral modification impacting existing license holders raises serious consumer protection and regulatory compliance concerns.

Relief Sought:

In view of the above, I respectfully request NEPRA to:

- a) Safeguard the rights of existing net metering consumers by exempting them from the application of the new policy;
- b) Review the notified policy through due stakeholder consultation in accordance with best regulatory practices; and
- c) Ensure that any future regulatory changes are prospective in nature and compliant with consumer protection principles.

I request that this complaint be registered, acknowledged, and processed under NEPRA Consumer Affairs procedures, and I may be informed of the outcome accordingly.

Yours sincerely,

Addl. DG (Lic.)	Addl. Dir. (DG)
AD-1	RO
TA	CA-I
CA-II	CA-III

CHAIRMAN
DY No. 03
Date: 01-01-26

Name: Waleed Ahmed

Date: 31/12/2025

Registrar

From: Mahmood Ali Khan <kitho53@yahoo.com>
Sent: Monday, December 29, 2025 9:45 AM
To: registrar@nepra.org.pk
Subject: : Objections to Draft NEPRA (Prosumer) Regulations, 2025

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 –

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (.....) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Dr Mehmood Ali Khan

Consumer No 1260035109

[House no 223 , sub sector B3 ,zone 3 Reggie Model Town Peshawar

Adm. DG	✓	Adm. Dir.	DD-1
AD-1	AD-2	PS	ES
AD-3	AD-4	AD-5	AD-6

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please.

1. Chairman 2. M (Tech)

3. M (Law) 4. M (Dev)

2.1.26
181
NEPRA
Licensing Department
Date: 16/12/25
5-1-26

02-01-26

8

Yahoo Mail: Search, organise, conquer

Registrar

From: Muhammad Hassan Mushtaq <hassan.mushtaq@uvas.edu.pk>
Sent: Monday, December 29, 2025 10:32 AM
To: registrar@nepra.org.pk
Subject: Objections on Draft Prosumer Regulations, 2025, NEPRA's press advertisement-12 Dec 2025

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Adm. DG	RO	PS	E/S
TA	QA-I	QA-II	QA-III

Respected Sir/Madam,

I am a domestic electricity consumer residing in Lahore and a rooftop solar prosumer who installed a solar photovoltaic system after making a substantial personal investment due to persistently rising electricity tariffs, fuel price adjustments, and the overall unaffordability of grid electricity.

I respectfully submit my comments and objections on the **Draft Prosumer Regulations, 2025**, issued through NEPRA's press advertisement dated 12 December 2025, in exercise of powers under **Section 47(3) of the NEPRA Act, 1997**.

My observations and concerns are outlined below:

1. Non-Retrospectivity and Protection of Vested Rights

A large number of domestic consumers invested in rooftop solar systems under the prevailing net-metering framework approved by NEPRA. These investments were made in good faith based on legitimate expectations regarding cost recovery and system payback.

Any application of revised regulations to existing prosumers would amount to **retrospective regulatory intervention**, which is inconsistent with principles of regulatory certainty, fairness, and protection of vested rights, and may undermine public trust in regulatory institutions.

2. Affordability and Socio-Economic Impact on Domestic Consumers

Domestic solar adoption has been primarily driven by excessive electricity tariffs, fuel surcharges, and unreliable supply, rather than commercial gain. Reductions in buy-back rates, imposition of additional grid charges, or adverse changes in settlement mechanisms will disproportionately impact middle-income households and may render previously viable investments financially unsustainable.

3. Alignment with National Energy Policy and Renewable Energy Objectives

Distributed generation through rooftop solar contributes positively to national energy objectives by:

- Reducing peak demand on the grid,
- Lowering transmission and distribution losses,
- Decreasing reliance on imported fossil fuels,
- Mitigating circular debt pressures, and

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For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Receiving Department
Date: 12.01.26
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180

- Supporting Pakistan's climate and sustainability commitments.

Regulatory changes that weaken incentives for rooftop solar risk contradicting these broader policy goals and may slow progress toward energy diversification and resilience.

4. **Cost-Benefit Recognition of Distributed Generation**

Domestic prosumers provide measurable system-level benefits, particularly during daytime peak hours. These benefits should be reflected through fair compensation mechanisms rather than treating small domestic prosumers on the same regulatory footing as commercial or utility-scale generators.

5. **Procedural Fairness and Stakeholder Consultation**

Given the widespread financial, legal, and social implications of the proposed Draft Prosumer Regulations, it is respectfully submitted that NEPRA should undertake:

- Comprehensive stakeholder consultations,
- Public hearings,
- Transparent cost-benefit and impact assessments, before finalizing and notifying the regulations, in line with principles of participatory regulation and good governance.

In view of the above, I humbly request NEPRA to:

- Ensure that any revised prosumer regulations are **prospective in application only**,
- Safeguard the rights and legitimate expectations of existing domestic prosumers,
- Maintain fair, predictable, and transparent net-metering and settlement mechanisms,
- Align regulatory decisions with national energy security, affordability, and renewable energy objectives.

I sincerely hope that NEPRA will give due consideration to the concerns of ordinary citizens who adopted solar energy as a necessary response to rising electricity costs and in the broader national interest.

Thank you for providing the opportunity to submit public comments under the NEPRA Act.

Yours sincerely,

Prof. Dr. Muhammad Hassan Mushtaq
Epidemiology and Public Health
University of Veterinary and Animal Sciences, Lahore
Pakistan (Phone No. 03464488875)
Domestic Electricity Consumer & Solar Prosumer

Registrar

From: Muhammad Hassan Mushtaq <hassan.mushtaq@uvas.edu.pk>
Sent: Monday, December 29, 2025 10:39 AM
To: registrar@nepra.org.pk
Subject: Further Comments and Objections refer to advertisement by NEPA draft prosumer regulations 2025

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Respected Sir/Madam,

I respectfully submit my objections to the **Draft NEPRA (Prosumer) Regulations, 2025**, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's official website, in accordance with Section 47(3) of the NEPRA Act.

The proposed changes to the net-metering/prosumer framework are likely to cause **serious and irreversible financial harm** to domestic solar consumers who installed rooftop solar systems under a duly approved legal and regulatory regime. These investments were made with **legitimate expectations of regulatory stability and access to affordable self-generated electricity**.

Any reduction in export value, alteration of settlement methodology, or adverse revision of compensation mechanisms would effectively deprive consumers of the economic benefits of their own investment and **defeat the very rationale of net-metering**, which was introduced to promote distributed renewable energy and consumer participation in energy generation.

As a consumer, I am already facing significant hardship due to:

- Arbitrary deduction or reduction of solar export units,
- Charges imposed under the guise of tariff adjustments without transparent justification, and
- So-called "Miscellaneous Charges" routinely added to electricity bills, which are neither clearly defined nor uniformly applied across electricity distribution companies in Pakistan.

These practices have already eroded consumer confidence and affordability. In this context, the proposed Draft Prosumer Regulations risk **further aggravating the financial burden on solar consumers**, effectively shifting the consequences of inefficiencies, technical losses, electricity theft, and non-recovery by distribution companies onto law-abiding prosumers—matters for which consumers bear no responsibility.

Such an approach is **unjust, discriminatory, and inconsistent** with the principles of consumer protection, regulatory certainty, and the national objective of promoting renewable energy. Penalizing domestic prosumers undermines trust in public institutions and discourages future investment in clean and distributed energy solutions at a time when the country urgently needs them.

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For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

In view of the foregoing, I respectfully request NEPRA to:

1. **Reject any adverse or retrospective changes** affecting existing net-metering and prosumer consumers;
2. Ensure that domestic prosumers are **not penalized to offset DISCO inefficiencies, system losses, theft, or revenue shortfalls**; and
3. Protect solar consumers from **arbitrary deductions, illegal or non-transparent charges, and opaque billing practices**, particularly in the case of local distribution companies.

I request that these objections kindly be placed on record and given due consideration before the Draft Prosumer Regulations, 2025 are finalized.

Thank you for providing the opportunity to submit public objections.

Yours sincerely,
Prof. Dr. Muhammad Hassan Mushtaq
UVAS, Lahore (03464488875).
Lahore, Pakistan

Domestic Electricity Consumer & Solar Prosumer

Registrar

From: Haider ali <drhaiderali110@gmail.com>
Sent: Wednesday, December 31, 2025 4:26 PM
To: registrar@nepra.org.pk
Subject: Objection to NEPRA draft

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who called solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Haider Ali
House 89,
Street 59
I-8/3 Islamabad—
Sent from my iPhone

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For kind information, please.

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

Registrar

From: Zafar Iftikhar <zafar.iftikhar@gmail.com>
Sent: Monday, December 29, 2025 8:20 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Sir,

Adm. DG	✓	Adm. Dir	DD-I
AD-I	RO	PS	E/S
TA	OA-I	OA-II	OA-III

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Iftikhar Haider

Consumer ID: 15143154484400U
House # 36, Street # 10, Falcon Complex

Forwarded please:

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For kind information, please.

✓ 1. Chairman 2. M (Tech)
✓ 3. M (Law) 4. M (Dev)

Registrar

From: Waleed Malik <waleed_malik2@yahoo.com>
Sent: Wednesday, December 31, 2025 7:18 PM
To: registrar@nepra.org.pk
Cc: chairman@nepra.org.pk
Subject: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy

I am a registered Solar Net Metering consumer operating under a valid approval / license issued pursuant to the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. My particulars are provided below for official record:

Consumer Information:

Name: Waleed Ahmed

Postal Address: House 486, Street 8, Sector G-11/1, Islamabad

Distribution Company (DISCO): IESCO

Through this submission, I hereby lodge a **formal complaint** under NEPRA's Consumer Affairs framework against the recently notified **Solar Net Metering / Net Billing Policy**, on the following legal and regulatory grounds:

1. The new policy adversely affects existing net metering consumers who made capital investments based on the earlier notified regulations, approved tariffs, and legally executed agreements.
2. The retrospective or altered application of revised billing mechanisms undermines the principle of regulatory certainty and legitimate consumer expectation.
3. The policy materially changes the financial and commercial terms under which net metering licenses were granted, without adequate consumer consultation or transitional protection.
4. The revised framework discourages distributed generation and contradicts the objectives of renewable energy promotion, consumer protection, and sustainable power sector development.

It is respectfully submitted that all existing net metering consumers entered into binding agreements in good faith, relying on the continuity and stability of NEPRA's approved regulatory regime. Any unilateral modification impacting existing license holders raises serious consumer protection and regulatory compliance concerns.

Relief Sought:

In view of the above, I respectfully request NEPRA to:

- a) Safeguard the rights of existing net metering consumers by exempting them from the application of the new policy;
- b) Review the notified policy through due stakeholder consultation in accordance with best regulatory practices; and
- c) Ensure that any future regulatory changes are prospective in nature and compliant with consumer protection principles.

I request that this complaint be registered, acknowledged, and processed under NEPRA Consumer Affairs procedures, and I may be informed of the outcome accordingly.

Addl. DG	<input checked="" type="checkbox"/>	Addl. Dir.	<input type="checkbox"/>
ADG	<input type="checkbox"/>	PS	<input type="checkbox"/>
ADG	<input type="checkbox"/>	QA/II	<input type="checkbox"/>

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<input type="checkbox"/> SEA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CICOM)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA

Licensing Department
Reply No. 124
S-1-26



Yours sincerely,

Name: Waleed Ahmed

Date: 31/12/2025

Registrar

From: Faisal Aziz <faisalaziz43016@gmail.com>
Sent: Wednesday, December 31, 2025 11:16 PM
To: registrar@nepra.org.pk
Subject: Objections to Publication of Draft of The NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on IESCO Consumers

It is submitted that I have objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering / prosumer framework will create great financial losses of serious nature to the consumers of solar energy and thus is going to affect them in a manner that their heavy investment on the solar systems installed under an approved legal regime with legitimate expectations of affordable electricity as these consumers had a purpose to save money, get rid of heavy electricity bills and support the electricity supply mechanism at the national level. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity, support the national grid system and defeat the very purpose of net-metering.

As a consumer of IESCO I am already adversely affected by:

- Arbitrary deduction / reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Miscellaneous Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.
- In this background, the proposed draft regulations will further aggravate the financial exploitation of solar energy consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.
- Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

- Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO / utility losses and theft of electricity and protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Major Faisal Aziz (Retired)

IESCO Consumer Address:

House Number 430 Street 16 Chaklala Scheme 3 Rawalpindi

Adl. DG	AD-I	RO	Adl. Dir	DD-I
	TA	CA-I	PS	E/S
		OA-II	OA-III	

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For kind information, please:
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Farrukh Husnain <farrukhhusnain@gmail.com>
Sent: Thursday, January 1, 2026 11:44 AM
To: registrar@nepra.org.pk
Subject: Serious Concerns on Proposed Discontinuation of Net Metering – Economic, Environmental and International Commitments Impact

Dear Sir,

Addl. DG	Dir.	Addl. Dir.	DD-I
AD-I	RC	PS	ES
TA	QA-I	QA-II	QA-III

I write to respectfully submit serious concerns regarding the proposed discontinuation of the existing **net-metering regime** and its replacement with a **net-billing / gross-billing mechanism**, as reflected in the recently issued draft rules.

While the challenges faced by the power sector are fully acknowledged, the proposed policy change is likely to produce **far-reaching negative consequences** for Pakistan's economy, energy security, climate commitments, and international standing.

1. Adverse Impact on Small Consumers and Renewable Adoption

Net metering has been a key driver in enabling **small residential consumers (≤ 15 kW)** to adopt rooftop solar, providing relief from high electricity tariffs while contributing clean energy to the grid. As of November 2025, Pakistan has approximately **424,000 net-metering consumers**, of which nearly **70% are residential users**.

Under the proposed net-billing mechanism, exported solar electricity would be compensated at approximately **Rs 9–13 per unit**, while imported electricity would be charged at **Rs 55–65 per unit**, significantly extending payback periods and making rooftop solar financially unattractive for households.

This contrasts sharply with regional best practices, where countries such as **India continue true net metering for systems up to 10 kW**, resulting in faster payback periods and sustained renewable growth.

2. Increased Foreign Exchange Outflows and Economic Pressure

The proposed policy will push consumers away from grid-tied solar systems toward **hybrid systems with lithium battery storage**, as exporting power to the grid becomes uneconomical.

This shift will result in **substantial additional foreign exchange outflows**, as lithium batteries and hybrid inverters are fully imported. Conservative estimates indicate an **additional USD 2,500–3,000 per 10 kW system**, translating into:

- **USD 275 million** for just 100,000 systems
- **USD 1.38 billion** if adoption reaches 500,000 systems

At a time when Pakistan is struggling with constrained foreign exchange reserves, this policy would place an avoidable and unsustainable burden on the national economy.

Forwarded please:

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA

Planning Department
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Info: S-1-26

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3. Environmental Consequences and Climate Commitments

Pakistan is among the countries most vulnerable to climate change and has made repeated commitments at **COP forums** and other international platforms to:

- Increase the share of renewable energy
- Reduce greenhouse gas emissions
- Promote decentralized, clean energy solutions

Curtailling net metering will **discourage rooftop solar adoption**, slow the energy transition, and increase reliance on fossil-fuel-based grid power. This directly contradicts Pakistan's **Nationally Determined Contributions (NDCs)** and undermines the credibility of our commitments in the global climate community .

The environmental cost of reduced solar adoption will be borne not only by Pakistan but will also weaken collective global efforts to mitigate climate change.

4. Questionable System Impact Justification

It is also pertinent to note that, as stated before NEPRA by the **Central Power Purchasing Agency (CPPA)** in November 2025, the increase in rooftop solar has **not caused a significant adverse impact on grid offtake**, and withdrawals from the grid have remained largely stable .

The underlying financial stress in the power sector primarily stems from **capacity payment obligations and structural policy inefficiencies**, rather than net-metering consumers. Shifting this burden onto clean-energy adopters risks eroding public trust and policy consistency.

5. Constructive Way Forward

Instead of abolishing net metering, it is respectfully suggested that NEPRA may consider:

- **Retaining net metering for residential systems up to 10 kW**
- Introducing **reasonable grid usage, line loss, or service charges** where justified
- Exploring **carbon credit mechanisms** allowing DISCOs to monetize emissions reductions in international markets
- Aligning energy policy with climate, industrial, and foreign exchange objectives in a coherent manner

Such measures would balance system costs while preserving investor confidence, environmental gains, and Pakistan's international obligations.

Conclusion

The discontinuation of net metering risks reversing a rare energy policy success story, with long-term consequences that far outweigh short-term fiscal considerations. A stable, forward-looking renewable policy is essential not only for Pakistan's energy future but also for its standing as a responsible member of the global community.

It is therefore earnestly requested that NEPRA **reconsider the proposed changes**, engage in transparent public consultation, and adopt a balanced approach that protects consumers, the environment, and national interests.

Thank you for your time and consideration.

--

Regards,

Capt. Farrukh Husnain

Cell: +92 300 8254216

December 30, 2025

The Registrar
National Electric Power Regulatory Authority (NEPRA)
NEPRA Tower, Ataturk Avenue (East)
G-5/1
Islamabad

Adtl. DG	✓	Adtl. Dir.	OD-I
AD-I	RO	PS	ES
TA	OA-I	OA-II	OA-III

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Subject: **Objections to Draft NEPRA (Prosumer) Regulations, 2025**
Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan. In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible. Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Forwarded please:

☒ For nec. action ☐ For Information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTRCM)

For kind information, please.

✓ 1. Chairman 2. M (Tech)
✓ 3. M (Law) 4. M (Dev)

02.01.26

NEPRA
Licensing Department
Ref. No. 127
Date 5-1-26

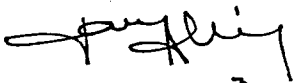
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Reject any adverse or retrospective changes affecting existing net-metering consumers.

Ensure that prosumers are not penalized to cover DISCO / utility losses and theft of electricity and protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,



TARIQ ALTAF
BTPL Consumer
Reference No. 16 11252 0662700U
161 Upper Mall Scheme
Lahore 54000

Date. 29.12.2025

The Registrar
(NEPRA)
Islamabad

Sir,

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

(Awais Asif Khan)
Account # 0400004803734

Address : House # B 64
SBCHS Block # 12
Gulistan e Johar
Karachi

Addl. DG	✓	Addl. Dir.	DD-I
AD-I	RO	PS	E/S
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Forwarded please:

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For kind information, please,

Chairman 2. M (Tech)

2. M (Law) 4. M (Dev)

02.01.26

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2.1.26

NEPRA
Planning Department
Copy No. 128
Date 5-1-26

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:03 PM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 - Additional Adverse Impact on Bahria town Lahore Consumers.

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 - Additional Adverse Impact on Bahria town Lahore Consumers.

Date: 2025-12-29 09:40

From: cad@nepra.org.pk

To: Zabihullah <zabihullah@nepra.org.pk>

Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 - Additional Adverse Impact on Bahria town Lahore Consumers.

Date: 2025-12-26 17:57

From: Muhammad Ahmed Butt <muhammadahmedbutt11@gmail.com>

To: cad@nepra.org.pk

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of 10 KWH netmetering I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, legal charges imposed under the guise of tariff adjustments, and "Misc.Charges"

Continuously added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan. In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Best Regards,

Muhammad Ahmed Butt 1- Tulip Block, Sector C, Bahria Town, Lahore 0321-6901020.

--

Regards

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:03 PM
To: Shahid Farooque
Subject: Fwd: Net Metering Policy

----- Original Message -----

Subject: Fwd: Net Metering Policy
Date: 2025-12-29 09:40
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net Metering Policy
Date: 2025-12-26 20:39
From: Tariq Mahmud <tm_1954@yahoo.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[Tariq Mahmud]

[BTPL Consumer /
[H/12, St 15, Sector C, DHAI-2, Islamabad] Yahoo Mail: Search, organise, conquer [1]

Links:

[1]

https://mail.onelink.me/107872968?pid=nativeplacement&c=US_Acquisition_YMktg_315_SearchOrgConquer_EmailSignature&af_sub1=Acquisition&af_sub2=US_YMktg&af_sub3=&af_sub4=100002039&af_sub5=C01_Email_Static_&af_ios_store_cpp=0c38e4b0-a27e-40f9-a211-f4e2de32ab91&af_android_url=https://play.google.com/store/apps/details?id=com.yahoo.mobile.client.android.mail&listing=search_organize_conquer

--

Regards



Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:03 PM
To: Shahid Farooque
Subject: Fwd: Feedback- Nepra Prosumer Regulations2025

----- Original Message -----

Subject: Fwd: Feedback- Nepra Prosumer Regulations2025
Date: 2025-12-29 09:39
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Feedback- Nepra Prosumer Regulations2025
Date: 2025-12-26 21:27
From: <ceo@ages.pk>
To: <Chairman@nepra.org.pk>
Copy: <Registrar@nepra.org.pk>, <cad@nepra.org.pk>

Dear Sir,

We do understand that in the last couple of years, production and revenue from energy supply have dynamically changed, and we are also aware of the new policy which will help DISCOs to generate more direct revenue.

The new policy has two impacts on solar users and the Government :

1. Financial
2. Environmental

Several users have already raised their proper and genuine concerns regarding financial impact. Our few cents on Environmental Impact are below:

1. As per the new policy, the on-Grid solar system is limited to a sanctioned load based on the transformer rating of the area and user population, but legally users can have any solar capacity as an off-grid (Hybrid) system.
2. By limiting the on-grid capacity to the sanctioned load, the only option left is for the users to install the hybrid system to cover their needs from battery backup when direct solar energy is not available.

This will trigger a boom in the lithium battery imports in the country.

3. Lithium is categorized as a Hazardous Material:

Environmental Hazards: Improper disposal releases toxic chemicals (cobalt, nickel, lithium) that contaminate soil, water, and harm ecosystems.

Fire Risk: Lithium batteries can ignite or explode in garbage trucks or incinerators if mixed with flammable waste.

So, the new Policy will generate some revenue for DISCO's at the cost of putting all solar users at Fire & Environment risk.

4. As per international regulations, after EOL (End of Life), lithium batteries have to be disposed of according to the strict environmental procedure by a certified recycler, which at the moment is not available in the country.

5. In our country, most of the taxes are indirect taxes. Why don't increase indirect revenue by selling green solar energy to the dying industry at cheaper rates? Which will help to increase the exports in the country to have a more stable economy, rather than supporting only DISCOs?

My team is more than happy to provide further details on this if required.

Mustaghees Ahmad

03119805112



--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:02 PM
To: Shahid Farooque
Subject: Fwd: New billing policy - Net metering

----- Original Message -----

Subject: Fwd: New billing policy - Net metering
Date: 2025-12-29 09:39
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: New billing policy - Net metering
Date: 2025-12-26 21:35
From: sajid bagri <sajidbagri381@gmail.com>
To: cad@nepra.org.pk

Sent from my iPhone

AOA , hope must be fine , it is heard about subject policy . It is humbly requested that policies should consumers supporting.

The net metering policy agreements already concluded with consumers at least should not be changed.

Request for kind consideration

Thanks & regards

Sajid Abrar Bagri

gards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:02 PM
To: Shahid Farooque
Subject: Fwd: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy

----- Original Message -----

Subject: Fwd: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy
Date: 2025-12-29 09:39
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----


Subject: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy
Date: 2025-12-26 23:47
From: Umoori <umartariq38@gmail.com>
To: Chairman@nepra.org.pk, cad@nepra.org.pk, Registrar@nepra.org.pk

I am a registered Solar Net Metering consumer operating under a valid approval / license issued pursuant to the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. My particulars are provided below for official record:

Consumer Information:

Name: Tariq Mehmood Raja

Postal Address: House KK54, Sher Ahmed Road, Khanna Kok, Rawalpindi Distribution Company (DISCO): IESCO Net Metering License No./ Reference No.: 14316101204

Through this submission, I hereby lodge a formal complaint under NEPRA's Consumer Affairs framework against the recently notified Solar Net Metering / Net Billing Policy, on the following legal and regulatory grounds:

1. The new policy adversely affects existing net metering consumers who made capital investments based on the earlier notified regulations, approved tariffs, and legally executed agreements.
2. The retrospective or altered application of revised billing mechanisms undermines the principle of regulatory certainty and legitimate consumer expectation.
3. The policy materially changes the financial and commercial terms under which net metering licenses were granted, without adequate consumer consultation or transitional protection.
4. The revised framework discourages distributed generation and contradicts the objectives of renewable energy promotion, consumer protection, and sustainable power sector development.

It is respectfully submitted that all existing net metering consumers entered into binding agreements in good faith, relying on the continuity and stability of NEPRA's approved regulatory regime. Any unilateral modification impacting existing license holders raises serious consumer protection and regulatory compliance concerns.

Relief Sought:

In view of the above, I respectfully request NEPRA to:

- a) Safeguard the rights of existing net metering consumers by exempting them from the application of the new policy;
- b) Review the notified policy through due stakeholder consultation in accordance with best regulatory practices; and
- c) Ensure that any future regulatory changes are prospective in nature and compliant with consumer protection principles.

I request that this complaint be registered, acknowledged, and processed under NEPRA Consumer Affairs procedures, and I may be informed of the outcome accordingly.

Yours sincerely,

Tariq Mehmood Raja

26 December 2025

--

Regards

Lashkar Khan Qambrani

Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:02 PM
To: Shahid Farooque
Subject: Fwd: Billing!

----- Original Message -----
Subject: Fwd: Billing!
Date: 2025-12-29 09:37
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----
Subject: Billing!
Date: 2025-12-27 09:16
From: Dushka <dushka50@yahoo.com>
To: cad@nepra.org.pk

My complaint is that this is going to result in very high bills for all consumers!
Dr Dushka Hyder Saiyid (w/o) Senator Mushahid Hussain Sayed!
Sent from my iPhone

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:01 PM
To: Shahid Farooque
Subject: Fwd: Request for Not implementing New Net Billing Policy

----- Original Message -----

Subject: Fwd: Request for Not implementing New Net Billing Policy
Date: 2025-12-29 09:36
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Request for Not implementing New Net Billing Policy
Date: 2025-12-27 12:07
From: Irum Tanzeel <irumtanzeel@gmail.com>
To: Chairman@nepra.org.pk, cad@nepra.org.pk, Registrar@nepra.org.pk

Dear Chairman NEPRA,

I'm writing to express concern about the new Net Billing Policy launching on Jan 14, 2026. The policy affects existing net metering users significantly. I request exemption for old users or reconsideration of purchase rates (Rs. 27 for old vs Rs. 11.5 for new users).

This change impacts fairness and solar investment viability. I urge NEPRA to reconsider and involve broader stakeholder participation.

Sincerely,

Irum Tanzeel.


Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:01 PM
To: Shahid Farooque
Subject: Fwd: Net Metering

----- Original Message -----

Subject: Fwd: Net Metering
Date: 2025-12-29 09:35
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net Metering
Date: 2025-12-27 12:52
From: asif zaman <asifzn74@gmail.com>
To: cad@nepra.org.pk

It will be very unfortunate if any change has been made by Government in net Metering policy for existing old clients, it will be shattered the confidence on Government policies in the future.

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:45 AM
To: Shahid Farooque
Subject: Fwd: Net Metering Policy

----- Original Message -----

Subject: Fwd: Net Metering Policy
Date: 2025-12-26 09:36
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net Metering Policy
Date: 2025-12-25 20:29
From: omar hayat <omarhay1@hotmail.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

As a consumer, I disagree with NEPRA's new solar policy because it drastically reduces the financial benefits of rooftop solar, undermines incentives for clean energy adoption, and adds unnecessary regulatory hurdles.

Key Points of Disagreement

- Sharp reduction in buyback rate: The new net billing framework cuts compensation for surplus electricity from Rs25.98 per unit to Rs11 per unit, slashing consumer returns by more than half The Nation +2.
- Shorter contract duration: Agreements have been reduced from seven years to five years, creating uncertainty and discouraging long-term investment.
- Licensing burden: Even small-scale solar systems (below 25 kW) now require a NEPRA licence, adding bureaucracy and cost for ordinary households.
- Loss of consumer empowerment: Under net metering, consumers could offset their bills directly. Net billing forces them to sell at a low fixed rate while buying electricity at much higher tariffs.
- Risk to renewable adoption: By weakening incentives, the policy could slow Pakistan's transition to clean energy at a time when climate vulnerability and rising fuel imports demand stronger support for renewables.

Regards

Omar

A Concerned Consumer

Get Outlook for iOS [1]

Links:

[1] <https://aka.ms/o0ukef>

--

Regards

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:44 AM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2025-12-26 09:36
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>


----- Original Message -----

Subject:
Date: 2025-12-25 20:34
From: Mohammad Haquiqe <haqeeq1969@gmail.com>
To: cad@nepra.org.pk

New net metering policy ..

Dear sir AOA..
Hope u ll be fine..
Heard about some news about net metering policy change..
I'm sure this won't be affecting a user like me who has agreement of 7 years nd invested precious saving last year..
Plz confirm about it..as people saying some nonsense things ..I'm sure nepra/govt won't do something unlawfull..
Best regards

--
Regards

 Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:44 AM
To: Shahid Farooque
Subject: Fwd: Request to Honor Existing Net Metering Agreements

----- Original Message -----

Subject: Fwd: Request to Honor Existing Net Metering Agreements
Date: 2025-12-26 09:34
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Request to Honor Existing Net Metering Agreements
Date: 2025-12-25 20:52
From: Hameedullah Khattak <khanewalseed@gmail.com>
To: cad@nepra.org.pk

To

The Chairman / Honorable Members

National Electric Power Regulatory Authority (NEPRA)

Respected Sir,

I respectfully submit that I am a MEPCO (WAPDA) net metering consumer, and approximately two years ago I obtained a net metering connection under the tariff-based agreement duly approved and regulated by NEPRA at that time.

It has recently been reported through various sources that a revised net metering policy is under consideration, and that its provisions may also be applied to existing consumers who are already bound by valid and subsisting agreements. This has caused serious concern among existing net metering consumers, including myself, as our agreements are still well within their contractual duration.

Relying on the prevailing policy framework and the approved agreement, we invested a substantial amount of capital, amounting to millions of rupees to install solar power systems. Any retrospective application of a new policy on existing agreements would not only undermine investor confidence but also result in unjust financial loss, effectively rendering our investments unviable.

It is therefore humbly requested that all existing net metering agreements be allowed to continue until their completion in accordance with the terms originally approved, and that any new or revised policy be applied strictly to new connections only. Such an approach would uphold the principles of contractual sanctity, fairness, and regulatory consistency.

I further request that this representation and protest be placed before the competent authority and given due consideration in the larger public interest.

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:44 AM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2025-12-26 09:31
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject:
Date: 2025-12-25 21:43
From: Kamran Masud <drkamranmasud59@gmail.com>
To: cad@nepra.org.pk

Kindly dont stop netmetering

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 4:28 PM
To: Shahid Farooque
Subject: Fwd: Formal Objection to Proposed Changes in Net Metering Policy as Referenced in NEPRA SRO

----- Original Message -----

Subject: Fwd: Formal Objection to Proposed Changes in Net Metering Policy as Referenced in NEPRA SRO
Date: 2026-01-05 16:20
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Formal Objection to Proposed Changes in Net Metering Policy as Referenced in NEPRA SRO
Date: 2026-01-05 16:04
From: MrTech02 A <arshad.electrotech@gmail.com>
To: cad@nepra.org.pk, Registrar@nepra.org.pk

To
The Registrar
National Electric Power Regulatory Authority (NEPRA) Islamabad, Pakistan

Subject: Formal Objection to Proposed Changes in Net Metering Policy as Referenced in NEPRA SRO

Dear Sir,

We are writing to formally oppose the proposed changes to the Net Metering framework as referenced in the recent NEPRA SRO and the public clarification reported in the following article:
<https://techcontent2025.blogspot.com/2025/12/nepra-clarifies-status-of-new-net.html>

After careful review, we respectfully submit that the proposed policy is fundamentally unfair, economically unjustified, and detrimental to the growth of distributed renewable energy in Pakistan.

KEY CONCERNS:

*

Unfair Reduction in Buyback Value

The proposed shift from unit-to-unit net metering to net billing, with electricity export credited at a significantly lower rate while imports remain charged at full retail tariffs, places an unjust financial burden on solar consumers. This imbalance undermines the core principle of net metering and drastically extends payback periods for existing and future installations.

*

Violation of Regulatory Certainty and Legitimate Expectations Thousands of consumers and businesses invested in rooftop solar systems based on the stability of existing NEPRA regulations. Abrupt policy changes without adequate transition mechanisms or grandfathering provisions erode investor confidence and violate the principle of regulatory predictability.

*

Negative Impact on Renewable Energy Adoption Rooftop solar and net metering have played a critical role in reducing grid pressure, lowering peak demand, and providing relief to consumers amid rising electricity costs. Weakening incentives at this stage is counter-productive to national renewable energy targets and energy security objectives.

*

Lack of Transparent Stakeholder Consultation The manner in which these changes have surfaced—amid conflicting interpretations by DISCOs and the absence of a clearly notified and consultative process—has created confusion, uncertainty, and inconsistent implementation across regions.

*

Disproportionate Impact on Residential and Small Commercial Consumers The proposed policy changes disproportionately affect households and small businesses that adopted solar as a cost-saving and sustainability measure, while offering no meaningful relief from high grid tariffs.

 REQUEST:

In light of the above, we respectfully request NEPRA to:

*

Reconsider and withdraw the proposed changes in their current form

*


Maintain the existing net metering mechanism for current and near-term applicants

*

Conduct a transparent stakeholder consultation process before introducing any revisions

*

Ensure that any future policy changes include fair transition and protection for existing investors

 We firmly believe that energy policy reforms must balance grid sustainability with consumer fairness, and that abrupt, one-sided changes risk undermining public trust in regulatory institutions.

We requested that this objection be placed on record and considered in any further deliberations on the matter.

Thank you for your time and consideration.

Yours sincerely,

[Arshad Mehmood]

[Director Of Technology and Operations.] [Contrast Engineering] [0339-2101555]

--

Regards

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:04 PM
To: Shahid Farooque
Subject: Fwd: Urgent Objection to Proposed Net Billing Policy and Request for Exemption of Existing Net Metering Consumers

----- Original Message -----


Subject: Fwd: Urgent Objection to Proposed Net Billing Policy and Request for Exemption of Existing Net Metering Consumers

Date: 2025-12-30 09:06

From: cad@nepra.org.pk

To: Zabihullah <zabihullah@nepra.org.pk>

Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Urgent Objection to Proposed Net Billing Policy and Request for Exemption of Existing Net Metering Consumers

Date: 2025-12-29 20:58

From: Nazar Iqbal <nazar422iqbal@gmail.com>


To: cad@nepra.org.pk

Copy: Chairman@nepra.org.pk

Respected Chairman and Members of NEPRA,

I am writing to express my serious concern and strong objection to the proposed Net Billing Policy, scheduled to take effect from 14 January 2026, as recently published on the NEPRA website.

The proposed policy, particularly the drastic reduction in purchase rates and its applicability to existing net metering licensees, will have severe financial implications for consumers who invested in solar systems under the current Net Metering

framework. These investments were made in good faith based on clearly defined policies, payback periods, and long-term assurances. Applying the new policy to existing users undermines regulatory certainty and public trust.

While it is noted that the proposed purchase rate for existing users is stated as Rs. 27/unit compared to Rs. 11.5/unit for new users, even this change significantly alters the originally approved economic model and will negatively impact thousands of households and businesses.

Furthermore, the public hearing process appears to have had limited and restricted participation, which does not adequately reflect the views and concerns of the majority of affected consumers.

In light of the above, I respectfully request NEPRA to:

*

Completely exempt existing net metering consumers from the proposed Net Billing Policy, and allow them to continue under the original net metering terms for the approved system life.

*

Conduct broader and transparent stakeholder consultations with meaningful consumer participation before finalizing any such policy changes.

*

Reconsider the proposed purchase rates to ensure fairness, sustainability, and continued encouragement of renewable energy adoption in Pakistan.

Net metering has played a vital role in reducing grid load, promoting clean energy, and empowering consumers. Abrupt and retrospective policy changes risk reversing these gains and discouraging future investments in renewable energy.

I urge NEPRA to reconsider this policy in the larger public interest and uphold regulatory consistency and consumer confidence.

Thank you for your time and consideration.

Yours sincerely,
Nazar Iqbal



Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:04 PM
To: Shahid Farooque
Subject: Fwd: Net metering

----- Original Message -----

Subject: Fwd: Net metering
Date: 2025-12-30 09:06
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net metering
Date: 2025-12-29 23:03
From: Anwar Halim <annu145@icloud.com>
To: cad@nepra.org.pk

To whom it may concern

There news on print and social media that net metering will be replaced by net billing.

How is that possible. The government of Pakistan has promoted the solarisation process. Now the people said Labaik to it and invested billions of dollars to get solar system installed.

Now how any one can come and change the tariff or the solar policy by a stroke of pen. This will have lasting consequences on the voters.

The minister for energy must step in and the PM who has been giving Bhashan on solarisation should take stand, otherwise masses will react and show their anger in elections.

Please look into the matter with serious deliberation and don't listen to corrupt bureaucrats.

Sent from my iPhone

--

 Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:04 PM
To: Shahid Farooque
Subject: Fwd: Replacement of Net metering

----- Original Message -----

Subject: Fwd: Replacement of Net metering
Date: 2025-12-30 09:05
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Replacement of Net metering
Date: 2025-12-30 08:02
From: qamar mehboob <qamarmehboob@yahoo.co.uk>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Any new metering system to replace the existing net metering system is not acceptable & highly condemned.

Yahoo Mail: Search, organise, conquer [1]

Links:

[1]

https://mail.onelink.me/107872968?pid=nativeplacement&c=US_Acquisition_YMktg_315_SearchOrgConquer_EmailSignature&af_sub1=Acquisition&af_sub2=US_YMktg&af_sub3=&af_sub4=100002039&af_sub5=C01_Email_Static_&af_ios_store_cpp=0c38e4b0-a27e-40f9-a211-f4e2de32ab91&af_android_url=https://play.google.com/store/apps/details?id=com.yahoo.mobile.client.android.mail&listing=search_organize_conquer

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:04 PM
To: Shahid Farooque
Subject: Fwd: Reject new net billing policy

----- Original Message -----

Subject: Fwd: Reject new net billing policy
Date: 2025-12-30 09:04
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Reject new net billing policy
Date: 2025-12-30 08:17
From: shahid muhammad <shahid_chme@yahoo.com>
To: "Chairman@nepra.org.pk" <Chairman@nepra.org.pk>, "cad@nepra.org.pk" <cad@nepra.org.pk>, "Registrar@nepra.org.pk" <Registrar@nepra.org.pk>

Dear Sir/Madam,

I am writing this mail with severe concern that we have spent all of our savings to install solar system at home to cope with the situation of heavy electricity bills. If the govt implements new policy of net billing instead of net metering, all of our spent money will go waste.

we reject this proposal and policy. We strongly condemn this policy and recommend to reconsider it otherwise we will protest for our rights.

Regards

Yahoo Mail: Search, organise, conquer [1]

Links:



https://mail.onelink.me/107872968?pid=nativeplacement&c=US_Acquisition_YMktg_315_SearchOrgConquer_EmailSignature&af_sub1=Acquisition&af_sub2=US_YMktg&af_sub3=&af_sub4=100002039&af_sub5=C01_Email_Static_&af_ios_store_cpp=0c38e4b0-a27e-40f9-a211-f4e2de32ab91&af_android_url=https://play.google.com/store/apps/details?id=com.yahoo.mobile.client.android.mail&listing=search_organize_conquer

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:03 PM
To: Shahid Farooque
Subject: Fwd: New billing policy effective 14/01/26

----- Original Message -----

Subject: Fwd: New billing policy effective 14/01/26
Date: 2025-12-29 09:41
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Fw: New billing policy effective 14/01/26
Date: 2025-12-26 15:45
From: aamir siddiqui <m2aamirsiddiqui@yahoo.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

For your information please
Regards

Yahoo Mail: Search, organise, conquer [1]

> ----- Forwarded message -----

> From: "aamir siddiqui" <m2aamirsiddiqui@yahoo.com>
> To: "Chairman@nepra.org.pk" <Chairman@nepra.org.pk>
> Cc:
> Sent: Fri, 26 Dec 2025 at 3:43 pm
> Subject: New billing policy effective 14/01/26 New billing policy i. e
> end of net metering is not acceptable, we have spent millions of rupees
> in installing solar systems and now Govt instead of purchasing our
> export on higher rates is slashing already approved rates which are
> not even compatible to what is prevalent in the other countries as
> they purchase electricity from solar consumers on higher rates whereas
> in our country it is opposite.

>
> So please re consider your decision in the best interest of your
> citizens.

>
> Regards

>
> Yahoo Mail: Search, organise, conquer [1]

Links:

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:54 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers
Date: 2025-12-26 09:54
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers
Date: 2025-12-24 14:24
From: Zulfiqar Rana - 3308 <zrana@bankalfalah.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>
Copy: "chairman@nepra.org.pk" <chairman@nepra.org.pk>

The Registrar

NEPRA

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers

Sir,

Submit my formal objections to the Draft NEPRA (Prosumer) Regulations, 2025, published via press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious and immediate financial loss to consumers who installed solar systems under an approved legal regime and with legitimate expectations of affordable electricity and regulatory certainty. Any reduction in the export value of self-generated electricity, adverse changes to settlement mechanisms, or retrospective application of new charges will deprive prosumers of the economic benefits that justified their investment and will defeat the very purpose of net-metering.

Breach of legitimate expectations and regulatory certainty

Many households and businesses invested in rooftop solar based on the existing legal and regulatory framework. Retrospective or punitive changes would amount to a breach of legitimate expectations, undermine the rule of law, and damage investor and consumer confidence in Pakistan's energy policy.

Conflict with national and international sustainability commitments

These proposed changes are inconsistent with Pakistan's stated climate and sustainability commitments, including obligations under the Paris Agreement and the United Nations Sustainable Development Goals, particularly those relating to affordable, reliable, and clean energy and climate action. Discouraging distributed renewable generation at this stage would set back national efforts to reduce emissions, improve energy security, and meet internationally-pledged targets.

Disproportionate burden on prosumers and BTPL consumers

As a consumer of BTPL, I am already adversely affected by:

- Arbitrary deduction/reduction of solar export units;
- Non-transparent charges imposed under the guise of tariff adjustments;
- "Misc. Charges" routinely added to electricity bills that do not appear in other DISCOs' billing.

In this context, the draft regulations would further aggravate the financial exploitation of solar consumers by effectively using prosumers to offset DISCO inefficiencies, losses, theft, and non-recovery for which consumers are not responsible.

This approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, consumer protection, and regulatory fairness.

Wider economic and system impacts

Discouraging rooftop solar will also harm broader public interests: it will slow job creation in the local solar industry, increase reliance on expensive centralized generation, raise overall system costs for all consumers, and reduce the resilience and flexibility that distributed generation provides to the grid. It will also undermine efforts to diversify Pakistan's energy mix and to lower peak demand pressures on the transmission and distribution network.

Transparency, accountability and procedural fairness

The draft regulations, as currently framed, lack adequate safeguards to prevent misuse of prosumer revenues to cover unrelated DISCO liabilities. There is insufficient transparency around billing adjustments, export accounting, and the methodology for any new charges.

There is also no clear, independent mechanism for auditing DISCO practices or for timely redress of consumer grievances.

Relief sought

In light of the foregoing, I respectfully request NEPRA to:

1. Reject any adverse or retrospective changes that would reduce the export value, alter settlement mechanisms, or otherwise penalize existing net-metering consumers who invested under the prior legal regime.
2. Grandfather existing prosumers under the rules and tariffs in place at the time of their interconnection, with any future changes applied only prospectively and after adequate notice and consultation.
3. Ensure prosumers are not used to subsidize DISCO losses, theft, or non-recovery. Any cost-recovery measures must be transparent, justified, and borne in a manner consistent with law and regulatory precedent.
4. Mandate transparent billing and independent audits of export accounting, meter readings, and any "miscellaneous" charges, with clear penalties for unlawful deductions or manipulations.

5. Require a public, evidence-based impact assessment and a meaningful stakeholder consultation process (including consumer groups, prosumer associations, industry representatives, and independent experts) before finalizing any changes.


6. Provide a clear grievance redressal and compensation mechanism for consumers who have suffered arbitrary deductions, illegal charges, or non-transparent billing practices, particularly BTPL consumers.

7. Align the final regulations with Pakistan's climate and energy commitments, ensuring they support, rather than hinder, the national transition to sustainable, distributed generation.

These measures will protect consumers, preserve regulatory credibility, support Pakistan's sustainability goals, and maintain a stable environment for continued private investment in clean energy.

I request that these objections be placed on record and given full and fair consideration before any finalization of the regulations. I am prepared to provide further evidence, billing examples, or testimony to support these objections if required.

Yours sincerely,

 Gulfiqar Rana

1142060023

[DHA Phase 2 Islamabad]

_"Please do not print this e-mail unless it is absolutely necessary." _ "This message (including any attachments) is confidential and may be privileged. If you have received it by mistake please notify the sender by return email and delete this message from your system. Any unauthorized use or dissemination of this message in whole or in part is strictly prohibited. Please note that emails are susceptible to change.

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 regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:53 AM
To: Shahid Farooque
Subject: Fwd: objections to draft NEPRA(Prosumer)

----- Original Message -----

Subject: Fwd: objections to draft NEPRA(Prosumer)
Date: 2025-12-26 09:53
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: objections to draft NEPRA(Prosumer)
Date: 2025-12-24 16:36
From: John Shepard <vanguard.shepard@gmail.com>
To: "registrar@nepra.org.pk" <registrar@nepra.org.pk>, "chairman@nepra.org.pk" <chairman@nepra.org.pk>, "cad@nepra.org.pk" <cad@nepra.org.pk>

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

, Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Rukhsana waqar

[BTPL rukhsana waqar /
[C-7 PROJECT 2-A PRECHS G.IQBAL/ Phase –3phase grid tied Account 0400004397019.

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:53 AM
To: Shahid Farooque
Subject: Fwd: objections to draft NEPRA(Prosumer)

----- Original Message -----

Subject: Fwd: objections to draft NEPRA(Prosumer)
Date: 2025-12-26 09:52
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: objections to draft NEPRA(Prosumer)
Date: 2025-12-24 16:36
From: John Shepard <vanguard.shepard@gmail.com>
To: "registrar@nepra.org.pk" <registrar@nepra.org.pk>, "chairman@nepra.org.pk" <chairman@nepra.org.pk>, "cad@nepra.org.pk" <cad@nepra.org.pk>

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

- Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Rukhsana waqar

[BTPL rukhsana waqar /
[Address / Phase –

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:53 AM
To: Shahid Farooque
Subject: Fwd: Net metering policy

----- Original Message -----

Subject: Fwd: Net metering policy
Date: 2025-12-26 09:52
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net metering policy
Date: 2025-12-24 19:22
From: Tahir Cheema <tcheema69@googlemail.com>
To: cad@nepra.org.pk

Dear Sir

We strongly condemn the news about net metering policy change.

I am more than sixty years old and spent hundreds of thousands of my savings on getting my solar system and net metering thinking it will save us from hefty electricity bills but unfortunately all our investment will go in drain if old solarization policy of net metering is changed.

We request your immediate attention to this serious matter sir.

Kind regards

Muhammad Tahir Javed

0300-8568790 tcheema69@gmail.com

Net metering consumer

--

 Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:52 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town Lahore Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town Lahore Consumers
Date: 2025-12-26 09:51
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>



----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town Lahore Consumers
Date: 2025-12-24 23:10
From: sadiqa nakhat <sadiqanakhat50@yahoo.com>
To: registrar@nepra.org.pk
Copy: cad@nepra.org.pk, chairman@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Dear Sir,
Assalamu Alikum

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.



The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. As a retired senior citizen, I made a compulsory saving for 5 years and installed solar system in the month of July 2025. Reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of wapda/ Bahria Town Lahore management I am already adversely affected by:

- 1) Arbitrary deduction/reduction of solar export units
- 2) Illegal charges imposed under the guise of tariff adjustments, and
- 3) "Misc. Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

I am also an active taxpayer even after a retirement of 9 years and I have yet to reap any fruits of my dutifulness and loyalty towards my country.

In this background, the proposed draft regulations will further aggravate the financial exploitation of many solar consumers from different financial backgrounds, such as me, who is the sole breadwinner of my household through my pension only. The proposed agenda aims to use prosumers to reduce inefficiencies, losses, theft, and poor revenue recovery by distribution companies, which would otherwise negatively affect us, the consumers.


Such an approach is UNJUST, DISCRIMINATORY, and contrary to the objectives of renewable energy promotion, regulatory system, certainty of economic use and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices.
These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Sadiqa Nakhat

205 Bahria Homes, Sector E, Bahria Town, Lahore, Mohlanwal Road. 53720.
WhatsApp: 03303110044.

--
 Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:49 AM
To: Shahid Farooque
Subject: Fwd: Subject. Solar net metering policy.

----- Original Message -----

Subject: Fwd: Subject. Solar net metering policy.
Date: 2025-12-26 09:48
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Subject. Solar net metering policy.
Date: 2025-12-25 10:42
From: muhammad Ibrahim <muhammadibrahim502@gmail.com>
To: Chairman@nepra.org.pk
Copy: registrar@nepra.org.pk

Respected sir.

There is no announcement by the government of Pakistan as yet, however, social media is full of stories regarding changes in the net metering policy. Please consider the following suggestions:- 1. Net metering for the existing users at least must continue for their seven years contract in line with the provisions of the agreement.

2. Gross metering or net billing policy being considered for new users should give at least Rs.27/- per export units. However, other limitations like installation of solar system as per the sanctioned load and separate working of import/export units bill etc may be implemented. The exported units tariff Rs.27/- and imported units as per normal rates of DISCOs during peak and off peak hours.

3. The sanctioned load @ 1.5% may also continue in selected areas as per feasibility to be determined by the DISCOs. It will be beneficial both for the consumers and the DISCOs.

4. The existing users must be paid their dues pending since installation of the solar system.

Submitted for favourable considerations and inclusion in the proposed policy.

Best Regards
Muhammad Ibrahim
Lahore
03078635671

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:48 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers
Date: 2025-12-26 09:45
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers
Date: 2025-12-25 11:22
From: Jibran Ijaz <jibranijaz46@icloud.com>
To: cad@nepra.org.pk

The Registrar
(NEPRA)
Islamabad
Subject:

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

- Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[Name]

[BTPL_consumer /
[house no 135 phase 1 agrics town raiwind road lahore.

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:48 AM
To: Shahid Farooque
Subject: Fwd: Exemption from new NAPRA policy of net metering.

----- Original Message -----

Subject: Fwd: Exemption from new NAPRA policy of net metering.
Date: 2025-12-26 09:43
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Exemption from new NAPRA policy of net metering.
Date: 2025-12-25 13:15
From: Mohammad Sadiq <msadiqhamid.53@gmail.com>
To: cad@nepra.org.pk

Please exempt old net meter subscribers from this new policy.
Thanks.

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:47 AM
To: Shahid Farooque
Subject: Fwd: Solar policy

----- Original Message -----

Subject: Fwd: Solar policy
Date: 2025-12-26 09:43
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Solar policy
Date: 2025-12-25 14:40
From: Muhammad Aslam <javed17779@gmail.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Dear sir,

I understand that NEPRA is going to formulate new regulations for Solar Energy. I am a retired person and know it very well that through out the world the governments encourage solar energy since it's a climate friendly energy. It's the cheapest form of energy. That's why the governments in foreign countries give incentives to the people who produce electricity through solar panels since other forms of energy are expensive & not climate friendly.

It is therefore requested not to approve any regulations which discourage solar power. Excess electricity produced by solar panels should be diverted to industrial sectors so that their cost of export items is reduced.

Abolishing Netmetering System & reducing buy back price would discourage the solar sector.

Hopefully NEPRA would consider my suggestion favour ably before reaching any final decision.

Regards,

Major Muhammad Aslam Javed Retd

House 22 Lane 7 street 9 Sector B

DHA 2, Islamabad

Phone 03009540337

Sent from Outlook for Android [1]

Links:

[1] <https://aka.ms/AAb9ysg>

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:46 AM
To: Shahid Farooque
Subject: Fwd: Solar users

----- Original Message -----

Subject: Fwd: Solar users
Date: 2025-12-26 09:38
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Solar users
Date: 2025-12-25 18:50
From: J Aziz <azizjavedd@gmail.com>
To: Chairman@nepra.org.pk
Copy: registrar@nepra.org.pk, cad@nepra.org.pk

Dear Sir,

Assalamu alaikum,

I am writing to respectfully request that you consider grandfathering the old rates for existing users who invested in solar setups during the previous tariff structure. Many of us made significant investments based on the rates prevalent at the time, and a change in rates would cause financial hardship.

I would be grateful if you could exempt old users from the new rates and allow them to continue under the old tariff.

Thank you for your understanding and support.

Best regards,
Javed Aziz

Address: 84-B, Khyaban Muslim ,Phase 6,DHA, Karachi

Sent from my iPhone

--
Regards

Lashkar Khan Qambrani

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:45 AM
To: Shahid Farooque
Subject: Fwd: Net Metering Policy

----- Original Message -----

Subject: Fwd: Net Metering Policy
Date: 2025-12-26 09:37
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net Metering Policy
Date: 2025-12-25 19:08
From: Tariq Malik <tariqmalikzzz7579@gmail.com>
To: cad@nepra.org.pk

The latest net-metering policy drafted by NEPRA under the Prosumer Regulations, 2025 represents a troubling retreat from meaningful support for rooftop solar adopters. This is not at all acceptable as the already over burden tax payers will further be suppressed by the implementation of this non favorable policy.... we condemn this.

--


Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:57 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Adverse Impact on Existing and Future Prosumers, Including K-Electric Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Adverse Impact on Existing and Future Prosumers, Including K-Electric Consumers
Date: 2025-12-26 10:04
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Adverse Impact on Existing and Future Prosumers, Including K-Electric Consumers
Date: 2025-12-24 10:09
From: umair naqvi <umair_naqvi@yahoo.com>
To: Registrar@nepra.org.pk
Copy: Chairman@nepra.org.pk, cad@nepra.org.pk

Sir,

I respectfully submit my objections to the Draft National Electric Power Regulatory Authority (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's official website for public consultation.

1. Violation of Legitimate Expectation and Regulatory Certainty

 Consumers installed rooftop solar systems under the NEPRA Net Metering Regulations, 2015, relying on a clear and lawful regulatory framework.

The proposed shift from net metering to net billing, particularly the reduction of export compensation to the national average energy purchase price, fundamentally alters the economic assumptions under which these investments were made.

This undermines regulatory certainty and violates the principle of legitimate expectation.

2. Retrospective and Adverse Financial Impact

Although the draft regulations suggest continuation of existing agreements until expiry, the proposed billing methodology materially reduces the value of self-generated electricity. Such changes amount to an indirect retrospective financial impact on existing consumers who invested in good faith.

3. Adverse Impact on K-Electric Consumers

As a K-Electric consumer, I am already subject to frequent tariff adjustments and cost pass-through mechanisms approved by NEPRA. The proposed Prosumer Regulations will impose an additional and disproportionate financial burden on solar consumers without addressing underlying issues such as system losses, theft, and recovery inefficiencies.

This approach unfairly penalizes compliant consumers while providing no structural solution to sector inefficiencies.

4. Unjust Transfer of Distribution System Inefficiencies

The draft regulations effectively shift the burden of inefficiencies within the power distribution system onto prosumers. Consumers who invest in distributed generation should not be required to subsidize losses, theft, or non-recovery through reduced compensation for clean energy exports.

5. Conflict with Renewable Energy and Energy Security Objectives

Distributed renewable generation has played a critical role in reducing grid stress, fuel imports, and consumer costs. The proposed regulations weaken the economic viability of rooftop solar and send a negative signal to households and businesses considering investment in clean energy.

6. Requests and Relief Sought

I respectfully request NEPRA to:

- * Avoid any adverse or retrospective economic impact on existing net-metering consumers
- * Fully protect existing agreements for their entire term, both contractually and economically
- * Ensure that prosumers are not used to offset distribution losses and inefficiencies
- * Maintain a fair and economically viable export compensation mechanism
- * Reassess the proposed net-billing framework in light of consumer protection and renewable energy objectives

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Name: Umair Naqvi

Consumer: K-Electric

Consumer No: 400003555807

Contact: 03005338393

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:57 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on KE Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on KE Consumers
Date: 2025-12-26 10:02
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on KE Consumers
Date: 2025-12-24 10:17
From: Abdullah Hassan Syed <syedabdullahhassan70@gmail.com>
To: cad@nepra.org.pk, registrar@nepra.org.pk, chairman@nepra.org.pk

The Registrar
NEPRA
Islamabad

Respected Sir,

I submit my formal objections to the Draft NEPRA (Prosumer) Regulations, 2025, published via press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious and immediate financial loss to consumers who installed solar systems under an approved legal regime and with legitimate expectations of affordable electricity and regulatory certainty. Any reduction in the export value of self-generated electricity, adverse changes to settlement mechanisms, or retrospective application of new charges will deprive prosumers of the economic benefits that justified their investment and will defeat the very purpose of net-metering.

Breach of legitimate expectations and regulatory certainty

Many households and businesses invested in rooftop solar based on the existing legal and regulatory framework. Retrospective or punitive changes would amount to a breach of legitimate expectations, undermine the rule of law, and damage investor and consumer confidence in Pakistan's energy policy.

Conflict with national and international sustainability commitments

These proposed changes are inconsistent with Pakistan's stated climate and sustainability commitments, including obligations under the Paris Agreement and the United Nations Sustainable Development Goals, particularly those relating to affordable, reliable, and clean energy and climate action. Discouraging distributed renewable generation at

- this stage would set back national efforts to reduce emissions, improve energy security, and meet internationally-pledged targets.

Disproportionate burden on prosumers and KE consumers

As a consumer of KE, I am already adversely affected by:

- Arbitrary deduction/reduction of solar export units;
- Non-transparent charges imposed under tariff adjustments;
- “Misc. Charges” routinely added to electricity bills.

In this context, the draft regulations would further aggravate the financial exploitation of solar consumers by effectively using prosumers to offset DISCO inefficiencies, losses, theft, and non-recovery for which consumers are not responsible. This approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, consumer protection, and regulatory fairness.

Wider economic and system impacts

Discouraging rooftop solar will also harm broader public interests: it will slow job creation in the local solar industry, increase reliance on expensive centralized generation, raise overall system costs for all consumers, and reduce the resilience and flexibility that distributed generation provides to the grid. It will also undermine efforts to diversify Pakistan’s energy mix and to lower peak demand pressures on the transmission and distribution network.

Transparency, accountability and procedural fairness

The draft regulations, as currently framed, lack adequate safeguards to prevent misuse of prosumer revenues to cover unrelated DISCO liabilities. There is insufficient transparency around billing adjustments, export accounting, and the methodology for any new charges.

There is also no clear, independent mechanism for auditing DISCO practices or for timely redress of consumer grievances.

Relief sought

In light of the foregoing, I respectfully request NEPRA to:

1. Reject any adverse or retrospective changes that would reduce the export value, alter settlement mechanisms, or otherwise penalize existing net-metering consumers who invested under the prior legal regime.

2. Grandfather existing prosumers under the rules and tariffs in place at the time of their interconnection, with any future changes applied only prospectively and after adequate notice and consultation.

3. Ensure prosumers are not used to subsidize DISCO losses, theft, or non-recovery. Any cost-recovery measures must be transparent, justified, and borne in a manner consistent with law and regulatory precedent.

4. Mandate transparent billing and independent audits of export accounting, meter readings, and any “miscellaneous” charges, with clear penalties for unlawful deductions or manipulations.

5. Require a public, evidence-based impact assessment and a meaningful stakeholder consultation process (including consumer groups, prosumer associations, industry representatives, and independent experts) before finalizing any changes.

6. Provide a clear grievance redressal and compensation mechanism for consumers who have suffered arbitrary deductions, forcibly imposed charges.

7. Align the final regulations with Pakistan's climate and energy commitments, ensuring they support, rather than hinder, the national transition to sustainable, distributed generation.

These measures will protect consumers, preserve regulatory credibility, support Pakistan's sustainability goals, and maintain a stable environment for continued private investment in clean energy.

I humbly request you that these objections be placed on record and given full and fair consideration before any finalization of the regulations.

Yours sincerely,

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:57 AM
To: Shahid Farooque
Subject: Fwd: Injustice with Solar users

----- Original Message -----

Subject: Fwd: Injustice with Solar users
Date: 2025-12-26 10:02
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Injustice with Solar users
Date: 2025-12-24 10:17
From: Haroon Rashid <roonrashid@icloud.com>
To: cad@nepra.org.pk

Your new policy has been taken by the general public as brutal action.
Please rationalise it and put the burden on decision makers indulged in imposing unnatural capacity charges on us.....
Sent from my iPhone

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:56 AM
To: Shahid Farooque
Subject: Fwd: Solar Net Metering Policy

----- Original Message -----

Subject: Fwd: Solar Net Metering Policy
Date: 2025-12-26 09:59
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Solar Net Metering Policy
Date: 2025-12-24 10:35
From: Zahid Iqbal <zahidiqbalmbl@gmail.com>
To: cad@nepra.org.pk
Copy: registrar@nepra.org.pk, chairman@nepra.org.pk

Dear Sir,

I strongly oppose the proposed net metering policy which will adversely affect the present solar users. They have made the investment to ease their electricity cost n support the country in managing energy crisis.

Thks

Zahid Iqbal
0336 5466181

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:56 AM
To: Shahid Farooque
Subject: Fwd: Net Metering

----- Original Message -----

Subject: Fwd: Net Metering
Date: 2025-12-26 09:59
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----


Subject: Net Metering
Date: 2025-12-24 10:54
From: Mansoor Saeed <mansoor.saeed217@gmail.com>
To: cad@nepra.org.pk

End of net metering for existing customers will be highly unjust. People will loose confidence in the govt policies. How can NEPRA allow power companies to recover their inefficiencies from the consumers. As Chairman NEPRA you have the official and moral duty to protect the interest of consumers, any act of your's contrary to the interest of the consumer will amount to breach of your official duty.

Regards.

Mansoor.Saeed.

--
Regards

 Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:55 AM
To: Shahid Farooque
Subject: Fwd: NEPRA new policy

----- Original Message -----

Subject: Fwd: NEPRA new policy
Date: 2025-12-26 09:59
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: NEPRA new policy
Date: 2025-12-24 11:05
From: Almas Abbasi <almasabbasi1963@gmail.com>
To: cad@nepra.org.pk

As by knowing from news in social media that NAPRA is going to finish its policy of net metring and going to start new policy of net billing.
By this new advanture it will create a bad image for its consumers who have invested a huge investments on installation of systems at their residences. If government has to start a policy for the benefit of its citizens that at least time period should also be notified. Solar panels were incurged for increasing the electricity demand in the country to finish the load shedding in the country. But now the Government is discouraging it's citizens by changing its policy in very short time. If it is necessary to change its policy of net metring it should be for new consumer not for old consumer who have invested a huge amount of money in installation of solar panels.

(Mohammad Almas Abbasi)

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:55 AM
To: Shahid Farooque
Subject: Fwd: Serious Concern & Objection to Proposed Net Billing Policy – Request Protection for Existing Net Metering Consumers

----- Original Message -----


Subject: Fwd: Serious Concern & Objection to Proposed Net Billing Policy – Request Protection for Existing Net Metering Consumers

Date: 2025-12-26 09:58

From: cad@nepra.org.pk

To: Zabihullah <zabihullah@nepra.org.pk>

Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Serious Concern & Objection to Proposed Net Billing Policy – Request Protection for Existing Net Metering Consumers

Date: 2025-12-24 11:17

From: Noman Mehmood <noumanmajestic@gmail.com>

To: chairman@nepra.org.pk


Copy: cad@nepra.org.pk, Registrar@nepra.org.pk

Respected Chairman NEPRA,

I am writing to express my serious concern and strong objection regarding the proposed Net Billing Policy, which effectively ends Net Metering and is planned to be implemented from 14 January 2026.

I am an existing net-metering consumer who invested a substantial amount of personal savings in installing a solar system under the prevailing NEPRA Net Metering policy. This investment was made in good faith, based on long-term policy assurances and financial viability.

At a time when Pakistan was facing severe electricity shortages, rising fuel costs, and load-shedding, we solar consumers supported the national grid by producing clean electricity at our own expense. We reduced burden on the grid, saved foreign exchange, and contributed to energy stability during difficult times.

The proposed policy change will:

Destroy the financial viability of our investments Undermine investor confidence in government policies Penalize responsible citizens who adopted renewable energy Cause financial losses to households who planned based on existing rules Changing the policy retrospectively for existing net-metering users is unjust and unfair. We have already invested, signed agreements, and designed our systems according to the current framework.

I humbly request NEPRA to:

Exempt existing net-metering consumers from the new Net Billing policy Protect already installed systems under the original net-metering terms Apply any new policy only to future consumers, not retrospectively We helped the country during bad times. It is deeply disappointing that now we are being asked to sacrifice our lawful investments.

I sincerely urge NEPRA to reconsider this policy and safeguard the rights of existing net-metering consumers in the interest of fairness, trust, and sustainable energy development.

Yours sincerely,

Nouman Majestic

Concerned Net Metering Consumer

Pakistan

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:55 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025
Date: 2025-12-26 09:58
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025
Date: 2025-12-24 11:45
From: Mairaj Warsi <mairaj.warsi@gmail.com>
To: registrar@nepra.org.pk, cad@nepra.org.pk, chairman@nepra.org.pk
Copy: Mairaj Warsi <mairaj.warsi@gmail.com>

The Registrar
National Electric Power Regulatory Authority (NEPRA) Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025

Sir,

I respectfully submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's official website.

The proposed amendments to the existing net-metering/prosumer framework will result in substantial financial loss to solar consumers who installed their systems under a duly approved legal regime, with a legitimate expectation of affordable, reliable, and predictable electricity costs. Any reduction in export value or adverse alteration in settlement mechanisms will deprive consumers of the benefit of cheaper self-generated electricity and undermine the very objective of the net-metering policy.

The proposed draft regulations will further aggravate the financial exploitation of solar consumers by effectively using prosumers as a means to offset inefficiencies, technical losses, electricity theft, and non-recovery of dues by distribution companies—matters for which consumers bear no responsibility.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, consumer protection, and Pakistan's long-term energy sustainability goals.

In view of the above, I respectfully request NEPRA to:

- * Reject any adverse, unilateral, or retrospective changes affecting existing net-metering consumers;
- * Ensure that prosumers are not penalized to compensate for DISCO/utility losses or electricity theft; and

* Protect solar consumers from arbitrary deductions,

These objections may kindly be placed on record and given due consideration before finalization of the proposed regulations.

Yours sincerely,

Mairaj Warsi


IESCO Consumer # 1141934760

[1]

Virus-free.www.avast.com [1]

Links:

[1]

 https://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-mail&utm_content=webmail

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:55 AM
To: Shahid Farooque
Subject: Fwd: Termination of Net Metering Policy

----- Original Message -----

Subject: Fwd: Termination of Net Metering Policy
Date: 2025-12-26 09:56
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Termination of Net Metering Policy
Date: 2025-12-24 13:05
From: shahid ansar <shahid.ansar@gmail.com>
To: cad@nepra.org.pk
Copy: registrar@nepra.org.pk, chairman@nepra.org.pk

Dear sir,

This refers to news appearing in social media on replacement of Net Metering Policy by Net billing Policy. I am very disappointed and strongly protest on termination of Net Metering Policy. I have invested based on Net Metering Policy as electricity rates are getting expensive and unaffordable. These type of decisions suggest that previous policy was not well thought and cast doubt on seriousness on part of the regulator. Foregoing above, I strongly request to continue Net Metering Policy for old consumers and renew contract in future as well,

Regards
Syed Shahid Ansar
H-9, St 5, Sector A, DHA-, Islamabad
300-8567616.

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:49 AM
To: Shahid Farooque
Subject: Fwd: Net Metering

----- Original Message -----

Subject: Fwd: Net Metering
Date: 2025-12-26 09:48
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net Metering
Date: 2025-12-25 10:30
From: Chaudhry Shahid Nazir <colshahid@icloud.com>
To: cad@nepra.org.pk

Dear Sir ! This issue can only be solved by equating net metering rates with that of IPP rates. Even installed capacity payment should be given to net metering users too. This will give nation wide universal data. The govt then should call a unilateral rate for IPPs and net metering users. Capacity payment if not given to net metering users should not be given to IPPs. Rates given to net metering users should be given to IPPs and whole country's capacity payment, circular debt and power rates will be come affordable. Differentiating IPPs and Net-metering is the causing the two slabs. It's just the net metering is a mini IPP. Balance both and country is rescued.

Sent from my iPhone

 Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:49 AM
To: Shahid Farooque
Subject: Fwd: Net billing vs net metering

----- Original Message -----

Subject: Fwd: Net billing vs net metering
Date: 2025-12-26 09:49
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net billing vs net metering
Date: 2025-12-25 09:30
From: Mir Anwar Shahzad <shahzad.anwar77@gmail.com>
To: cad@nepra.org.pk
Copy: Chairman@nepra.org.pk, registrar@nepra.org.ok

Respected Sir,

This is all over the social media that NEPRA is ready to launch new Net Billing Policy (end of Net Metering) with effect from 14 Jan 26. New policy will be applicable to both new and old licensees, except the purchase rate which will be Rs. 27 for old users and Rs. 11.5 for new users. New policy has been posted at NEPRA website.

First please confirm either the above information is true and authentic.

Secondly I would humbly suggest that at least exempt old Net metering users from this policy till the end of their respective agreement dates.

Because implementation of such policies have multi folds impact on the users, society and the industry.

There was a time that government was encouraging or and was giving incentives to general public to shift towards the alternative energy.

Now since we have shifted we are gonna penalized in ine way or the other.

Many like me have installed the solar energy systems on loans or on installments. How will we survive if we have to pay installments and electricity bills, under new policy, in parallel?

You are once again requested to reconsider the policy and to exempt existing net metering user from this new policy till the end of their respective agreements.

Regards
Mir Anwar Shahzad

--
Regards

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:54 AM
To: Shahid Farooque
Subject: Fwd: Net metering

----- Original Message -----

Subject: Fwd: Net metering
Date: 2025-12-26 09:56
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net metering
Date: 2025-12-24 13:05
From: Faridullah Khan <faridsahib@me.com>
To: cad@nepra.org.pk

We the current users strongly condemn the unilateral change of policy by the inefficient utilities. We demand as filers a proper deliberation in the parliament pending NEPRAs.

Faridullah khan
Former federal secretary
GoP.
I

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:54 AM
To: Shahid Farooque
Subject: Fwd: New Net Metering and Billing Policy

----- Original Message -----

Subject: Fwd: New Net Metering and Billing Policy
Date: 2025-12-26 09:56
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: New Net Metering and Billing Policy
Date: 2025-12-24 13:24
From: Javed Iqbal Malik <jimalik46@gmail.com>
To: Chairman@nepra.org.pk
Copy: cad@nepra.org.pk, registrar@nepra.org.pk

Dear Sir,

It is being heard that NEPRA is ready to launch a new Net Billing Policy (end of Net Metering) with effect from 14 Jan 26. Reportedly, new policy will be applicable to both new and old licensees, except the purchase rate which will be Rs.27 for old users and Rs.11.5 for new users..

It is highly unjustified to first lure the citizens to install solar system, when people have installed these systems they are subjected to very harsh conditions. This unjustified policy is being launched, when entire world is encouraging the green energy and Pakistan is discouraging the same. It seems that this policy is being aiming at screwing the poor masses like fixed electricity/gas charges and petrol prices.

You are requested to please review this policy and instead give relief to the people by lowering the electricity tariffs.

Best regards

Col Javed Iqbal (Retd)

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:54 AM
To: Shahid Farooque
Subject: Fwd: Concern and Objection Regarding Proposed Net Billing Policy

----- Original Message -----

Subject: Fwd: Concern and Objection Regarding Proposed Net Billing Policy
Date: 2025-12-26 09:55
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Concern and Objection Regarding Proposed Net Billing Policy
Date: 2025-12-24 14:12
From: Umar Sajjad <umar.sajjad8@gmail.com>
To: registrar@nepra.org.pk, cad@nepra.org.pk, chairman@nepra.org.pk

Dear Sir,

I hope this email finds you well.

I am writing as a concerned citizen and a solar net-metering user to share my serious concerns regarding the Draft Prosumer Regulations 2025 and the proposed shift from Net Metering to the new Net Billing Policy, as advertised on 12 December 2025.

Like many others, I invested in a solar system after carefully considering the existing net-metering regulations and the assurances provided by the regulatory framework at that time. These systems require significant upfront investment, and the decision was made in good faith with the understanding that the rules would remain stable. Applying a new policy to existing users feels unfair and deeply discouraging.

My main concerns are:

1- Retrospective impact on existing users:

Changing the rules after people have already invested puts an unexpected financial burden on households and small businesses who were simply trying to reduce their electricity costs and support clean energy.

2-Very low buyback rates: The proposed rates, especially for new users, make solar generation economically unattractive and do not reflect the actual value that distributed solar brings to the grid.

3-Limited public consultation: Many affected users feel they did not get a meaningful opportunity to be heard before such a major change was proposed.

This policy, if implemented as proposed, risks slowing down solar adoption at a time when Pakistan needs affordable energy, energy independence, and environmental sustainability more than ever.

I sincerely request NEPRA to please reconsider this approach. At the very least, existing net-metering consumers should be fully protected and exempted from any new policy changes. A broader and more transparent consultation with stakeholders would also help build trust and lead to better outcomes for everyone.

Thank you for taking the time to read this email. I hope NEPRA will carefully consider the concerns of ordinary consumers before finalizing this policy.

Kind regards,
Sajjad Hussain

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:01 PM
To: Shahid Farooque
Subject: Fwd: Draft NEPRA (Consumers) Regulations,2025 - Adverse impact on BTPL consumers

----- Original Message -----

Subject: Fwd: Draft NEPRA (Consumers) Regulations,2025 - Adverse impact on BTPL consumers
Date: 2025-12-29 09:34
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Draft NEPRA (Consumers) Regulations,2025 - Adverse impact on BTPL consumers
Date: 2025-12-27 16:47
From: Qader Bakhsh <qaderbakhsh@yahoo.com>
To: <cad@nepra.org.pk>
Copy: <Chairman@nepra.org.pk>

The Registrar
(NEPRA)

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

- These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Qader Bakhsh
House No.241/2, 32nd Street
Khayaban e Qasim
Phase 8
DHA Karachi
Cell number: 03218922617

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:00 PM
To: Shahid Farooque
Subject: Fwd: Net billing not accepted.

----- Original Message -----

Subject: Fwd: Net billing not accepted.
Date: 2025-12-29 09:32
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net billing not accepted.
Date: 2025-12-27 21:10
From: Yasmeen Raees <yasraees21@gmail.com>
To: cad@nepra.org.pk, registrar@nepra.org.pk, chairman@nepra.org.pk

It is requested kindly not to apply net billing mechanism it is completely unjustifiable.

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:00 PM
To: Shahid Farooque
Subject: Fwd: Net metering conversation into net billing.

----- Original Message -----

Subject: Fwd: Net metering conversation into net billing.
Date: 2025-12-29 09:29
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net metering conversation into net billing.
Date: 2025-12-28 15:52
From: Hanif Adil <hanif.adil112@gmail.com>
To: cad@nepra.org.pk
Copy: Chairman@nepra.org.pk

We have gone through your website proposing some changes in net metering policy.

Please clarify that only tariff has been reduced from 27 to 22 and remaining policy for offsetting the unit will remain unchanged.

It is unfair to reduce the tariff for export units from Rs.27 to 22.

If policy for offsetting the units is also being changed it will be again unjustified and against the public interest.

It will be heading shake of the confidence over govt.

Please clarify the position.

M.hanif Adil
93078799511

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:00 PM
To: Shahid Farooque
Subject: Fwd: New policy

----- Original Message -----

Subject: Fwd: New policy
Date: 2025-12-29 09:28
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: New policy
Date: 2025-12-28 21:55
From: ZAMIR NAYYAR <zamirnayyar@gmail.com>
To: cad@nepra.org.pk

I would request you to reconsider the new policy It is totally unjustified and unacceptable

Sent from my iPhone

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:59 AM
To: Shahid Farooque
Subject: Fwd: Urgent Attention on New net metering policy

----- Original Message -----

Subject: Fwd: Urgent Attention on New net metering policy
Date: 2025-12-29 09:26
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Urgent Attention on New net metering policy
Date: 2025-12-29 08:13
From: Montaha Afzaal <montahafzaal@gmail.com>
To: cad@nepra.org.pk

People opted solar energy to avoid higher monthly bills and spent lots of money to install it. Now this type of policy is a great injustice and not acceptable.

Kindly give immediate attention to this matter for the public welfare.

Thanks

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:59 AM
To: Shahid Farooque
Subject: Fwd: new policy of nepra- Rejected

----- Original Message -----

Subject: Fwd: new policy of nepra- Rejected
Date: 2025-12-26 14:39
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: new policy of nepra- Rejected
Date: 2025-12-26 10:46
From: Azhar Shami <anshami@yahoo.com>
To: cad@nepra.org.pk

it will be very very expensive n burden on consumer.
we reject it, as the prevailing condition are already severe.

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:59 AM
To: Shahid Farooque
Subject: Fwd: Please don't revise the old policy as it will cause a lot of problem to us

----- Original Message -----

Subject: Fwd: Please don't revise the old policy as it will cause a lot of problem to us
Date: 2025-12-26 14:38
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Please don't revise the old policy as it will cause a lot of problem to us
Date: 2025-12-26 11:10
From: Afshan Hashmi <iffy716@gmail.com>
To: cad@nepra.org.pk

We want the old policy back

Sent from my iPad

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:59 AM
To: Shahid Farooque
Subject: Fwd: Solar System

----- Original Message -----

Subject: Fwd: Solar System
Date: 2025-12-26 14:36
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Solar System
Date: 2025-12-26 12:17
From: Saleem Shahid <engrmsshahid@gmail.com>
To: cad@nepra.org.pk

Solar power is clean renewable energy source The incentive given to consumers is a positive policy Please protect the original policy The consumers will shift to off grid system That will cause more stress to the national grid system Please make a proper planning regarding tariff to IPPs Giving them high rates is punishment to the normal consumers Please ensure a policy which serves the ordinary consumers/citizens and not the exploiting companies and wealthy families
Thanks M Saleem Shahid Ex Chief Engineer/DG PAEC

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA





Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:58 AM
To: Shahid Farooque
Subject: Fwd: New Net Billing Policy 2026

----- Original Message -----


Subject: Fwd: New Net Billing Policy 2026
Date: 2025-12-26 10:07
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: New Net Billing Policy 2026
Date: 2025-12-26 09:53
From: Razi Raziuddin <razienergyco@gmail.com>
To: cad@nepra.org.pk
Copy: Razi Raziuddin <RaziEnergyco@gmail.com>

There may not be any discrimination between the present and new licencees. Purchase rate of Rs 27 per unit is very high and destroyed the power system of Pakistan. Many countries gave an incentive and then withdrew after 7 to 10 years. The Purchase rate should be no more than Hydel and Wind Average or less than Rs 7 per unit. Solar at roof top is not an individual business. FBR may levy income tax on the windfall profit made by solar power suppliers.

Kind regards,
Sincerely,

Raziuddin (Razi)
03005001038
razienergyco@gmail.com

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:58 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Serious Adverse Impact on IESCO Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Serious Adverse Impact on IESCO Consumers
Date: 2025-12-26 10:06
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Serious Adverse Impact on IESCO Consumers
Date: 2025-12-24 09:39
From: Waqas Asif <waqas.asif@gmail.com>
To: registrar@nepra.org.pk
Copy: cad@nepra.org.pk

Sir,

I am writing to formally submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, as published on 12 December 2025.

As an IESCO consumer who invested in solar energy under the existing legal framework, the proposed regulations represent a breach of "legitimate expectation." The changes threaten the financial viability of my investment and undermine the transition toward clean energy in Pakistan.

Specifically, I object to the draft based on the following concerns:

*

Financial Injustice: The proposed reduction in the export value of units (shifting from a 1:1 unit offset to a lower monetary credit) will significantly extend the payback period of solar systems, making them unaffordable for the middle class.

*

Retrospective Application: Any changes applied to existing net-metering license holders are legally and morally questionable. Consumers made heavy investments based on the regulatory certainty provided by the 2015 Regulations.

*

Subsidizing Inefficiency: IESCO consumers should not be penalized to cover the systemic inefficiencies, line losses, and electricity theft within the distribution network. Prosumers are part of the solution to the energy crisis, yet these regulations treat them as a financial burden.

*

Impact on Renewable Goals: At a time when the government is pushing for a "Green Pakistan," these regulations create a massive deterrent for future solar adoption, ensuring a continued reliance on expensive, imported fossil fuels.

I respectfully request NEPRA to:

*

Reject any retrospective changes for existing IESCO net-metering consumers; their terms should be "grandfathered" for the duration of their licenses.

*

Maintain the 1:1 netting mechanism to ensure consumers receive the full benefit of the electricity they contribute to the national grid.

*

Ensure transparency in how "fixed charges" or "grid sharing charges" are calculated, preventing IESCO from imposing arbitrary costs on solar users.

These objections are submitted for the record, and I request that they be given due consideration before any regulations are finalized.

Yours sincerely,

Waqas Asif

IESCO Consumer Number: 114083424

Address: Service Road East, B-1 Block, B-17, Islamabad

Date: December 24, 2025

--

Regards

Lashkar Khan Qambrani

Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:58 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers
Date: 2025-12-26 10:06
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers
Date: 2025-12-24 09:43
From: Jahanzeb Khan <jahanzeb.khan36@gmail.com>
To: cad@nepra.org.pk

The Registrar

24-Dec-2025

NEPRA

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 --
Additional Adverse Impact on BTPL Consumers

Dear Sir;

I submit my formal objections to the Draft NEPRA (Prosumer) Regulations, 2025, published via press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious and immediate financial loss to consumers like me who installed solar systems during 2022 under an approved legal regime and with legitimate expectations of affordable electricity and regulatory certainty. Any reduction in the export value of self-generated electricity, adverse changes to settlement mechanisms, or retrospective application of new charges will deprive me of the economic benefits that justified their investment and will defeat the very purpose of net-metering.

Breach of legitimate expectations and regulatory certainty

Many households and businesses invested in rooftop solar based on the existing legal and regulatory framework. Retrospective or punitive changes would amount to a breach of legitimate expectations, undermine the rule of law, and damage investor and consumer confidence in Pakistan's energy policy.

Conflict with national and international sustainability commitments

These proposed changes are inconsistent with Pakistan's stated climate and sustainability commitments, including obligations under the Paris Agreement and the United Nations Sustainable Development Goals, particularly those relating to affordable, reliable, and clean energy and climate action. Discouraging distributed renewable generation at this stage would set back national efforts to reduce emissions, improve energy security, and meet internationally-pledged targets.

Disproportionate burden on prosumers and BTPL consumers

As a consumer of BTPL, I am already adversely affected by:

- Arbitrary deduction/reduction of solar export units;
- Non-transparent charges imposed under the guise of tariff adjustments;
- "Misc. Charges" routinely added to electricity bills.

In this context, the draft regulations would further aggravate the financial exploitation of solar consumers by effectively obliging prosumers to offset KE/DISCO inefficiencies, losses, theft, and non-recovery for which consumers are not responsible. This approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, consumer protection, and regulatory fairness.

Wider economic and system impacts

Discouraging rooftop solar will also harm broader public interests: it will slow job creation in the local solar industry, increase reliance on expensive centralized generation, raise overall system costs for all consumers, and reduce the resilience and flexibility that distributed generation provides to the grid. It will also undermine efforts to diversify Pakistan's energy mix and to lower peak demand pressures on the transmission and distribution network.

Transparency, accountability and procedural fairness

The draft regulations, as currently framed, lack adequate safeguards to prevent misuse of prosumer revenues to cover unrelated DISCO liabilities. There is insufficient transparency around billing adjustments, export accounting, and the methodology for any new charges.

There is also no clear, independent mechanism for auditing DISCO practices or for timely redress of consumer grievances.

Relief sought :


Considering the foregoing, I respectfully request NEPRA to:

1. Reject any adverse or retrospective changes that would reduce the export value, alter settlement mechanisms, or otherwise penalize existing net-metering consumers who invested under the prior legal regime.
2. Grandfather existing prosumers under the rules and tariffs in place at the time of their interconnection, with any future changes applied only prospectively and after adequate notice and consultation.
3. Ensure prosumers are not used to subsidize DISCO losses, theft, or non-recovery. Any cost-recovery measures must be transparent, justified, and borne in a manner consistent with law and regulatory precedent.

4. Mandate transparent billing and independent audits of export accounting, meter readings, and any “miscellaneous” charges, with clear penalties for unlawful deductions or manipulations.
5. Require a public, evidence-based impact assessment and a meaningful stakeholder consultation process (including consumer groups, prosumer associations, industry representatives, and independent experts) before finalizing any changes.
6. Provide a clear grievance redressal and compensation mechanism for consumers who have suffered arbitrary deductions, illegal charges, or non-transparent billing practices, particularly BTPL consumers.
7. Align the final regulations with Pakistan’s climate and energy commitments, ensuring they support, rather than hinder, the national transition to sustainable, distributed generation.

These measures will protect consumers, preserve regulatory credibility, support Pakistan’s sustainability goals, and maintain a stable environment for continued private investment in clean energy.

I request that these objections be placed on record and given full and fair consideration before any finalization of the regulations. I am prepared to provide further evidence, billing examples, or testimony to support these objections if required.

 So please acknowledge the receipt of this email.

Kind regards;

Engr. JAHAN ZEB KHAN (Net Metering Consumer of Karachi Electric)

Cell: 0301-2249583

M-10,

KDA Overseas Bungalows,

Block 16-A,

Gulistan-e-Johar,

 Karachi.

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:58 AM
To: Shahid Farooque
Subject: Fwd: Solor policy

----- Original Message -----

Subject: Fwd: Solor policy
Date: 2025-12-26 10:05
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Solor policy
Date: 2025-12-24 10:09
From: Muhammad Aslam <javed17779@gmail.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Respected sir.this policy should be implement to new solor user.we have
7 years agreement with nepra.it should be done accordingly.
Javed dha2 islamabad

Sent from Outlook for Android [1]

Links:

[1] <https://aka.ms/AAb9ysg>

--

Regards




Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:57 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers
Date: 2025-12-26 10:04
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>


 ----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers
Date: 2025-12-24 10:09
From: Waqas Ahmed <waqasahmed@parco.com.pk>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>
Copy: "registrar@nepra.org.pk" <registrar@nepra.org.pk>, "chairman@nepra.org.pk" <chairman@nepra.org.pk>

The Registrar
NEPRA
Islamabad

Sir,

I submit my formal objections to the Draft NEPRA (Prosumer) Regulations, 2025, published via press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

 The proposed changes to the net-metering/prosumer framework will cause serious and immediate financial loss to consumers who installed solar systems under an approved legal regime and with legitimate expectations of affordable electricity and regulatory certainty. Any reduction in the export value of self-generated electricity, adverse changes to settlement mechanisms, or retrospective application of new charges will deprive prosumers of the economic benefits that justified their investment and will defeat the very purpose of net-metering.

Breach of legitimate expectations and regulatory certainty

Many households and businesses invested in rooftop solar based on the existing legal and regulatory framework. Retrospective or punitive changes would amount to a breach of legitimate expectations, undermine the rule of law, and damage investor and consumer confidence in Pakistan's energy policy.

Conflict with national and international sustainability commitments

These proposed changes are inconsistent with Pakistan's stated climate and sustainability commitments, including obligations under the Paris Agreement and the United Nations Sustainable Development Goals, particularly those relating to affordable, reliable, and clean energy and climate action. Discouraging distributed renewable generation at

this stage would set back national efforts to reduce emissions, improve energy security, and meet internationally-pledged targets.

Disproportionate burden on prosumers and BTPL consumers

As a consumer of BTPL, I am already adversely affected by:

- Arbitrary deduction/reduction of solar export units;
- Non-transparent charges imposed under the guise of tariff adjustments;
- “Misc. Charges” routinely added to electricity bills that do not appear in other DISCOs’ billing.

In this context, the draft regulations would further aggravate the financial exploitation of solar consumers by effectively using prosumers to offset DISCO inefficiencies, losses, theft, and non-recovery for which consumers are not responsible. This approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, consumer protection, and regulatory fairness.

Wider economic and system impacts

Discouraging rooftop solar will also harm broader public interests: it will slow job creation in the local solar industry, increase reliance on expensive centralized generation, raise overall system costs for all consumers, and reduce the resilience and flexibility that distributed generation provides to the grid. It will also undermine efforts to diversify Pakistan’s energy mix and to lower peak demand pressures on the transmission and distribution network.

Transparency, accountability and procedural fairness

The draft regulations, as currently framed, lack adequate safeguards to prevent misuse of prosumer revenues to cover unrelated DISCO liabilities. There is insufficient transparency around billing adjustments, export accounting, and the methodology for any new charges.

There is also no clear, independent mechanism for auditing DISCO practices or for timely redress of consumer grievances.

Relief sought

In light of the foregoing, I respectfully request NEPRA to:

1. Reject any adverse or retrospective changes that would reduce the export value, alter settlement mechanisms, or otherwise penalize existing net-metering consumers who invested under the prior legal regime.
2. Grandfather existing prosumers under the rules and tariffs in place at the time of their interconnection, with any future changes applied only prospectively and after adequate notice and consultation.
3. Ensure prosumers are not used to subsidize DISCO losses, theft, or non-recovery. Any cost-recovery measures must be transparent, justified, and borne in a manner consistent with law and regulatory precedent.
4. Mandate transparent billing and independent audits of export accounting, meter readings, and any “miscellaneous” charges, with clear penalties for unlawful deductions or manipulations.
5. Require a public, evidence-based impact assessment and a meaningful stakeholder consultation process (including consumer groups, prosumer associations, industry representatives, and independent experts) before finalizing any changes.
6. Provide a clear grievance redressal and compensation mechanism for consumers who have suffered arbitrary deductions, illegal charges, or non-transparent billing practices, particularly BTPL consumers.
7. Align the final regulations with Pakistan’s climate and energy commitments, ensuring they support, rather than hinder, the national transition to sustainable, distributed generation.

These measures will protect consumers, preserve regulatory credibility, support Pakistan’s sustainability goals, and maintain a stable environment for continued private investment in clean energy.

I request that these objections be placed on record and given full and fair consideration before any finalization of the regulations. I am prepared to provide further evidence, billing examples, or testimony to support these objections if required.

Yours sincerely,
Waqas Ahmed
BTPL Consumer
Karachi

Sent from Outlook for Android [1] DISCLAIMER: This e-mail and any file transmitted with it are confidential and intended solely for the use of the addressee. If you are not the intended recipient, you are hereby advised that any dissemination, distribution or copy of this email or its attachments is strictly prohibited. If you have received this email in error, please immediately notify sender and destroy this email message and its attachments. Views and opinions contained herein are those of the author of this email and do not necessarily represent those of PARCO. WARNING: The recipient should check this email and any attachment for the presence of viruses. Although the company has taken reasonable precautions to ensure no viruses are present in this email, the company does not accept responsibility for any loss or damage arising from the use of this email or attachment. Please consider the environment before printing this email.

Links:

[1] <https://aka.ms/AAb9ysg>



Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:39 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025
Date: 2025-12-23 08:56
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025
Date: 2025-12-22 22:38
From: khurram humaiyun <khumaiyun440@yahoo.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

The Registrar

National Electric Power Regulatory Authority (NEPRA) Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers Sir, I hereby submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's official website.

The proposed amendments to the net-metering/prosumer framework will result in serious financial loss to existing solar consumers who installed solar systems under a legally approved regime, with legitimate expectations of affordable, predictable, and stable electricity costs.

Any reduction in export value or adverse modification of settlement mechanisms would deprive consumers of the benefits of self-generated electricity and defeat the fundamental objective of net-metering.

As a consumer of BTPL, I am already adversely affected by arbitrary deductions and reductions of solar export units, illegal charges imposed under the guise of tariff adjustments, and so-called "Miscellaneous Charges" routinely added to BTPL electricity bills. Notably, such charges do not appear in the billing practices of other electricity distribution

companies in Pakistan.

In this context, the proposed draft regulations will further aggravate the financial exploitation of solar consumers by effectively using prosumers to offset inefficiencies, losses, electricity theft, and non-recovery of dues by distribution companies—matters for which consumers bear no responsibility whatsoever.

Such an approach is unjust, discriminatory, and contrary to the stated objectives of renewable energy promotion, regulatory certainty, consumer protection, and public interest.

I therefore respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses, inefficiencies, or electricity theft; and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Lt Col (R) Khurram Humaiyun

BTPL Consumer

House No. 602L, Street 17

Overseas Sector-3, Phase-8

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:39 AM
To: Shahid Farooque
Subject: Fwd: Public Objections & Feedback on Draft Prosumer (Net Metering) Regulations 2025

----- Original Message -----

Subject: Fwd: Public Objections & Feedback on Draft Prosumer (Net Metering) Regulations 2025
Date: 2025-12-22 09:04
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Public Objections & Feedback on Draft Prosumer (Net Metering) Regulations 2025
Date: 2025-12-21 00:21
From: Zaheer Abbas <zaheer_thull@icloud.com>
To: registrar@nepra.org.pk
Copy: cad@nepra.org.pk, info@nepra.org.pk

Respected Sir/Madam,

I hope this email finds you well.

I am writing to submit my objections and public feedback on the Draft Prosumer (Net Metering) Regulations 2025 issued by the National Electric Power Regulatory Authority (NEPRA) for public consultation.

While I appreciate NEPRA's efforts to ensure grid stability and address challenges arising from the rapid growth of solar energy in Pakistan, I am concerned that certain proposed amendments may unintentionally discourage industrial, commercial, and responsible prosumers who have invested in renewable energy to reduce dependence on the national grid.

My key concerns and suggestions are outlined below:

1. Reduction in Buyback Rate

The proposed reduction of the buyback rate from approximately Rs. 26/unit to the National Average Energy Purchase Price (around Rs. 13/unit) is a significant cut.

Such a sharp reduction will substantially reduce the attractiveness of net metering, and many consumers may lose interest in installing net metering systems altogether.

More importantly, reduced net metering adoption will deprive the government of access to relatively low-cost solar-generated electricity.

- As a result, the national grid will become increasingly dependent on more expensive sources of power generation, including imported fuels and high-cost thermal plants, which will increase electricity procurement costs and fiscal pressure on the government.

A gradual or tiered buyback mechanism is therefore strongly recommended instead of an abrupt reduction.

2. Net Metering Should Remain Unit-for-Unit

The proposed shift toward separate import and export metering, instead of true unit-for-unit netting, undermines the core principle of net metering.

If electricity imported from the grid is charged at full retail tariffs while exported solar electricity is compensated at a much lower rate, it will cause serious disappointment and loss of confidence among solar consumers. This approach effectively converts net metering into a net billing system, making solar investments financially unattractive.

Such a change will discourage future solar installations and ultimately harm the government as well, by reducing private sector contribution of affordable solar power and increasing reliance on costly electricity sources.

It is respectfully requested that NEPRA retain the unit-for-unit net metering mechanism, which has proven successful and sustainable in Pakistan.

3. Limiting Solar Capacity to Approved Load

Restricting solar system capacity strictly to the approved load removes flexibility for industries with seasonal demand variations or future expansion plans.

Allowing solar capacity up to 1.25 times the approved load, subject to technical feasibility, would be a more balanced approach.

4. Reduction of Contract Period to Five Years

Reducing the net metering agreement period from seven years to five years increases uncertainty and discourages long-term investment.

A minimum contract duration of seven years should be retained, particularly for commercial and industrial prosumers, to ensure reasonable return on investment.

5. 80% Transformer Capacity Restriction

Allowing DISCOs to stop accepting new net metering applications once solar penetration reaches 80% of transformer capacity may lead to arbitrary rejections.

Instead of outright refusal, DISCOs should be encouraged to upgrade infrastructure based on technical assessments.

6. Mandatory Technical Feasibility for 250 kW and Above

While technical review is understandable for large systems, mandatory feasibility studies at the 250 kW threshold may delay genuine industrial projects.

Clear timelines and transparent procedures should be defined to avoid unnecessary delays.

Conclusion

Net metering has been one of Pakistan's most successful renewable energy initiatives, providing affordable electricity, reducing peak load pressure, and supporting national energy sustainability. Replacing unit-for-unit net metering with a separate import-export mechanism and significantly reducing incentives may reverse this progress and increase dependence on costly power generation sources.

I respectfully request NEPRA to reconsider these concerns and adopt a balanced, gradual, and industry-friendly approach in the final Prosumer Regulations 2025.


Thank you for providing the opportunity for public consultation.

Yours sincerely,

Zaheer Abbas Bhatti

Industrial Consumer / Prosumer

Sindh, Pakistan

 03453947777

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Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:38 AM
To: Shahid Farooque
Subject: Fwd: Request for Administrative Directions to DISCOs and Public Clarification Regarding Draft NEPRA (Prosumer) Regulations, 2025
Attachments: Nepra Ad.jpeg

----- Original Message -----

Subject: Fwd: Request for Administrative Directions to DISCOs and Public Clarification Regarding Draft NEPRA (Prosumer) Regulations, 2025
Date: 2025-12-19 14:36
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: FW: Request for Administrative Directions to DISCOs and Public Clarification Regarding Draft NEPRA (Prosumer) Regulations, 2025
Date: 2025-12-19 11:09
From: "Registrar" <registrar@nepra.org.pk>
To: "Naweed Illahi Sahikh" <naweedshaikh@nepra.org.pk>, <cad@nepra.org.pk>

From: Ahsen Ali <ahsen9pk@gmail.com>
Sent: Thursday, December 18, 2025 11:17 PM
To: registrar@nepra.org.pk
Cc: Chairman@nepra.org.pk; info@nepra.org.pk; mirad@fesco.com.pk; ceo@fesco.com.pk
Subject: Request for Administrative Directions to DISCOs and Public Clarification Regarding Draft NEPRA (Prosumer) Regulations, 2025

Respected Sir,

With reference to the subject cited and regarding the refusal by certain DISCOs to accept net metering applications on the premise that the NEPRA (Prosumer) Regulations, 2025 have come into force, while they have been published by NEPRA for eliciting public opinion (copy of newspaper ad attached), I respectfully submit the following for the Authority's kind consideration.

1. ADMINISTRATIVE MISAPPLICATION BY DISCOS

It is being observed across multiple DISCO jurisdictions that:

- * Net metering applications are not being accepted or processed, and
- * Field offices are treating draft Prosumer Regulations as enforceable law.

This practice is administrative in nature and is occurring under NEPRA's regulatory oversight, despite the absence of any Official Gazette notification as required under Section 47(1) of the NEPRA Act, 1997.

2. LEGAL POSITION (STATUTORY & JUDICIAL)

STATUTORY FRAMEWORK

* Section 47(3), NEPRA Act, 1997


Requires publication of proposed regulations for public opinion prior to enforcement.

* Section 47(1), NEPRA Act, 1997

Regulations acquire legal force only after notification in the Official Gazette.

Accordingly, the Prosumer Regulations, 2025 remain draft and unenforceable, and the NEPRA Distributed Generation & Net Metering Regulations, 2015 continue to remain valid and operative.

SUPREME COURT OF PAKISTAN – ADMINISTRATIVE LAW PRINCIPLES

 * Government of N.W.F.P. v. Said Kamal Shah (PLD 1986 Supreme Court 360) The Honourable Supreme Court categorically held that rules, regulations, or instructions which are not duly notified in the Official Gazette do not acquire the force of law and cannot be enforced, nor can any rights or obligations be created thereunder.

* Abdul Karim v. Government of Pakistan (PLD 2016 Supreme Court 705) The Supreme Court reaffirmed that administrative actions must strictly conform to statutory requirements, and that unnotified or informal instruments cannot be relied upon to regulate rights, liabilities, or conduct of citizens.

These judgments establish the settled principle that administrative authorities cannot act on draft, proposed, or unnotified regulatory instruments.

3. COMPOUNDING EFFECT OF MEDIA MISREPORTING

Simultaneously, incorrect reporting by sections of print and electronic media — suggesting that the Prosumer Regulations are already in force — is:

 * Reinforcing ultra vires administrative conduct by DISCOs

* Creating confusion among consumers and investors

* Undermining regulatory certainty in the distributed generation and renewable energy sector

4. RESPECTFUL REQUEST FOR NEPRA'S IMMEDIATE INTERVENTION

In order to restore legality, uniformity, and regulatory clarity, we respectfully request the Authority to:

(A) ISSUE EXPLICIT ADMINISTRATIVE DIRECTIONS TO ALL DISCOS

Directing them to:

* Continue acceptance and processing of net metering applications strictly under the NEPRA Distributed Generation & Net Metering Regulations, 2015

* Refrain

from acting upon draft or unnotified regulations

- * Ensure consistent compliance across all field formations

(B) ISSUE AN OFFICIAL PUBLIC / MEDIA CLARIFICATION

Clearly stating that:

- * The Prosumer Regulations, 2025 are not yet in force
- * They shall only take effect after finalization and Gazette notification
- * Existing net metering regulations remain applicable until such time

5. REGULATORY IMPORTANCE

Such timely intervention is essential to:

- * Prevent continued ultra vires administrative practices
- * Avoid financial and contractual disputes
- * Maintain investor confidence in distributed renewable energy
- * Uphold the Authority's statutory mandate and rule of law

We shall be grateful for NEPRA's guidance and directions to ensure lawful and orderly regulatory implementation.

Yours sincerely,

Engr. Dr. Muhammad Ahsen Ali

(Ph.D. Electrical Engineering)

Ex-S.E (Chashma Nuclear Power Plant-1)

Professional Engineer (Pakistan Engineering Council)

COO

Shahzad Solar (Private) Limited

Jhang Road Faisalabad, Punjab

Ph#+92342-2334444

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Regards

Lashkar Khan Qambrani

Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:38 AM
To: Shahid Farooque
Subject: Fwd: Publication of Draft of The National Electric Power ViewRegulatory (Prosumer) 15- Authority Regulations, 2025 Eliciting Public Opinion

----- Original Message -----

Subject: Fwd: Publication of Draft of The National Electric Power ViewRegulatory (Prosumer) 15- Authority Regulations, 2025 Eliciting Public Opinion
Date: 2025-12-18 11:30
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>



----- Original Message -----

Subject: FW: Publication of Draft of The National Electric Power ViewRegulatory (Prosumer) 15- Authority Regulations, 2025 Eliciting Public Opinion
Date: 2025-12-18 10:30
From: "Registrar" <registrar@nepra.org.pk>
To: <cad@nepra.org.pk>

From: MUHAMMAD RIZWAN <m.rizwan407@gmail.com>
Sent: Thursday, December 18, 2025 10:26 AM
To: registrar@nepra.org.pk
Subject: Publication of Draft of The National Electric Power ViewRegulatory (Prosumer) 15- Authority Regulations, 2025 Eliciting Public Opinion

Hi NEPRA officials,

As I Studied the Bill, its looks like discourage for Net metering and due to cutt the price of Unit mostly it will introduce the backup batteries system or totally of grid.



NEPRA Shouldn't consider this cutt changes, even they should Introduce the High Demand and Low Demand Net metering supply, it will be the good option when the energy needed from Net meters pay them the current rate and when energy demand is not high the rate should go down from current.

I suggest the single rate to cutt down very iow is discouraging for Net metering which definitely impact on Power consumption and supply.

MUHAMMAD RIZWAN

--

Regards

Lashkar Khan Qambrani

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:38 AM
To: Shahid Farooque
Subject: Fwd: Subject: Comments on Draft Nepra Prosumer Regulations 2025, Transition from Net Metering to Net Billing, Industrial Cross Subsidy, and the Need to Rationalize Fixed Charges for Distributed Solar Consumers
Attachments: 1000187113.jpg

----- Original Message -----

Subject: Fwd: Subject: Comments on Draft Nepra Prosumer Regulations 2025, Transition from Net Metering to Net Billing, Industrial Cross Subsidy, and the Need to Rationalize Fixed Charges for Distributed Solar Consumers
Date: 2025-12-18 08:51
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Subject: Comments on Draft Nepra Prosumer Regulations 2025, Transition from Net Metering to Net Billing, Industrial Cross Subsidy, and the Need to Rationalize Fixed Charges for Distributed Solar Consumers
Date: 2025-12-18 00:45
From: Rehan Jawed <rehanjawed01@hotmail.com>
To: "awaisleghari@hotmail.com" <awaisleghari@hotmail.com>, "chairman@nepra.org.pk" <chairman@nepra.org.pk>, Registrar <registrar@nepra.org.pk>, "amina.ahmed@nepra.org.pk" <amina.ahmed@nepra.org.pk>, "mubashar.jalal@nepra.org.pk" <mubashar.jalal@nepra.org.pk>, Consumer Affairs Department <cad@nepra.org.pk>

Sardar Awais Ahmad Leghari,
Honourable Federal Minister
Ministry of Energy Power Division
Government of Pakistan
Islamabad

Chairman,
National Electric Power Regulatory Authority
Islamabad

Registrar,
National Electric Power Regulatory Authority
Islamabad

Dear All,

I would like to congratulate you and your teams on initiating the transition from the earlier net metering framework to the net billing regime. I have been repeatedly highlighting the undeserved benefit being availed by net metering users. This shift reflects an important policy recognition that energy exported to the grid and energy imported from the grid must be valued separately in order to improve transparency and system discipline.

- At the same time, I wish to highlight a structural gap that, if left unaddressed, will continue to undermine tariff rationalization efforts and exacerbate the industrial cross subsidy burden, which currently stands at approximately Rs 131 billion annually.

While the transition to net billing corrects energy pricing distortions, it does not adequately address recovery of fixed grid costs from distributed solar consumers. Residential consumers under net billing continue to rely on the national grid as a full standby and balancing mechanism, yet their contribution towards capacity payments, network fixed costs, and system availability remains disproportionately low. As a result, these costs continue to be shifted onto industrial and fully grid dependent consumers.

This imbalance has two serious implications. First, it directly sustains and potentially increases the cross subsidy burden imposed on industry, further weakening competitiveness, exports, and electricity demand. Second, it significantly improves the economics of combining rooftop solar with battery energy storage systems. After transition from net metering to net billing, There is a massive flood of Battery about to come in, which will result in residential users keeping grid on standby without paying anything against fixed cost of grid which will ultimately be recovered from Industry.

As grid tariffs rise and fixed costs remain under recovered from net billing consumers, higher income households will logically invest in large battery systems, progressively reducing their grid dependence while still expecting grid availability. This will accelerate demand erosion, increase stranded capacity costs, and intensify tariff pressure on remaining consumers.

Unless fixed charges are imposed on net billing consumers on a per kW (Sanctioned load) basis, the transition from net metering to net billing will remain incomplete from a cost recovery perspective. Demand will continue to shrink, grid costs will be socialized over a smaller consumer base, and industrial cross subsidies will persist despite policy intentions to reduce them.

I respectfully submit that fixed charges should be applied to net metering /Net billing consumers based on sanctioned load, at a rate of Rs 1,250 per kW. Such a measure would materially improve recovery of grid fixed costs, reduce reliance on industrial cross subsidies, and align the net billing framework with the economic realities of a capacity constrained power system, particularly as tariff rebasing approaches.

This is not a punitive intervention. It is a necessary structural correction to protect grid sustainability, lower the Rs 131 billion cross subsidy burden on industry, and prevent an uncontrolled shift towards battery driven grid defection by affluent residential consumers.

I hope these comments are received in the spirit of constructive policy engagement, and I will send further comments on this matter.

Yours sincerely,

Rehan Javed
Industrial Consumer
03458256891

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:43 AM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2025-12-26 09:13
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject:
Date: 2025-12-25 22:24
From: musharraf shah <musharraf1682@gmail.com>
To: cad@nepra.org.pk

Dear sir I have installed solar system at my home on my own expense the old policy may please be continued Thanks
Regards

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:43 AM
To: Shahid Farooque
Subject: Fwd: Do not replace net metering with net billing. Otherwise, will file lawsuit

----- Original Message -----

Subject: Fwd: Do not replace net metering with net billing. Otherwise, will file lawsuit
Date: 2025-12-26 09:12
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Do not replace net metering with net billing. Otherwise, will file lawsuit
Date: 2025-12-26 00:51
From: Mike Johnson <mike092019@gmail.com>
To: cad@nepra.org.pk
Copy: chairman@nepra.org.pk, registrar@nepra.org.pk

AoA NEPRA,

I recently came across the following news:

NEPRA Proposes An End To Net Metering For Solar Users <https://www.brandsynario.com/nepra-end-to-net-metering/>

This news is very disturbing and shocking for many net metering users like me who have invested millions of rs. in setting up solar systems for power generation only to find out that the government is reducing the buyback rate per unit by 50%.

This is extremely unfair and unethical. We have invested millions of rupees in solar systems and it will take at least 10 years to recover our investment.

NEPRA reduces buyback rate next year, then more than one lac net metering users will file lawsuits against NEPRA.

Hence, please continue net metering till 2030 at least so that we can recover our investment.

Thanks,
Asif Khan
Islamabad

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:43 AM
To: Shahid Farooque
Subject: Fwd: New net muttering rule

----- Original Message -----

Subject: Fwd: New net muttering rule

Date: 2025-12-26 09:12

From: cad@nepra.org.pk

To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: New net muttering rule

Date: 2025-12-25 21:06

From: Latif Muhammad <latif1mohammad908@gmail.com>

To: cad@nepra.org.pk

Have mercy on white color community of poor nation who got solar installed after sacrificing so many needs to install solar panels. All those responsible will be cursed by all and You or your children will pay for this ZULM.

--

Regards


Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:42 AM
To: Shahid Farooque
Subject: Fwd: Strong Legal Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Ongoing Illegal Deductions and Systemic Exploitation of BTPL Solar Consumers

----- Original Message -----

Subject: Fwd: Strong Legal Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Ongoing Illegal Deductions and Systemic Exploitation of BTPL Solar Consumers
Date: 2025-12-24 08:56
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----


Subject: Strong Legal Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Ongoing Illegal Deductions and Systemic Exploitation of BTPL Solar Consumers
Date: 2025-12-23 13:19
From: khurram humaiyun <khumaiyun440@yahoo.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

The Registrar
National Electric Power Regulatory Authority (NEPRA) Islamabad

Sir,

I submit these objections under protest to the Draft NEPRA (Prosumer) Regulations, 2025, as published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's official website.

The proposed amendments constitute a material departure from the existing net-metering framework under which thousands of consumers, including myself, installed solar systems with lawful approval and legitimate expectations of regulatory stability, economic viability, and protection against retrospective policy changes. Any reduction in export value, alteration in settlement methodology, or retrospective application would amount to regulatory arbitrariness and violation of the doctrine of legitimate expectation.

As a consumer of BTPL, I am already subjected to persistent and unlawful practices, including arbitrary deduction of solar export units, unauthorized tariff adjustments, and the imposition of vague and unexplained "Miscellaneous Charges," which are conspicuously absent from the billing practices of other electricity distribution companies in Pakistan.

Alarminglly, BTPL, in connivance with IESCO, is presently deducting approximately 30% of my total monthly solar generation without any statutory authority, tariff determination, or transparent methodology, loosely describing the deduction as "closure adjustment." This unilateral action is illegal, non-transparent, and constitutes an unlawful expropriation of consumers' legitimately generated energy, in clear violation of NEPRA's own regulatory mandate.

The proposed Draft Regulations will further institutionalize this exploitation by shifting the burden of systemic inefficiencies, line losses, electricity theft, and non-recovery onto compliant solar consumers—liabilities for which prosumers bear no legal or moral responsibility. Such an approach is manifestly unjust, discriminatory, and inconsistent with the principles of consumer protection, renewable energy promotion, and regulatory certainty.

If implemented in their present form, the Draft Regulations will render existing solar investments economically unviable, effectively confiscating sunk capital investments made under state-sanctioned policies. This raises serious constitutional

▼ ▼
-concerns, including infringement of fundamental rights relating to lawful business, protection of property, and equality before law.

In view of the foregoing, I formally and unequivocally request NEPRA to:

Reject all adverse, retrospective, or discriminatory provisions affecting existing net-metering/prosumer consumers; Immediately investigate and restrain BTPL and IESCO from unauthorized deductions of solar generation under any nomenclature whatsoever; Ensure that prosumers are not used as a mechanism to offset DISCO losses, inefficiencies, theft, or non-recovery; and Enforce transparent, lawful, and uniform billing practices in strict conformity with NEPRA's tariff determinations.

Failure to address these concerns will leave affected consumers with no option but to seek appropriate legal remedies before competent forums, including constitutional and regulatory courts.

These objections may kindly be placed on record and considered in letter and spirit prior to finalization of the Draft Regulations.

Yours sincerely,

Lt Col (R) Khurram Humaiyun


BTPL Consumer

House No. 602L, Street 17

Overseas Sector-3, Phase-8

Bahria Town, Rawalpindi, Pakistan

Mobile: 0331-5246056

 Yahoo Mail: Search, organise, conquer [1]

Links:

[1]

https://mail.onelink.me/107872968?pid=placement&c=US_Acquisition_YMktg_315_SearchOrgConquer_EmailSignature&af_sub1=Acquisition&af_sub2=US_YMktg&af_sub3=&af_sub4=100002039&af_sub5=C01_Email_Static_&af_ios_store_cpp=0c38e4b0-a27e-40f9-a211-f4e2de32ab91&af_android_url=https://play.google.com/store/apps/details?id=com.yahoo.mobile.client.android.mail&listing=search_organize_conquer

--

Regards

Lashkar Khan Qambrani

Director (CAD)-NEPRA



Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:42 AM
To: Shahid Farooque
Subject: Fwd: Concerns Regarding Proposed Gross Metering Framework for Rooftop Solar Consumers

----- Original Message -----

Subject: Fwd: Concerns Regarding Proposed Gross Metering Framework for Rooftop Solar Consumers
Date: 2025-12-24 08:50
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Concerns Regarding Proposed Gross Metering Framework for Rooftop Solar Consumers
Date: 2025-12-23 19:28
From: Zahid Riaz <zahidriaz80@gmail.com>
To: registrar@nepra.org.pk
Copy: Chairman@nepra.org.pk, cad@nepra.org.pk, membertainiff@nepra.org.pk

Dear Registrar,
National Electric Power Regulatory Authority (NEPRA), Islamabad

I hope this message finds you well.

I am writing as a concerned electricity consumer and prospective rooftop solar user to respectfully register serious concerns regarding the proposed shift from net metering to a gross metering framework for new distributed solar installations.

Although I fully appreciate NEPRA's responsibility to safeguard grid stability, address revenue sustainability of DISCOs, and ensure fairness across consumer categories, the proposed gross metering mechanism raises significant practical and economic challenges for residential consumers in Pakistan, which merit reconsideration.

First, gross metering fundamentally weakens the economic rationale for rooftop solar for households. Under the proposed framework, consumers are required to purchase all electricity consumed at full retail tariffs while selling all solar generation at a substantially lower feed-in rate. This accounting separation effectively nullifies the benefit of self-consumption, even when solar power is generated and used simultaneously within the premises. As a result, households are forced into a "sell cheap, buy expensive" structure that materially increases payback periods and, in many cases, renders solar financially unviable.

Second, this approach disproportionately affects middle-income households who have adopted solar not as commercial generators, but as a hedge against rising tariffs, load-shedding, and supply uncertainty. Many such consumers rely on bank financing to install rooftop systems. Under gross metering, fixed loan repayments combined with continued high electricity bills can actually increase monthly financial burden, undermining consumer trust in regulatory predictability.

•
Third, gross metering fails to recognize the physical reality of distributed generation. Rooftop solar reduces local demand on the grid, lowers transmission and distribution losses, and defers network investment. Treating all generated energy as exported, regardless of instantaneous self-consumption, ignores these system-level benefits and discourages behavior that would otherwise reduce peak demand stress.

Fourth, the proposed framework risks slowing Pakistan's distributed renewable energy adoption at a time when energy affordability, import dependence, and climate commitments require acceleration rather than contraction. International experience suggests that abrupt policy reversals in rooftop solar regimes lead to market stagnation, legal disputes, and loss of investor and consumer confidence.

In light of these concerns, I respectfully urge NEPRA to consider alternative approaches, such as:

*

Retaining net metering for residential consumers up to a defined capacity threshold;

*

Introducing a hybrid or net-billing model that preserves self-consumption benefits while rationalizing export compensation;

*

Explicitly recognizing behind-the-meter self-consumption as non-billable energy;

*

Conducting transparent stakeholder consultations with residential consumers before finalizing the framework.

My intention in writing is not to oppose regulatory reform, but to advocate for a balanced approach that protects the grid and DISCO revenues without inadvertently penalizing responsible electricity consumers who have invested in clean, distributed energy solutions in good faith.

I sincerely hope NEPRA will take these consumer-level implications into account while finalizing its policy direction. I would be grateful if these concerns could be formally acknowledged and considered as part of the regulatory process.

Thank you for your time and attention.

Yours sincerely,

 Dr. Zahid Riaz

MBA (IBA, Karachi), MPhil and PhD (UNSW, Australia).

Mobile. 0300 856 2587.

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:42 AM
To: Shahid Farooque
Subject: Fwd: Reservations/ Objections against New Net Metering Policy/ Draft NEPA Prosumer Regulations 2025

----- Original Message -----

Subject: Fwd: Reservations/ Objections against New Net Metering Policy/ Draft NEPA Prosumer Regulations 2025
Date: 2025-12-24 08:49
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Reservations/ Objections against New Net Metering Policy/ Draft NEPA Prosumer Regulations 2025
Date: 2025-12-23 20:14
From: Mansoor Butt <mansoorbutt4444@gmail.com>
To: cad@nepra.org.pk

Sir,

I submit my objections to the Draft NEPA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

Such a policy may well be contrary to the objectives of renewable energy promotion, regulatory certainty and consumer protection.

I respectfully request NEPA to review any adverse or retrospective changes affecting existing net-metering consumers.

Best Regards

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:41 AM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2025-12-24 08:49
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject:
Date: 2025-12-23 21:57
From: Rashid Lodhi <rashidlodhi30@gmail.com>
To: cad@nepra.org.pk

Aoa it is to inform U that as solar energy user it is to submit that this is not finalised yet what to do with the solar energy users. Daily I heard & see policies changes which is not understood. First govt announced to go towards solar energy & now govt is not understanding the solar energy users problem .
Everyone spent handsome amounts & it is not feasible now to reduce rates. This policy should not be implemented & consumer should be looked after. Thanks

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:41 AM
To: Shahid Farooque
Subject: Fwd: Regarding netmeeting

----- Original Message -----

Subject: Fwd: Regarding netmeeting
Date: 2025-12-24 08:47
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Regarding netmeeting
Date: 2025-12-24 07:02
From: Rawaf karim <rufikarreem112233@gmail.com>
To: cad@nepra.org.pk

Respected Sir/Madam,

I am writing as a concerned citizen and electricity consumer of Pakistan to express my serious concern regarding the proposed changes to the Net Metering policy in 2025, particularly the reduction in buy-back rates and the reported shift towards a gross or net-billing system.

Net metering has played a critical role in encouraging renewable energy adoption in Pakistan. Thousands of middle-class households invested their lifetime savings in rooftop solar systems based on the existing NEPRA framework and long-term payback assumptions. Abrupt policy changes not only undermine public trust but also create financial uncertainty for citizens who acted in good faith under earlier regulations.

At a time when Pakistan faces:

- Rising electricity tariffs
- Severe load-shedding
- Foreign exchange pressure due to fuel imports • Climate and environmental challenges

discouraging rooftop solar sends the wrong signal. Distributed solar generation reduces peak load stress, lowers transmission losses, and decreases reliance on imported fossil fuels — all at no additional cost to the government.

Shifting to a gross or net-billing system with significantly reduced export rates will:

- Make solar financially unviable for households • Slow down renewable energy adoption • Negatively impact small investors and local solar industry jobs • Increase long-term pressure on the national grid

Many countries globally are strengthening, not weakening, their net metering policies to ensure energy security and sustainability.

I respectfully request NEPRA to:

1. Maintain the existing net metering structure for current and future consumers 2. Avoid sudden reductions in buy-back rates 3. Conduct transparent stakeholder consultations before implementing any major changes 4. Protect consumer investments already made under previous policies

Energy policy should be stable, predictable, and pro-consumer. Pakistan cannot afford policies that discourage clean, decentralized energy solutions.

I sincerely hope NEPRA will reconsider these proposed changes in the national interest.

Thank you for your time and consideration.

Yours faithfully,

[Rawaf karim]

CNIC: 3740544815099

City: Rawalpindi

Contact : +923435884701

--

Regards



Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:41 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025
Date: 2025-12-23 08:56
From: cad@nepra.org.pk
To: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025
Date: 2025-12-22 22:24
From: khurram humaiyun <khumaiyun440@yahoo.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

The Registrar

National Electric Power Regulatory Authority (NEPRA) Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers Sir, I hereby submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's official website.

The proposed amendments to the net-metering/prosumer framework will cause serious financial loss to existing solar consumers who installed solar systems under a legally approved regime, with legitimate expectations of affordable and predictable electricity costs. Any reduction in export value or adverse modification in settlement mechanisms would deprive consumers of the benefits of self-generated electricity and defeat the very purpose of net-metering.

As a consumer of BTPL, I am already adversely affected by arbitrary deduction and reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and so-called "Miscellaneous Charges" routinely added to BTPL electricity bills, which do not appear in the bills of any other electricity distribution company in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies—matters for which consumers bear no responsibility whatsoever.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses, inefficiencies, or electricity theft; and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Lt Col (R) Khurram Humaiyun

BTPL Consumer

House No. 602L, Street 17

Overseas Sector-3, Phase-8

Bahria Town, Rawalpindi, Pakistan

Mobile: 0331-5246056

Shāid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:53 AM
To: Shahid Farooque
Subject: Fwd: Objections over Draft NEPRA regulations 2025

----- Original Message -----

Subject: Fwd: Objections over Draft NEPRA regulations 2025
Date: 2025-12-26 09:51
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections over Draft NEPRA regulations 2025
Date: 2025-12-24 19:31
From: Con Temporary <contemporary@gmail.com>
To: cad@nepra.org.pk, chairman@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Dear Chairman,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
MUHAMMAD SHAFI

[BTPL Consumer /
HOUSE 339
STREET 17
B 17
ISLAMABAD.

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:26 AM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2026-01-05 09:22
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject:
Date: 2025-12-30 12:37
From: muhammad aamir <tradevision786@gmail.com>
To: cad@nepra.org.pk

Dear Sir

We learnt to know that nepra is going to end the net metering policy.

In this regard I protest against this policy. We generate electricity and transfer the extra units to Lesco which help in economy.

Muhammad Aamir
599 Block B
JUBILEE TOWN
03040920826

 regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 12:00 PM
To: Shahid Farooque
Subject: Fwd: I am denying new net metering on old consumers.

----- Original Message -----

Subject: Fwd: I am denying new net metering on old consumers.
Date: 2025-12-29 09:28
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: I am denying new net metering on old consumers.
Date: 2025-12-28 22:52
From: kashif ali <kashi5347387@gmail.com>
To: cad@nepra.org.pk

Dear nepra,

I am denying and against new net metering law on old consumers, even it's not implemented on all consumers,

Regards.

Kashif Ali
03235347387

Consumer # 16112321115404
37-H, Nadeem town Dakkhana stop Multan Chungi Multan road Lahore

 regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:27 AM
To: Shahid Farooque
Subject: Fwd: Review of New Solar Energy Systems Policy

----- Original Message -----

Subject: Fwd: Review of New Solar Energy Systems Policy
Date: 2026-01-05 09:21
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Review of New Solar Energy Systems Policy
Date: 2026-01-02 14:30
From: rafi Khan <rafikhan58@gmail.com>
To: Registrar@nepra.org.pk, cad@nepra.org.pk, Chairman@nepra.org.pk

My Dear Sir!

IPPs of Pakistan have been bleeding the people of Pakistan and its economy for the last 30-35 years with the alleged connivance of its leadership and senior bureaucracy. The unique contracts in this regard are laughable in the world of morality and ethics and are the principal cause of Pakistan's industrial failure and economic bankruptcy. Unfortunately, those who have planned and executed these contracts and the projects have allegedly violated their oath of loyalty to the State and its people.

The US, Europe, China, India, and even countries like Bangladesh, Vietnam, and Indonesia have helped their people through positive policies for development by providing access to affordable energy resources, such as solar systems and hydroelectricity. However, it is quite unfortunate that our leadership, despite being aware of the critical negative economic issues resulting from IPPs, has further extended their contracts upon maturity to further their alleged corrupt practices, thereby fleecing the poor and undermining Pakistan's economic security.

In Pakistan, the people who tried to diversify the generation of cheap solar energy on their rooftops for their domestic and industrial uses based on earlier government policy and assurances are really upset now, on the news of a change in the policy to benefit the crocodiles of IPPs instead of the interest of the State and its poor people. The current step of the government's backing towards the mafia is detrimental to Pakistan's economic security and sovereignty. This cannot be expected from any patriot who is loyal and sincere towards Pakistan and its people.

May I, therefore, request your excellency and those in authority to kindly reconsider and review the new policy on Solar Energy Systems, as well as the termination of IPP contracts that are over and above our capacity for the distribution system of electricity in Pakistan. It shall be in the best interest of Pakistan's existence. A "STATUS QUO" in this respect shall help in saving the future of our children and the security of Pakistan.

For your kind consideration, please.

Brig Rafi uz Zaman Khan(Retd)

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:28 AM
To: Shahid Farooque
Subject: Fwd: Shift from Net Metering

----- Original Message -----

Subject: Fwd: Shift from Net Metering
Date: 2026-01-05 09:00
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Shift from Net Metering
Date: 2026-01-03 22:23
From: Qais Hussain <qaismhussain@gmail.com>
To: cad@nepra.org.pk

Dear Sirs,
NEPRA is proving to be retrogressive in their decision to do away with Net-Metering.
Netting off is an accepted and a universal process.

Basically, what NEPRA is doing is playing in the hands of a direction-less government. The real purpose behind changing to gross-Metering is to allow the government to collect hefty taxes on units imported during non solar hours. This is not equitable ipso facto and a sinking political system is fighting for its survival.

This government has failed to utilise the full potential of the solar energy. The energy generated by the solar applications is curtailing line losses, eliminating the cost of transmission and the cost of transformation.

The system, no doubt, has extra energy now available. The government should supply this energy uninterrupted to our value added industry, especially the textile to help boost our exports.

We, the citizens, totally reject this latest decision by NEPRA. My request is that: "Stop being another tool" like the NA and Judiciary.

Thank you and warm regards.
Qais Mazhar Hussain
0321 842 0391

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA


Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:28 AM
To: Shahid Farooque
Subject: Fwd: New Net Metering Policy, Dear Sir,

----- Original Message -----

Subject: Fwd: New Net Metering Policy, Dear Sir,
Date: 2026-01-05 08:58
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

 Subject: New Net Metering Policy, Dear Sir,
Date: 2026-01-05 08:48
From: MUHAMMAD ASHRAF <muhammedashraf.ch.1953@gmail.com>
To: cad@nepra.org.pk

Your new policy regarding Net Metering is not acceptable to me.

Best regards, *Muhammad Ashraf. Mobile #
0321-4968383*

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:29 AM
To: Shahid Farooque
Subject: Fwd: Net Metering

----- Original Message -----


Subject: Fwd: Net Metering
Date: 2026-01-02 09:43
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net Metering
Date: 2026-01-01 13:10
From: Habib Babar <habibbabar@gmail.com>
To: cad@nepra.org.pk

Sir,
People has invested huge amounts to get some relief in producing environmental friendly solar energy. Some obtained loans while some sold their ornaments and other valuable assets to get benefit from solar energy.
Now the proposed policy to change Net Metering to Net Billing is creating serious financial burden on millions of Pakistanis to survive.
It is earnestly requested to review the proposed policy for great relief to the consumers.
Regards
Habib ur Rehman

--
Regards

 Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:31 AM
To: Shahid Farooque
Subject: Fwd: NET METERING POLICY
Attachments: NEPRA-01 001.jpg; NEPRA-02 001.jpg; NEPRA-03 001.jpg

----- Original Message -----

Subject: Fwd: NET METERING POLICY
Date: 2026-01-02 09:39
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>



----- Original Message -----

Subject: NET METERING POLICY
Date: 2026-01-01 16:59
From: "Chishti" <chishti@naurus-sundip.com>
To: <registrar@nepra.org.pk>
Copy: <chairman@nepra.org.pk>, <cad@nepra.org.pk>

MR WASIM ANWAR BINDER

DEAR SIR,

SUBMITTED FOR YOUR KIND CONSIDERATION & EARLIEST RESPONSE.

Regards

Tajammul Hussain Chishti_ |__ _Executive Director_ |_



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Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:31 AM
To: Shahid Farooque
Subject: Fwd: The Registrar (NEPRA) Islamabad Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers.

----- Original Message -----

Subject: Fwd: The Registrar (NEPRA) Islamabad Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers.

Date: 2026-01-02 09:39

From: cad@nepra.org.pk

To: Zabihullah <zabihullah@nepra.org.pk>

Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: The Registrar (NEPRA) Islamabad Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers.

Date: 2026-01-01 19:05

From: khalid mehmoood <kmehmood59@yahoo.com>

To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Copy: "registrar@nepra.org.pk" <registrar@nepra.org.pk>

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Khalid Mehmood

Generation License No. DGL/1418/2019

IESCO Consumer ref No. 1514233326800

Address: House No. 676 Street 34 Block C Sector B-17 MPCHS Islamabad.

Contact No. 0331-5186389

Yahoo Mail: Search, organise, conquer [1]

Links:

[1]

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[f4e2de32ab91&af_android_url=https://play.google.com/store/apps/details?id=com.yahoo.mobile.client.android.mail&listing=search_organize_conquer](https://play.google.com/store/apps/details?id=com.yahoo.mobile.client.android.mail&listing=search_organize_conquer)

--

Regards

Lashkar Khan Qambrani

Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:31 AM
To: Shahid Farooque
Subject: Fwd: Net Metering Policy

----- Original Message -----

Subject: Fwd: Net Metering Policy
Date: 2026-01-02 09:37
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net Metering Policy
Date: 2026-01-01 20:50
From: Saad Mustafa <engr_saadmustafa@yahoo.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Dear Sir,

Assalam u Alaikum,

I urge you to reconsider the proposed decision regarding the shift from net metering to net billing, taking into account its potential impact on the public and energy producers. Previous decisions have shown that the effects of such changes can be far-reaching and unforeseen, as was the case with the introduction of net metering.

As an engineer myself, I predict that this decision may lead to unintended consequences, causing problems for Independent Power Producers (IPPs) and Distribution Companies (DISCOs) within a short period. I strongly advise thorough consideration and evaluation of the potential outcomes before implementation.

A more effective approach would be to focus on reducing electricity prices and incentivizing higher consumers with lower tariffs, which would not only benefit the public but also encourage sustainable energy production.

Sincerely,
Engr Saad Mustafa
Yahoo Mail: Search, Organize, Conquer [1]

Links:

[1]
https://mail.onelink.me/107872968?pid=nativeplacement&c=US_Acquisition_YMktg_315_SearchOrgConquer_EmailSignature&af_sub1=Acquisition&af_sub2=US_YMktg&af_sub3=&af_sub4=100002039&af_sub5=C01_Email_Static_&af_ios_store_cpp=0c38e4b0-a27e-40f9-a211-f4e2de32ab91&af_android_url=https://play.google.com/store/apps/details?id=com.yahoo.mobile.client.android.mail&isting=search_organize_conquer

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:32 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers
Date: 2026-01-02 09:37
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers
Date: 2026-01-02 06:45
From: Nazeer Anjum <nazeer.anjum61@gmail.com>
To: registrar@nepra.org.pk

The Registrar;

(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc. Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,



(Engr. Dr. Nazeer Ahmad Anjum)

[BTPL Consumer /

H # 361, St # 17, Block B, Sector B-17, Multigardens, Islamabad

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA




Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:32 AM
To: Shahid Farooque
Subject: Fwd: Shortsighted Policies

----- Original Message -----

Subject: Fwd: Shortsighted Policies
Date: 2025-12-31 17:18
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

 Subject: Shortsighted Policies
Date: 2025-12-31 10:50
From: Tariq Suri <tsuri.794@gmail.com>
To: cad@nepra.org.pk

Assalamualiakum Dear Sir

I am disturbed by the inconsistent policy on electricity management sometimes solar energy use is promoted and now curbed. When you can't produce enough let the public produce and give it to you.

Best Regards

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:32 AM
To: Shahid Farooque
Subject: Fwd: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy

----- Original Message -----

Subject: Fwd: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy
Date: 2026-01-01 09:17
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy
Date: 2025-12-31 19:17
From: Waleed Malik <waleed_malik2@yahoo.com>
To: <registrar@nepra.org.pk>
Copy: <chairman@nepra.org.pk>

I am a registered Solar Net Metering consumer operating under a valid approval / license issued pursuant to the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. My particulars are provided below for official record:

Consumer Information:

Name: Waleed Ahmed

Postal Address: House 486, Street 8, Sector G-11/1, Islamabad Distribution Company (DISCO): IESCO

Through this submission, I hereby lodge a formal complaint under NEPRA's Consumer Affairs framework against the recently notified Solar Net Metering / Net Billing Policy, on the following legal and regulatory grounds:

1. The new policy adversely affects existing net metering consumers who made capital investments based on the earlier notified regulations, approved tariffs, and legally executed agreements.
2. The retrospective or altered application of revised billing mechanisms undermines the principle of regulatory certainty and legitimate consumer expectation.
3. The policy materially changes the financial and commercial terms under which net metering licenses were granted, without adequate consumer consultation or transitional protection.
4. The revised framework discourages distributed generation and contradicts the objectives of renewable energy promotion, consumer protection, and sustainable power sector development.

It is respectfully submitted that all existing net metering consumers entered into binding agreements in good faith, relying on the continuity and stability of NEPRA's approved regulatory regime. Any unilateral modification impacting existing license holders raises serious consumer protection and regulatory compliance concerns.

Relief Sought:

In view of the above, I respectfully request NEPRA to:

- a) Safeguard the rights of existing net metering consumers by exempting them from the application of the new policy;
- b) Review the notified policy through due stakeholder consultation in accordance with best regulatory practices; and
- c) Ensure that any future regulatory changes are prospective in nature and compliant with consumer protection principles.

I request that this complaint be registered, acknowledged, and processed under NEPRA Consumer Affairs procedures, and I may be informed of the outcome accordingly.

Yours sincerely,

Name: Waleed Ahmed

Date: 31/12/2025



Regards

Lashkar Khan Qambrani

Director (CAD)-NEPRA



Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:34 AM
To: Shahid Farooque
Subject: Fwd: Net billing policy

----- Original Message -----

Subject: Fwd: Net billing policy
Date: 2025-12-31 11:37
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Net billing policy
Date: 2025-12-31 10:32
From: shahid kemc <medicalkemc@gmx.com>
To: "Solar. Director Customer Affairs NEPA" <cad@nepra.org.pk>

Request for existing net metering license holders, 1 unit to 1 unit return back of exported units (and not return of units on govt rates) should be retained as here to fore Thanks

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPA


Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:35 AM
To: Shahid Farooque
Subject: Fwd: New Billing

----- Original Message -----

Subject: Fwd: New Billing
Date: 2025-12-31 09:07
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

 Subject: New Billing
Date: 2025-12-30 18:38
From: asma sufi <asmasufi34@gmail.com>
To: cad@nepra.org.pk, Chairman@nepra.org.pk

Dear Sir,

It is with a certain amount of trepidation to read about this new proposed billing initiative. Years ago power load shedding sent the people scampering for alternate solutions so as to conduct their work. UPS/generators (who could afford) became the need of the hour. Years later the birth of the solar panel offered untold relief. Not everyone could afford this luxury so beg, borrow or take loans.

My question is as a tax paying, law abiding Pakistani citizen not be allowed to live comfortably, it has now been over 75 years and we are still hankering after bare necessities of life, if we, as middle class families, have taken the initiative to go after clean energy as also being encouraged by the state. This would be an added burden on those households who have struggled financially to install Solar Panel .

 Sincerely,

Asma Sufi
Retired senior citizen

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA


Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:34 AM
To: Shahid Farooque
Subject: Fwd: Net metering issue

----- Original Message -----

Subject: Fwd: Net metering issue
Date: 2025-12-31 09:06
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

 Subject: Net metering issue
Date: 2025-12-30 19:42
From: Sohail Rana <m.sohailrana@gmail.com>
To: cad@nepra.org.pk

Dear Sir/Madam,


I am writing to formally complain about the recently revised net metering policy, particularly the reduced buy-back rates and changes affecting existing net metering and PLS users.

Many consumers invested significant amounts in solar systems based on the previously approved policy and rates. Applying revised rates to existing users is retrospective in nature and has resulted in financial loss, extended payback periods, and loss of confidence in renewable energy policies.

I respectfully request that existing net metering and PLS users be grandfathered under the original approved rates, and that the revised policy apply only to new applicants. Clear written clarification and stakeholder consultation are also requested.

I hope this matter will be addressed urgently and fairly.

Yours sincerely,

 Sohail Rana
1021 V Block Phase 8 DHA Lahore.
03018200112

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:36 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers
Date: 2025-12-31 09:07
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers
Date: 2025-12-30 18:37
From: "A.Suleman Italtec" <asuleman.italtec@gmail.com>
To: Registrar@nepra.org.pk, Chairman@nepra.org.pk, cad@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Mrs. Riffat Anwer

H.No. 332, St. 100, E-11/1, FECHS,

Islamabad

Tel: 03320942057

Email: asuleman.italtec@gmail.com

Consumer No. 1140201594

--

Regards



Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:53 AM
To: Shahid Farooque
Subject: Fwd: Objections over Draft NEPRA regulations 2025

----- Original Message -----

Subject: Fwd: Objections over Draft NEPRA regulations 2025
Date: 2025-12-26 09:51
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Objections over Draft NEPRA regulations 2025
Date: 2025-12-24 19:31
From: Con Temporary <contemporary@gmail.com>
To: cad@nepra.org.pk, chairman@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Dear Chairman,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
MUHAMMAD SHAFI

[BTPL Consumer /
HOUSE 339
STREET 17
B 17
ISLAMABAD.

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaïd UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:52 AM
To: Shahid Farooque
Subject: Fwd: New Net Billing Policy

----- Original Message -----

Subject: Fwd: New Net Billing Policy
Date: 2025-12-26 09:51
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: New Net Billing Policy
Date: 2025-12-24 20:52
From: Munawar Alam <munawar632@gmail.com>
To: cad@nepra.org.pk

The new Net Billing Policy is unfair and unjust. The govt motivated the users to go for the Solar energy. A lot number of users complied, and spent millions of rupees for the installation of Solar power. The change of billing policy will not only put the consumers in a great loss, rather it would adversely affect the trust of public on the govt policies. It is requested that the new proposed cruel system of billing must not be implemented and the old system of billing may be continued .

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:52 AM
To: Shahid Farooque
Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town Lahore Consumers

----- Original Message -----

Subject: Fwd: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town Lahore Consumers
Date: 2025-12-26 09:51
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>



----- Original Message -----

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town Lahore Consumers
Date: 2025-12-24 23:10
From: sadiqa nakhat <sadiqanakhat50@yahoo.com>
To: registrar@nepra.org.pk
Copy: cad@nepra.org.pk, chairman@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Dear Sir,
Assalamu Alikum

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.



The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. As a retired senior citizen, I made a compulsory saving for 5 years and installed solar system in the month of July 2025. Reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of wapda/ Bahria Town Lahore management I am already adversely affected by:

- 1) Arbitrary deduction/reduction of solar export units
- 2) Illegal charges imposed under the guise of tariff adjustments, and
- 3) "Misc. Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

I am also an active taxpayer even after a retirement of 9 years and I have yet to reap any fruits of my dutifulness and loyalty towards my country.

In this background, the proposed draft regulations will further aggravate the financial exploitation of many solar consumers from different financial backgrounds, such as me, who is the sole breadwinner of my household through my pension only. The proposed agenda aims to use prosumers to reduce inefficiencies, losses, theft, and poor revenue recovery by distribution companies, which would otherwise negatively affect us, the consumers. Such an approach is UNJUST, DISCRIMINATORY, and contrary to the objectives of renewable energy promotion, regulatory system, certainty of economic use and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices.
These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Sadiqa Nakhat

205 Bahria Homes, Sector E, Bahria Town, Lahore, Mohlanwal Road. 53720.
WhatsApp: 03303110044.

--

Regards



Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:47 AM
To: Shahid Farooque
Subject: Fwd: Solar policy

----- Original Message -----

Subject: Fwd: Solar policy
Date: 2025-12-26 09:43
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Solar policy
Date: 2025-12-25 14:40
From: Muhammad Aslam <javed17779@gmail.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Dear sir,

I understand that NEPRA is going to formulate new regulations for Solar Energy. I am a retired person and know it very well that through out the world the governments encourage solar energy since it's a climate friendly energy. It's the cheapest form of energy. That's why the governments in foreign countries give incentives to the people who produce electricity through solar panels since other forms of energy are expensive & not climate friendly.

It is therefore requested not to approve any regulations which discourage solar power. Excess electricity produced by solar panels should be diverted to industrial sectors so that their cost of export items is reduced.

Abolishing Netmetering System & reducing buy back price would discourage the solar sector.

Hopefully NEPRA would consider my suggestion favourably before reaching any final decision.

Regards,

Major Muhammad Aslam Javed Retd

House 22 Lane 7 street 9 Sector B

DHA 2, Islamabad

Phone 03009540337

Sent from Outlook for Android [1]

Links:

[1] <https://aka.ms/AAb9ysg>

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:36 AM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2025-12-31 09:05
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject:
Date: 2025-12-28 10:48
From: Saqib Jadoon <msj10682@gmail.com>
To: cad@nepra.org.pk

Aoa.
This is very unfair that net metering policy is being changed.
We invested and now no use.
After all why common people are always made to suffer.
Saqib

--

Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA



Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:36 AM
To: Shahid Farooque
Subject: Fwd: Request for review of the current policy on net metering and net billing

----- Original Message -----

Subject: Fwd: Request for review of the current policy on net metering and net billing
Date: 2025-12-30 12:17
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

Subject: Request for review of the current policy on net metering and net billing
Date: 2025-12-30 10:09
From: Muhammed Asif Riaz <masifriaz@hotmail.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Chairman, National Electric Power Regulatory Authority (NEPRA), Islamabad

Subject: Request for review of the current policy on net metering and net billing

Dear Sir,

It is with great respect that I, as a responsible citizen, would like to draw your attention to the current policy of NEPRA regarding net metering and net billing, which has become a cause of concern for the public, especially small consumers, in recent times.

Dear Sir, The aim of promoting solar energy was to ensure affordable, clean and sustainable electricity supply to the public. However, due to the current net billing policy and reduction in purchase rates, not only the consumers who have already installed solar systems are being affected, but also new consumers are hesitant to switch to this renewable energy. This situation is likely to severely harm the development of alternative energy sources in the country.

Moreover, in this era of expensive electricity, rising bills and economic pressure, solar energy was a great facility for the public, but the current policy changes are limiting this facility, which seems to be against the public interest.

Therefore, it is a polite request to you that:

The current policy of net metering and net billing should be reconsidered.

The interests of small and domestic consumers should be protected.

A final decision should be taken after consulting stakeholders and public representatives.

An encouraging and sustainable policy should be introduced for the promotion of renewable energy.

We are fully confident that NEPRA has always taken decisions keeping in mind the public interest and national needs, and positive and fair action will be taken by you in this matter as well.

Thank you very much for your attention and time.

Greetings

Muhammad Asif Riaz

Chic number - 42201-0428636-9

Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:37 AM
To: Shahid Farooque
Subject: Fwd:

----- Original Message -----

Subject: Fwd:
Date: 2025-12-30 12:17
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----


Subject:
Date: 2025-12-30 11:05
From: Ijaz Chaudhary <ijazch_isd@hotmail.com>
To: "cad@nepra.org.pk" <cad@nepra.org.pk>

Dear Sir,

Every Photovoltaic Solar panel user has invested for green and low cost energy production in collaboration with the local Govt. The Govt. authority had set around Rs27 per unit, which all had to accept, but now you are showing intention of ending the net metering. Such a unanimous decision for terminating the contractual agreement will not be acceptable. We humbly request for not terminating net metering agreement of both old and new users.

Looking forward for your kind consideration please.

Thank you,

 Engineer Ijaz Maqbool
360 Bahria Town Lahore

Sent from Outlook for Android [1]

Links:

[1] <https://aka.ms/AAb9ysg>

--
Regards

Lashkar Khan Qambrani
Director (CAD)-NEPRA


Shaid UR Rehman

From: Lashkar Khan Qambrani <lashkar.khan@nepra.org.pk>
Sent: Monday, 5 January, 2026 11:37 AM
To: Shahid Farooque
Subject: Fwd: Request for Review/Exemption Under New Net Billing Policy

----- Original Message -----

Subject: Fwd: Request for Review/Exemption Under New Net Billing Policy
Date: 2025-12-30 12:17
From: cad@nepra.org.pk
To: Zabihullah <zabihullah@nepra.org.pk>
Copy: Lashkar Khan <lashkar.khan@nepra.org.pk>

----- Original Message -----

 Subject: Request for Review/Exemption Under New Net Billing Policy
Date: 2025-12-30 11:05
From: Mail Service <wasijunejo@hotmail.com>
To: "Registrar@nepra.org.pk" <Registrar@nepra.org.pk>
Copy: "Chairman@nepra.org.pk" <Chairman@nepra.org.pk>

Dear Sir/Madam,
AoA.

I am writing as a registered Net Metering user to express concern regarding the newly proposed Net Billing Policy, scheduled to take effect from 14 January 2026.

While we support Pakistan's transition to renewable energy, the proposed policy, particularly the purchase rate of Rs. 11.5/unit for new users and Rs. 27/unit for existing users, will adversely impact existing Net Metering investors who installed systems under the previous policy.

These users made long-term financial and environmental commitments based on NEPRA's earlier rules.

 We respectfully request that NEPRA:

1. Exempts existing Net Metering users from the new purchase rate, or
2. Revises the policy to provide fair compensation aligned with original Net Metering rates, ensuring financial viability and continued investment in rooftop solar.

We urge NEPRA to consider the significant implications for renewable energy adoption, investor confidence, and Pakistan's green energy goals.

Thank you for your consideration. We hope for a fair and equitable resolution.

Sincerely,

Wasiuddin Junejo

15/10, Khayaban Farooq Amanat Shaheed, DHA Phase 7 extension, Karachi.
KE Consumer no. LB 368705

Chairman NEPA

From: Chishti <chishti@naurus-sundip.com>
Sent: Thursday, January 1, 2026 5:00 PM
To: registrar@nepra.org.pk
Cc: chairman@nepra.org.pk; cad@nepra.org.pk
Subject: NET METERING POLICY
Attachments: NEPA-01 001.jpg; NEPA-02 001.jpg; NEPA-03 001.jpg

MR WASIM ANWAR BINDER

DEAR SIR,

SUBMITTED FOR YOUR KIND CONSIDERATION & EARLIEST RESPONSE.

Regards

Ajammul Hussain Chishti | Executive Director |

Naurus (Pvt) Ltd.

Ph: 021.111-naurus (628 787)

Fax: 021-32571359

www.naurus-sundip.com

www.chatkhaar.com

www.lazzatfoods.com

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<input checked="" type="checkbox"/> For new action	<input type="checkbox"/> For information
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<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CT/CRM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

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REGISTRAR OFFICE
Date: 3/1-26

Registrar

CHAIRMAN

Dy No: 17
Date: 01-01-26



Thursday, January 01, 2026

Mr. WASIM ANWAR BINDER
Registrar/Public Information Officer
NATIONAL ELECTRIC POWER REGULATORY AUTHORITY
NEPRA TOWER ATTATURK AVENUE (EAST)
SECTOR G-5/1, ISLAMABAD.

Subject: CONCERNS REGARDING THE PROPOSED DISCONTINUATION OF
NET-METERING.

Dear Sir,

I hope this message finds you well. I am writing to formally express my serious concerns regarding the proposed discontinuation of the current net-metering regime, as well as its potential replacement with a net-billing or gross-billing mechanism, as reflected in the recent draft rules issued by NEPRA.

While the challenges facing Pakistan's power sector are acknowledged, I believe that the proposed policy shift may lead to significant negative consequences for the nation's economy, energy security, environmental commitments, and international reputation. Below, I outline several key issues that merit careful consideration.

1. Adverse Impact on Small Consumers and Renewable Energy Adoption

Net metering has played a pivotal role in enabling small residential consumers (15-100 kW) to adopt rooftop solar energy systems, providing them relief from high electricity tariffs, while simultaneously contributing clean energy to the national grid. As of November 2025, Pakistan has approximately more than 4 Lacs net-metering consumers, with nearly 70% being residential users.

Under the proposed net-billing model, exported solar electricity would be compensated at a significantly lower rate of Rs 9-13 per unit, compared to the much higher cost of imported electricity (Rs 55-65 per unit). This substantial disparity would result in greatly extended payback periods, making rooftop solar financially unviable for most households. Such a shift is in stark contrast to regional best practices, such as in our neighboring country, where net metering remains in place for systems up to 10 kW, promoting faster payback periods and sustained renewable energy growth.



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S.I.T.E., Karachi - 75700 - Pakistan.

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Fax: +92-(0)21-3257-1359
www.Naurus-Sundip.com



2. Increased Foreign Exchange Outflows and Economic Strain

The introduction of net-billing would likely push consumers away from grid-tied solar systems in favor of hybrid systems that include lithium battery storage, as exporting excess power to the grid would become financially unattractive. This shift will lead to a significant increase in the importation of lithium batteries and hybrid inverters, placing considerable pressure on Pakistan's foreign exchange reserves.

Conservative estimates indicate that the cost of a 10 kW hybrid system could increase by an additional USD 2,500–3,000, resulting in:

- USD 275 million for 100,000 systems
- USD 1.38 billion if adoption reaches 500,000 systems

Given Pakistan's current foreign exchange challenges, this additional burden on the economy is both avoidable and unsustainable.

3. Environmental Consequences and Impact on Climate Commitments

Pakistan is one of the countries most vulnerable to the effects of climate change, and the nation has made significant commitments at COP forums and other international platforms to:

- Increase the share of renewable energy
- Reduce greenhouse gas emissions
- Promote decentralized clean energy solutions

The proposed policy change, by discouraging rooftop solar adoption, would slow the country's transition to renewable energy and increase reliance on fossil fuel-based grid power. This would not only undermine Pakistan's Nationally Determined Contributions (NDCs) but also damage the nation's credibility in the global climate community. The environmental costs of such a shift would be felt both within Pakistan and globally, as the country's ability to contribute to the global fight against climate change would be compromised.

4. Questionable Justification for System Impact

It is important to highlight that, according to data presented to NEPRA by the Central Power Purchasing Agency (CPPA) in November 2025, the increase in rooftop solar capacity has not significantly impacted grid offtake. Power withdrawals from the grid have remained largely stable, and the primary financial strain on the power sector stems from capacity payments and systemic inefficiencies, rather than from net-metering consumers. Thus, shifting this burden onto clean energy adopters risks eroding public trust and undermining the consistency of national energy policies.



5. A Constructive Way Forward

Instead of discontinuing the net-metering regime, I respectfully suggest that NEPRA consider the following adjustments:

- Retaining net metering for residential systems up to 10 kW
- Introducing reasonable grid usage, line loss, or service charges where justifiable
- Exploring carbon credit mechanisms that would allow DISCOs to monetize emissions reductions in international markets
- Aligning energy policy with national objectives related to climate, industrial growth, and foreign exchange management

These measures would help balance system costs while preserving investor confidence, environmental benefits, and Pakistan's international obligations.

Conclusion

The discontinuation of net metering would risk reversing a rare and successful energy policy, with long-term consequences that far outweigh short-term fiscal considerations. A stable, forward-looking renewable energy policy is critical not only for Pakistan's energy future but also for its reputation as a responsible member of the global community.

I therefore earnestly request that NEPRA reconsider the proposed changes, engage in transparent public consultations, and adopt a more balanced approach that protects consumers, the environment, and Pakistan's national interests.

Thank you for your time and consideration.

Kind regards,

Tajammul Hussain Chishti
Executive Director
Naurus (Pvt) Limited.
C-1/B, Naurus Chowranghi.
S.I.T.E., Karachi.
Cell: +92 321-9201020

Cc: 1). Mr. Waseem Mukhtar, Chairman, NEPRA
2). Director General Consumer Affair Division, NEPRA



Address: C-1/B, Naurus Chowranghi,
S.I.T.E., Karachi - 75700 - Pakistan.



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Fax: +92-(0)21-3257-1359
www.Naurus-Sundip.com

Chairman NEPRA

From: Mahmood Rehman <moodykohatian@gmail.com>
Sent: Thursday, December 25, 2025 1:16 PM
To: Chairman@nepra.org.pk

Dear sir

Your policy regarding frustrating the consumers having installed solar panels aa encouraged by the previous govt is so disappointing and disgusting to say the least. Only to please the IPP owners, you are telling us to discontinue the green energy so that a few thugs could fill their tummies. Well this is so outrageous and if the trend is not reversed, we will put this up on all national and international media telling them how nincompoop and corrupt are our policy makers.

Warm regards

Added DS: ✓ (Add. DS) CC-
01.10.26
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01.10.26

Registrar

39
1.1.26

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For kind information, please.

✓ Chairman 2. M (Tech)
✓ M (Law) ✓ M (Dev)

01.10.26

CHAIRMAN
DY No. 7379
Date: 29-12-25

Chairman NEPRA

From: Abdul Ghaffar <abdulghaffar1081964@gmail.com>
Sent: Tuesday, December 30, 2025 3:16 PM
To: Chairman@nepra.org.pk
Subject: Protest against new Policy for Net Metering.

جناب یہ پالیسی غریب مڈل کلاس لوگوں کو سامنے رکھ کر بنائی جا رہی تھی۔ فی الحال یہ پالیسی غریبوں کے ساتھ سراسر ظلم اور زیادتی ہے۔ یہ صرف کرائے کے بجلی گھروں کو فائدہ دینے کے لئے بنائی گئی ہے جو کہ بغیر بجلی بنائے بھی اربوں روپے وصول کر سکتے ہیں۔ درخواست ہے کہ آپ کا ادارہ اس ظلم کو روک سکتا ہے۔ برائے مہربانی آپ اس ظلم کو روک لاکھوں غریبوں NEPRA رہے ہیں۔ کی دعائیں حاصل کریں شکریہ۔ جزاک اللہ۔

Added DG ✓
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TA OAJ OAJ-I OAJ-II

Registrar

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For kind information, please,

Chairman 2. M (Tech)
M (Law) M (Dev)

31
1.1.26

NEPRA
Licensing Department
Diary No. 12
Date: 31-12-25

CHAIRMAN
By No. 7504
Date: 31-12-25

Chairman NEPRA

From: shahid kemc <medicalkemc@gmx.com>
Sent: Wednesday, December 31, 2025 10:36 AM
To: chairman@nepra.org.pk
Subject: Net billing policy 2025

--Request for existing net metering license holders, 1 unit to 1 unit return back of exported units (and not return of units on govt rates) should be retained as here to fore

Thanks

Sent with GMX Mail app

Registrar

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For kind information, please.

☒ Chairman ☒ M (Tech)
☒ M (Law) ☒ M (Dev)

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32

NEPRA
Licensing Department
Copy No. 11/26
Date: 25/12/25

CHAIRMAN
By No. 7507
Date: 31-12-25

Chairman NEPRA

From: Muhammad Rashid Shafi <consultrashid@gmail.com>
Sent: Thursday, December 25, 2025 1:37 PM
To: Chairman@nepra.org.pk
Subject: Protection of Consumer Rights in Relation to Solar Energy Investments

Dear Sir,

NEPRA is entrusted with the responsibility of safeguarding the rights and interests of electricity consumers. It is respectfully submitted that consumers who have invested substantial resources in solar energy infrastructure should not be placed at a disadvantage after having done so in good faith particularly when such investments were encouraged to help mitigate the country's persistent electricity shortages and prolonged load-shedding.

Penalizing or unduly burdening these consumers undermines the very objective of promoting renewable energy and discourages future participation in national energy solutions. A stable and predictable regulatory environment is essential to sustain public confidence and long-term investment.

It is therefore urged that market forces be allowed to operate fairly and adjust naturally to evolving dynamics, rather than shifting additional financial or regulatory burdens onto consumers who have proactively contributed to energy resilience.

Yours sincerely,
Aminah Rashid/Muhammad Rashid Shafi

367/13, Street-4, Block-K, Phase-6, DHA, Lahore

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ADJ. DIR. GEN. SEC.
CHAIRMAN
25-12-25

NEPRA
Licensing Department
Copy No. 116
Date: 2-1-26

Registrar

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For kind information, please.

☒ Chairman 2. M (Tech)
☒ M (Law) ☒ M (Dev)

38
1.1.26

CHAIRMAN
Dy No. 7380
Date: 29-12-25

Registrar

From: A.Suleman Italtec <asuleman.italtec@gmail.com>
Sent: Tuesday, December 30, 2025 6:38 PM
To: Registrar@nepra.org.pk; Chairman@nepra.org.pk; cad@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Mrs. Riffat Anwer

NEPRA

Licensing Department

Copy No. 107

Date: 2-1-26

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For kind information, please.

☒ Chairman ☒ M (Tech)
☒ M (Law) ☒ M (Dev)

112
1-1-26

Chairman NEPRA

From: Mir Anwar Shahzad <shahzad.anwar77@gmail.com>
Sent: Thursday, December 25, 2025 9:31 AM
To: cad@nepra.org.pk
Cc: Chairman@nepra.org.pk; registrar@nepra.org.pk
Subject: Net billing vs net metering

Respected Sir,

This is all over the social media that NEPRA is ready to launch new Net Billing Policy (end of Net Metering) with effect from 14 Jan 26. New policy will be applicable to both new and old licensees, except the purchase rate which will be Rs. 27 for old users and Rs. 11.5 for new users. New policy has been posted at NEPRA website.

First please confirm either the above information is true and authentic.

Secondly I would humbly suggest that at least exempt old Net metering users from this policy till the end of their respective agreement dates. Because implementation of such policies have multi folds impact on the users, society and the industry.

There was a time that government was encouraging or and was giving incentives to general public to shift towards the alternative energy. Now since we have shifted we are gonna penalized in ine way or the other.

Many like me have installed the solar energy systems on loans or on installments. How will we survive if we have to pay installments and electricity bills, under new policy, in parallel?

You are once again requested to reconsider the policy and to exempt existing net metering user from this new policy till the end of their respective agreements.

Regards

Mir Anwar Shahzad

Registrar

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For kind information, please.

☒ Chairman ☒ 2. M. Tech.
☒ M. (Law) ☒ M. (Dev)

86
1.1.26

CHAIRMAN
By No. 7376
Date: 29-12-25

NEPRA
Licensing Department
Copy No. 108
Date: 2-1-26

Chairman NEPA

From: Muhammad Tahir <dr.tahir1957npt@gmail.com>
Sent: Thursday, December 25, 2025 9:17 AM
To: Chairman@nepra.org.pk

To finish net metring cruelty from govt who make law for their benefits but to squeeze public already in crisis

✓
[Stamp: RECEIVED, CHAIRMAN, NEPA, 25 DEC 2025, 10:00 AM]

~~[Signature]~~
~~[Signature]~~

Forwarded please:

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For kind information, please.

☒ Chairman ☒ M (Tech)
☒ M (Law) ☒ M (Dev)

Registrar

1. 1. 62
26

CHAIRMAN
Dy No. 7375
Date: 29-12-25

NEPA
Licensing Department
Dy No. 7375
Date: 29-12-25

Chairman NEPRA

From: Abdul Razaq <arazaqandco1@gmail.com>
Sent: Friday, December 26, 2025 12:08 AM
To: Chairman@nepra.org.pk
Subject: Fwd: Objections to NEPRA (Prosumer) Regulations, 2025 – Replacement of Net Metering with Net Billing

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----- Forwarded message -----

From: Abdul Razaq <arazaqandco1@gmail.com>
Date: Thu, Dec 25, 2025 at 11:46 PM
Subject: Objections to NEPRA (Prosumer) Regulations, 2025 – Replacement of Net Metering with Net Billing
To: <registrar@nepra.gov.pk>

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Dear Sir,

I am writing as a domestic electricity consumer and solar prosumer to formally record my serious concerns and objections regarding the proposed shift from **Net Metering** to **Net Billing** under the NEPRA (Prosumer) Regulations, 2025.

While I fully appreciate NEPRA's responsibility to ensure grid stability and long-term sector sustainability, the replacement of net metering with net billing is, in my view, **economically unjustified, regressive for consumers, and counter-productive to Pakistan's renewable energy objectives.**

1. Severe Erosion of Consumer Economics

Under net billing, exported units are credited at the *National Average Energy Purchase Price*, while imported units are billed at the *full applicable consumer tariff*, inclusive of capacity charges, taxes, and surcharges. This asymmetry fundamentally destroys the financial viability of rooftop solar investments. Consumers made long-term investment decisions in good faith based on net metering economics, and a sudden policy reversal significantly undermines regulatory credibility.

2. Discouragement of Renewable Energy Adoption

Pakistan faces chronic fuel import dependence, circular debt, and peak-hour shortages. Distributed solar under net metering directly reduces peak demand, transmission losses, and foreign exchange outflows. Net billing materially lengthens payback periods, discouraging new installations and effectively reversing the momentum achieved over the last decade.

3. Penalizing Self-Consumption Instead of Encouraging It

Net metering rewards efficient self-consumption and grid support. Net billing, on the other hand, penalizes consumers for exporting surplus daytime energy—energy which the grid urgently needs during solar hours—while charging them disproportionately for evening consumption.

4. Inconsistency with Policy Stability and Investor Confidence

Frequent and material changes to settled regulatory frameworks create uncertainty not only for individual consumers but also for installers, financiers, and local manufacturing ecosystems built around rooftop solar. Regulatory stability is essential for long-term planning and capital formation.

5. Alternative Solutions Exist Without Abolishing Net Metering

If NEPRA's concerns relate to grid stress or cross-subsidization, these can be addressed through:

- Time-of-Use based net metering adjustments
- Export caps aligned with sanctioned load
- Gradual grandfathering mechanisms
- Differential treatment for large commercial installations

6. Commercial vs Residential Net Metering

NEPRA must analyse, figure out and evaluate the consumption and impact of commercial and residential net metering separately and devise strategic and policy parameters for both segments separately. Commercial segments financial earning, net metering capacity, annual consumption and huge impact on the National grid would be much higher than the residential segment results. Devise policy without any change to the residential segment to save a common man from any undue and surprising burden which is matchless with the commercial sector.

A complete replacement of net metering with net billing is a blunt instrument that disproportionately harms small and middle-class consumers.

Request

In light of the above, I respectfully request NEPRA to:

- **Retain intact the same net metering framework as the primary framework** for rooftop solar consumers at least for the Residential sector of the country to provide safeguard to a common man and to keep inflation rate low
- Ensure **grandfathering protection** for existing and pipeline installations
- Engage stakeholders to introduce **refined, balanced adjustments** rather than an outright replacement
- Support Solar energy as a long term strategy to say goodbye to the heavy financial burdens of IPPs.

Pakistan urgently needs strategic policies that encourage energy efficiency, self-generation, and reduced grid burden. Net metering has demonstrably contributed to these objectives and should be strengthened—not dismantled. Moreover Government should initiate necessary steps to address the actual cause of this issue. Agreements with IPP's should discourage & discontinue at the least possible time to minimize loss of revenue and a long term strategy should be devised to stop such kind of stupid agreements which were made with IPP's in the past. We have to learn lessons from the past and ensure not to repeat the same mistake in future. At that point the cost of those agreements, which were made with IPP's, should not be charged to solar consumers. The proposed system of net billing is against the basis of Justice, as there is no justification to purchase a thing at Rs 1 and sell the same thing at the same time at Rs.3.

Thank you for considering this submission.

Yours sincerely,

Name.

Abdul Razaq Khan
211 Johar Block Sector E

Bahria Town Lahore

Pakistan.

cell No 031318198740

Chairman NEPRA

From: primage netmetering <primagenetmetering@gmail.com>
Sent: Wednesday, December 31, 2025 12:16 PM
To: cad@nepra.org.pk; info@nepra.org.pk; registrar@nepra.org.pk
Cc: Chairman@nepra.org.pk; aslam.primage@gmail.com
Subject: Complaint Regarding Non-Acceptance of Net Metering Applications
Attachments: WhatsApp Image 2025-12-31 at 11.00.37 AM.jpeg

Dear Sir,

I would like to file a complaint regarding the non-acceptance of new net metering applications by the concerned sub-divisions and MIRAD of DISCOs.

Despite NEPRA's official directions issued vide the attached letter, the sub-divisions are still refusing to accept net metering applications, which is causing serious inconvenience to consumers.

I kindly request NEPRA to take immediate notice of this issue and ensure compliance with its directives.

Thank you for your support.

Regards,

Primage Pvt Ltd

✓	✓	✓	✓
Adl. DG	Dir	Adl. Dir	DD-I
AD-I	RO	PS	E/S
TA	CA	OA-II	OA-III

Forwarded please:

☒ For immediate action ☐ For information

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 195
Date: 31-12-25

CHAIRMAN
7514
By No. 31-12-25
Date: 31-12-25

Registrar

From: mahmud tariq <architecttariq03@gmail.com>
Sent: Wednesday, December 31, 2025 1:38 PM
To: registrar@nepra.org.pk

The new proposed policy is entirely breach of contract, deviation of the government commitment and policy for clean energy sufficiency, and only to protect the IPPs and its beneficiaries investors..No investor in future will trust this government any policy. We are totally against proposed policy changes in any form. Close the IPP chapter and save the nation.

ADG	✓	Adm. Dir.	CC-
AOH		PS	ES
SA		QA	QA-III

[Handwritten signature]

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01.01.26

Forwarded please:

☒ For action ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please,
 ✓ Chairman 2. M (Tech)
 ✓ M (Law) ✓ M (Dev)

NEPRA

Licensing Department
 Diary No. 104
 Date: 2-1-26

1.10.26
 10
 10

Registrar

From: Humair Saeed <chaudhryhumair00@gmail.com>
Sent: Wednesday, December 31, 2025 3:05 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town lahoreConsumers

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town lahoreConsumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (.....) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Uzair Saeed Chaudhry

house 353, block overseas b extension Bahria town lahore

NEPRA
Licensing Department
File No. 103
2-1-26

Adl. DG I	AD-I	AD-II	AD-III
TA	OA-I	OA-II	OA-III

Forwarded please:	
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information, please.
Chairman 2. M (Tech)
2. M (Law) 2. M (Dev)

1.1.26

Chairman NEPRA

From: asma sufi <asmasufi34@gmail.com>
Sent: Tuesday, December 30, 2025 6:38 PM
To: cad@nepra.org.pk; Chairman@nepra.org.pk
Subject: New Billing

Dear Sir,

It is with a certain amount of trepidation to read about this new proposed billing initiative. Years ago power load shedding sent the people scampering for alternate solutions so as to conduct their work.

UPS/generators (who could afford)

became the need of the hour. Years later the birth of the solar panel offered untold relief.

Not everyone could afford this luxury so beg, borrow or take loans.

My question is as a tax paying, law abiding Pakistani citizen not be allowed to live comfortably, it has now been over 75 years and we are still hankering after bare necessities of life, if we, as middle class families, have taken the initiative to go after clean energy as also being encouraged by the state. This would be an added burden on those households who have struggled financially to install Solar Panel .

Sincerely,

Asma Sufi
Retired senior citizen

Adtl DG	✓	Adtl Dir	DD-I
ADM	✓	PS	S/S
CA	✓	CA-II	CA-III

Registrar

Forwarded please:

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For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> M (Tech)
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29
1.1.26

CHAIRMAN
DY No. 7562
Date: 31-12-25

NEPRA

Licensing Department

Diary No. 601

Date: 20/12/26

Registrar

From: Nafees Najmi <nafeesnajmi@yahoo.com>
Sent: Wednesday, December 31, 2025 12:07 PM
To: registrar@nepra.org.pk
Subject: Objection to draft NEPRA (Prosumer) Regulations, 2025

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

On this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible. Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Nafees Ahmed Najmi
Air Vice Marshal (Retd)

Net Metering Approval No.
NMA 275/2025 [IESCO Gangal Sub Division]

House No 6,
Central Avenue (RMB)
Fazaia Housing Scheme
Rawalpindi -46330
000-9555133)

Sent from Yahoo Mail for iPhone

Adm. DG:	✓	Adm. Dir.:	DD:
AD-H	RO	PS	ES
CA-I	CA-II	CA-III	

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/RCM)

For kind information, please,

✓ Chairman 2. M (Tech)
✓ M (Law) ✓ M (Dev)

NEPRA

Licensing Department

File No. 1.5.2

Date: 2-1-26

For immediate action <input checked="" type="checkbox"/> For information <input type="checkbox"/>	
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<input type="checkbox"/> DG (ITC)	<input type="checkbox"/> DG (Int.)
<input checked="" type="checkbox"/> SA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (EHEC)

For kind information, please.

For ~~any~~ information, please

Addl. DGI	00	Addl. Dir	DD-I
ADM	00	PS	SC
TA	QA-I	QA-II	QA-III

~~Registrar~~

CHAIRMAN
By No. 7503
Date: 24-12-25

1-20

NEPRA
Licensing Department
Diary No. 97
2-1-26
s. 11(3)

The proposal to replace Net Metering with Net Billing (Gross Metering) will effectively kill the incentive for solar adoption in Pakistan. Net metering is not a burden on the national energy system; rather, it provides decentralized generation that reduces the need for expensive fuel imports. The "burden" frequently cited is merely a reduction in the unjustifiable profits of inefficient Independent Power Producers (IPPs). Net metering must continue in its original form to ensure a sustainable energy transition.

The proposed buy-back rate based on the National Average Energy Purchase Price (approx. Rs. 11-13) is illogical and discriminatory. This average is artificially lowered by including cheap, legacy Hydropower, which has no technical or economic relevance to the cost of private solar generation.

Demand: The buy-back rate should be pegged to the average unit price paid to IPPs, as solar prosumers are effectively performing the same function as these private generators but without demanding "Capacity Payments."

If the government claims the national average cost of energy is only ~Rs. 11 per unit, it is indefensible that consumers are being charged five times that amount. The Authority must explain why billions are being paid to IPPs for electricity that is never produced (Capacity Payments) while taxing prosumers

for the electricity they do produce. Consumer tariffs must be rationalized to reflect actual generation costs plus reasonable maintenance and line losses.

4. Solar Capacity vs. Sanctioned Load

The draft's attempt to cap solar capacity strictly at 100% of the sanctioned load is a regressive step. Solar panels operate at varying efficiencies depending on the weather; therefore, the current formula of 1.5 times the sanctioned load must be maintained to allow prosumers to meet their actual energy needs throughout the year.

5. Termination of Inefficient IPP Contracts

National policy should benefit the public, not a handful of influential IPP owners. We have reached a point of "Excess Production Capacity" where the common man is being robbed to pay for idle plants.

NEPRA must stop acting as an advocate for IPPs and instead focus on revising IPP agreements, eliminating the "Capacity Payment" clauses, and immediately terminating contracts with inefficient plants that survive solely on state-mandated "kickbacks."

No new IPP licenses should be sanctioned given the existing surplus.

Public Interest and Moral Responsibility

Solar prosumers should be treated as partners in the "Green Revolution," not as offenders or a "financial burden." The current draft suggests a collusion between the power division bureaucracy and IPP lobbies to protect rent-seeking behavior at the expense of the Pakistani nation.

Conclusion: I urge NEPRA to protect the rights of the 250 million Pakistanis over the interests of a few dozen IPPs. The proposed regulations must be redrafted to favor renewable energy growth and public relief.

Yours sincerely,

Iftikhar Hussain Shah

CNIC: 61101-1971259-9

H. No 30, Street No 19,
Sector B, DHA 2, Islamabad

Date: December 30, 2025

Chairman NEPRA

From: A.Suleman Italtel <asuleman.italtec@gmail.com>
Sent: Tuesday, December 30, 2025 6:38 PM
To: Registrar@nepra.org.pk; Chairman@nepra.org.pk; cad@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

“Misc.Charges” routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Mrs. Riffat Anwer

H.No. 332, St. 100, E-11/1 FFC, IS,
Islamabad

NEPRA
Licensing Department
Dy No. 246
Date: 21-12-25

Registrar

22
1.1.26

Asst. DG	Asst. Dir	DD-I
ADH	IS	ES
TA	CA-I	CA-II

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For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> 2. M (Tech)
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21.10.26

CHAIRMAN
Dy No. 7501
Date: 31-12-25

Tel: 03320942057

Email: asuleman.italtec@gmail.com

Consumer No. 1140201594

Chairman NEPRA

From: sadiqa nakhat <sadiqanakhat50@yahoo.com>
Sent: Wednesday, December 24, 2025 11:10 PM
To: registrar@nepra.org.pk
Cc: cad@nepra.org.pk; chairman@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on Bahria town Lahore Consumers

The Registrar
(NEPRA)
Islamabad

Dear Sir,
Assalamu Alikum

Forwarded please:

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For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> 2. M (Tech)
<input checked="" type="checkbox"/> 3. M (Law)	<input checked="" type="checkbox"/> 4. M (Dev)

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. As a retired senior citizen, I made a compulsory saving for 5 years and installed solar system in the month of July 2025. Reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of wapda/ Bahria Town Lahore management I am already adversely affected by:

- 1) Arbitrary deduction/reduction of solar export units
- 2) Illegal charges imposed under the guise of tariff adjustments, and
- 3) "Misc. Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

I am also an active taxpayer even after a retirement of 9 years and I have yet to reap any fruits of my dutifulness and loyalty towards my country.

In this background, the proposed draft regulations will further aggravate the financial exploitation of many solar consumers from different financial backgrounds, such as me, who is the sole breadwinner of my household through my pension only. The proposed agenda aims to use prosumers to reduce inefficiencies, losses, theft, and poor revenue recovery by distribution companies, which would otherwise negatively affect us, the consumers.

Such an approach is UNJUST, DISCRIMINATORY, and contrary to the objectives of renewable energy promotion, regulatory system, certainty of economic use and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices.
These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Sadiqa Nakhat

205, Bahria Homes, Sector E, Bahria Town, Lahore, Mohlanwal Road. 53720.
WhatsApp: 03303110044.

Registrar

1.1.26

69
DY No. 7373
Date: 29-12-25

CHAIRMAN

NEPRA

Licensing Department
Copy No. 2-1-26

Chairman NEPRA

From: ather iqbal <ather_ffc@hotmail.com>
Sent: Thursday, December 25, 2025 10:55 PM
To: Chairman@nepra.org.pk; Registrar@nepra.org.pk
Subject: New Draft Solar Billing Policy

Respected Sir,

This refers to NEPRA public notice regarding invitation of comments on the subject.

I hereby submit my comments that as per contract done by NEPRA, old solar power producers **should be exempted** from new policy of gross metering for the contract period and that the subject contracts to be respected in all sense.

Yours respectfully

Ather

Sent from my iPhone

RECEIVED
26 DEC 2025 10:55 PM
REGISTRAR
NEW DRAFT SOLAR BILLING POLICY

Registrar

Forwarded please:

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For kind information, please.

✓ Chairman 2. M (Tech)
✓ M (Law) 4. M (Dev)

1.1.26
71

CHAIRMAN
Dy No. 7394
Date: 29-12-25

Chairman NEPRA

From: Abbas Ali Cheema <aacheema64@gmail.com>
Sent: Thursday, December 25, 2025 1:43 AM
To: Chairman@nepra.org.pk

Protest against new proposals of net Billing of Solar users,

Dear sir,

I want to register my Protest against new proposed government solar policy. Millions of people of my country acted upon to install solar for the domestic use, because they could not afford to pay very heavy price of electricity which are abouts 50 to 60 Rs per unit. We install solar by using our hard savings because government encourages us to produce and use clean energy through net metering. The rates of this electricity were fixed Rs 27 per unit for extra units produced which were to be used by solar installer at night.

Now in proposed policy the same government is discouraging its previous policy of solarization and rates of per unit are also being reduced to around Rs 11. Further more net / grass Billing is also being proposed. Agai further agreement time is also being reduced.

I am astonished and fail to understand any logic and sense that how our government back up from its own policy of encouraging to discouraging?

Why the government is discouraging cleaner energy over fossilised energy ?

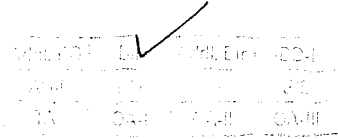
Why government is focusing Millions of poor people like me to purchase costly electricity from IPPs

I STRONGLY PROTEST TO IMPLEMENT THE NEW PROPOSALS AND REQUEST THE NEPRA AUTHORITIES TO REJECT THE GOVERNMENT'S NEW PROPOSALS AND CONTINUE WITH PREVIOUS POLICY TO SAVE HUNDREDS OF MILLIONS POOR PEOPLE FROM THIS UNJUST BRUTAL DECISION OF GOVERNMENT.

I hope and pray that better sense will prevail and NEPRA will NOT APPROVE the said proposals.

With best wishes and thanks,

Lt Col Abbas Ali Cheema (Retd) Rawalpindi Cantt.



Registered

Forwarded please:

☒ For action ☐ For information

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For kind information, please.

☒ Chairman ☒ M (Tech)
☒ M (Law) ☒ M (Dev)

NEPRA
Licensing Department
Copy No. 83
Date: 2-1-26

1-1-26
68

CHAIRMAN
By No. 7374
Date: 29-12-25

Chairman NEPRA

From: Amir Naveed <ankhankhan67@gmail.com>
Sent: Friday, December 26, 2025 5:39 PM
To: Chairman@nepra.org.pk

AoA, we have spend so much amount to install solar system. It's not fair u ppl change the rates. Pl let the unit shd remains as it was.
Thanks and Regards.

✓
Registrar

Forwarded please:

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For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> 2. M (Tech)
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NEPRA
Licensing Department
Diary No. 82
Date: 2-1-26

102
1.1.28

CHAIRMAN
DY No. 7405
Date: 29-12-25

Chairman NEPRA

From: Aurangzeb Haque <aurangzebhaque@yahoo.com>
Sent: Friday, December 26, 2025 4:51 PM
To: Chairman@nepra.org.pk
Subject: Comments on upcoming solar net/gross metering

Dear Chairman sb,
Salaams.

I am writing to comment on two issues related to the new gross metering policy, to be introduced shortly for new Solar users.

1. Gross metering requires separately measuring power inflow and outflow at the consumer end. My question is:- do the utility companies have GREEN METERS that measure SEPARATELY, power flow based upon DIRECTION. Current meters do not have that capability. To my knowledge such meters maynot be cost effective and may require manufacturing which may delay grant of new licences which are already blocked for more than a month by DISCOs. Secondly the consumer will have to bear the cost which is unfair because policy is being changed by Govt./NEPRA. Fairness demands that these should be supplied free of charge to renewal cases.
2. Secondly it may also require a new kind of solar inverter at the consumer end which has the capability of managing imported and exported power separately. Currently installed commonly available inverters may not have this ability. This again raises the issue of cost particularly for renewal cases.

I hope that NEPRA will have these aspects examined thoroughly to protect the interest of consumers.

Regards

Aurangzeb Haque

WhatsApp 03020050060

Yahoo Mail: Search, organise, conquer

NEPRA
Licensing Department
Date: 2-1-26

Forwarded please:

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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (CTRM)

For kind information, please.

Chairman 2. M (Tech)
2. M (Law) 4. M (Dev)

Chairman NEPRA

From: Tariq Malik <tariqmalikzzz7579@gmail.com>
Sent: Thursday, December 25, 2025 7:08 PM
To: Chairman@nepra.org.pk
Subject: Net Metering Policy

The latest net-metering policy drafted by NEPRA under the Prosumer Regulations, 2025 represents a troubling retreat from meaningful support for rooftop solar adopters. This is not at all acceptable as the already over burden tax payers will further be suppressed by the implementation of this non favorable policy.... we condemn this.

Registrar

PA

Forwarded please:

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTBCM)

For kind information, please.

☒ Chairman ☒ 2. M (Tech)
☒ 2. M (Law) ☒ 2. M (Dev)

1.1.26
80

CHAIRMAN
By No. 7385
Date: 24-12-25

NEPRA
Licensing Department
Policy No. 90
Date: 2-1-26

Chairman NEPRA

From: ali hamdani <alihamdani63@gmail.com>
Sent: Thursday, December 25, 2025 9:12 PM
To: Chairman@nepra.org.pk
Subject: Change in Solar policy

It has come to notice through media about the subject. It is surprising to know that unilateral actions and decisions being taken without consulting the users. Most of the people converted to solar systems and net metering after the government gave the policy but it is surprising to note that every now and then government keep changing the stance which is against the commitments and rules given by government. Therefore please stop making excuses by making charges without the consent of users and going against the laws and rules.
Sent from my iPhone

RECEIVED
12/25/2025 9:12 PM
FROM: ali hamdani <alihamdani63@gmail.com>
TO: Chairman@nepra.org.pk
SUBJECT: Change in Solar policy

NEPRA
Licensing Department
Diary No. 79
Date: 2-1-26

Registrar

Forwarded please:

<input checked="" type="checkbox"/> For info action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Inf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (TCOM)

For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> Z. M (Tech)
<input checked="" type="checkbox"/> M (Law)	<input checked="" type="checkbox"/> M (Dev)

74
1-1-26

CHAIRMAN
Dy No. 7391
Date: 29-12-25

Chairman NEPRA

From: Hameedullah Khattak <khanewalseed@gmail.com>
Sent: Thursday, December 25, 2025 8:56 PM
To: Chairman@nepra.org.pk
Subject: Request to Honor Existing Net Metering Agreements

To

The Honourable Chairman

National Electric Power Regulatory Authority (NEPRA)

Respected Sir,

Registered

Forwarded please:	
<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> ADG (Tt)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> SLA	<input type="checkbox"/> DG (fin)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (HQM)	

For kind information, please:
☒ Chairman ☒ Z. M. (Tech)
☒ M. M. (Law) ☒ M. M. (Dev)

Date: 29-12-25

76
1.1.26
By No. 7389
CHAIRMAN

I respectfully submit that I am a WAPDA net metering consumer, and approximately two years ago I obtained a net metering connection under the tariff-based agreement duly approved and regulated by NEPRA at that time.

It has recently been reported through various sources that a revised net metering policy is under consideration, and that its provisions may also be applied to existing consumers who are already bound by valid and subsisting agreements. This has caused serious concern among existing net metering consumers, including myself, as our agreements are still well within their contractual duration.

Relying on the prevailing policy framework and the approved agreement, we invested substantial amount of capital, amounting to millions of rupees to install solar power systems. Any retrospective application of a new policy on existing agreements would not only undermine investor confidence but also result in unjust financial loss, effectively rendering our investments unviable.

It is therefore humbly requested that all existing net metering agreements be allowed to continue until their completion in accordance with the terms originally approved, and that any new or revised policy be applied strictly to new connections only. Such an approach would uphold the principles of contractual sanctity, fairness, and regulatory consistency.

I further request that this representation and protest be placed before the competent authority and given due consideration in the larger public interest.

Thanking you in anticipation of a just and equitable decision.

Yours sincerely,

Hameedullah Khattak

Chairman NEPRA

From: Tahir Cheema <tcheema69@googlemail.com>
Sent: Wednesday, December 24, 2025 7:20 PM
To: Chairman@nepra.org.pk
Subject: Solar net metering

Respected Sir

We strongly condemn the news about net metering policy change.

I am more than sixty years old and spent hundreds of thousands of my savings on getting my solar system and net metering thinking it will save us from hefty electricity bills but unfortunately all our investment will go in drain if old solarization policy of net metering is changed.

We request your immediate attention to this serious matter sir.

Kind regards

Muhammad Tahir Javed

0300-8568790 tcheema69@gmail.com

Net metering consumer

Registrar

Forwarded please:

<input checked="" type="checkbox"/> For rec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADP (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please.

☒ Chairman 2. M (Tech)
☒ M (Law) 4. M (Dev)

1. 1. 26
88

CHAIRMAN
By No. 1369
Date: 29-12-25

NEPRA
Licensing Department
Diary No. 81
Date: 2-1-26

Chairman NEPRA

From: Shakil Q Shakil <shakmech@gmail.com>
Sent: Wednesday, December 24, 2025 9:54 PM
To: Chairman@nepra.org.pk
Subject: NetMetering policy

The ipps r allowed capacity charges which is the basic of excess production or over expenses in elect generation. Instead of treating the issue , hunting down Netmetering can b political decision but should not b a regulators choice. By all logic and standards it is unfair, unjust and poor decision. May Allah blesses us all and bestows upon us His guidance.

Sent from my iPhone

Forwarded please:

<input checked="" type="checkbox"/> For decision	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECON)

For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input type="checkbox"/> 2. M (Tech)
<input type="checkbox"/> 3. M (Law)	<input checked="" type="checkbox"/> 4. M (Dev)

Registrar

NEPRA
Licensing Department
Diary No. 82
Date: 2011-26

CHAIRMAN
By No. 7372
Date: 29-12-25

Chairman NEPRA

From: Tarique Mahmood <tarique.bahriatown@gmail.com>
Sent: Wednesday, December 24, 2025 8:15 PM
To: Chairman@nepra.org.pk
Subject: Change in Net Metering Policy

Very poor policy change. Will hurt the public at large. Regards Sent from my iPhone

Forwarded phrase: ☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (TTL)	<input type="checkbox"/> DG (File)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (ICBM)

For kind information, please.
☒ Chairman ☐ M (Tech)
☒ M (Law) ☐ M (Dev)

Registrar

CHAIRMAN
By No. 7371
Date: 29-12-25

Chairman NEPRA

From: Atif Butt <atifbutt34@gmail.com>
Sent: Friday, December 26, 2025 12:28 AM
To: Chairman@nepra.org.pk
Subject: Fw: Atif Butt shared a file with you
Attachments: Reply to Nepra on Net Billing.docx

Pfa.

Regards
Atif

Sent from my phone

----- Original message -----

From: Atif Butt <atifbutt34@gmail.com>
Date: Fri, 26 Dec 2025, 12:01 am
To: registrar@nepra.gov.pk
Subject: Atif Butt shared a file with you

Please find the attached file.

Regards
Atif

Sent from my phone

Forwarded please:

☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (L&E)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> C&LA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTICM)

For kind information, please.

☒ Chairman 2. M (Tech)
☒ M (Law) 4. M (Dev)

Registrar

1.1.26
93

CHAIRMAN
By No. 7396
Date: 29-12-25

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Subject: Objections to NEPRA (Prosumer) Regulations, 2025 – Replacement of Net Metering with Net Billing

Dear Sir,

I am writing as a domestic electricity consumer and solar prosumer to formally record my serious concerns and objections regarding the proposed shift from **Net Metering** to **Net Billing** under the NEPRA (Prosumer) Regulations, 2025.

While I fully appreciate NEPRA's responsibility to ensure grid stability and long-term sector sustainability, the replacement of net metering with net billing is, in my view, **economically unjustified, regressive for consumers, and counter-productive to Pakistan's renewable energy objectives.**

1. Severe Erosion of Consumer Economics

Under net billing, exported units are credited at the *National Average Energy Purchase Price*, while imported units are billed at the *full applicable consumer tariff*, inclusive of capacity charges, taxes, and surcharges. This asymmetry fundamentally destroys the financial viability of rooftop solar investments.

Consumers made long-term investment decisions in good faith based on net metering economics, and a sudden policy reversal significantly undermines regulatory credibility.

2. Discouragement of Renewable Energy Adoption

Pakistan faces chronic fuel import dependence, circular debt, and peak-hour shortages. Distributed solar under net metering directly reduces peak demand, transmission losses, and foreign exchange outflows.

Net billing materially lengthens payback periods, discouraging new installations and effectively reversing the momentum achieved over the last decade.

3. Penalizing Self-Consumption Instead of Encouraging It

Net metering rewards efficient self-consumption and grid support. Net billing, on the other hand, penalizes consumers for exporting surplus daytime energy—energy which the grid urgently needs during solar hours—while charging them disproportionately for evening consumption.

4. Inconsistency with Policy Stability and Investor Confidence

Frequent and material changes to settled regulatory frameworks create uncertainty not only for individual consumers but also for installers, financiers, and local manufacturing ecosystems built around rooftop solar. Regulatory stability is essential for long-term planning and capital formation.

5. Alternative Solutions Exist Without Abolishing Net Metering

If NEPRA's concerns relate to grid stress or cross-subsidization, these can be addressed through:

- Time-of-Use based net metering adjustments
- Export caps aligned with sanctioned load
- Gradual grandfathering mechanisms
- Differential treatment for large commercial installations

6. Commercial vs Residential Net Metering

NEPRA must analyse, figure out and evaluate the consumption and impact of commercial and residential net metering separately and devise strategic and policy parameters for both segments separately. Commercial segments financial earning, net metering capacity, annual consumption and huge impact on the National grid would be much higher than the residential segment results. Devise policy without any change to the residential segment to save a common man from any undue and surprising burden which is matchless with the commercial sector.

A complete replacement of net metering with net billing is a blunt instrument that disproportionately harms small and middle-class consumers.

Request

In light of the above, I respectfully request NEPRA to:

- **Retain intact the same net metering framework as the primary framework** for rooftop solar consumers at least for the Residential sector of the country to provide safeguard to a common man and to keep inflation rate low
- Ensure **grandfathering protection** for existing and pipeline installations
- Engage stakeholders to introduce **refined, balanced adjustments** rather than an outright replacement
- Support Solar energy as a long term strategy to say goodbye to the heavy financial burdens of IPPs.

Pakistan urgently needs strategic policies that encourage energy efficiency, self-generation, and reduced grid burden. Net metering has demonstrably contributed to these objectives and should be strengthened—not dismantled.

Thank you for considering this submission.

Yours sincerely,

Name.

Consumer
Pakistan

/

Prosumer

Chairman NEPRA

From: Arif Javed <ajaved@me.com>
Sent: Friday, December 26, 2025 3:15 PM
To: Chairman@nepra.org.pk
Subject: New policy for solar energy users.

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

Regards,

Arif Javed

Forwarded please

☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADC (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CBGM)

For kind information, please.

☒ Chairman 2. M (Tech)
☒ M (Law) 4. M (Dev)

CHAIRMAN
By No. 7401
Date: 29-12-25

Chairman NEPRA

From: aamir siddiqui <m2aamirsiddiqui@yahoo.com>
Sent: Friday, December 26, 2025 3:43 PM
To: Chairman@nepra.org.pk
Subject: New billing policy effective 14/01/26

New billing policy i. e end of net metering is not acceptable, we have spent millions of rupees in installing solar systems and now Govt instead of purchasing our export on higher rates is slashing already approved rates which are not even compatible to what is prevalent in the other countries as they purchase electricity from solar consumers on higher rates whereas in our country it is opposite.

So please re consider your decision in the best interest of your citizens.

Regards

Yahoo Mail: Search, organise, conquer

Registrar

(Signature)

Forwarded please:

☒ For p.c. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECM)

For kind information, please.

☒ Chairman ☒ 2. M (Tech)
☒ 3. M (Law) ☒ 4. M (Dev)

NEPRA
Licensing Department
Copy No. 86
Date: 26.12.26

1.1.26
99

CHAIRMAN
Dy No. 7402
Date: 29-12-25

Chairman NEPRA

From: Azhar Hashmi <azharmhashmi@gmail.com>
Sent: Friday, December 26, 2025 4:28 PM
To: Chairman@nepra.org.pk
Subject: Objection on new system net billing

✓
2025 DEC 26 PM 4:28
AZHAR HASHMI

Aoa sir.
System of net metering already exists may please not be changed for old user
Thanks

Forwarded please: ☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Elec.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (M&M)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

NEPRA
Licensing Department
Diary No. 87
Date: 2-1-26

100
1.1.26
CHAIRMAN
By No. 7403
Date: 29-12-25

Chairman NEPRA

From: Sohail Khan <sohailkhan40@gmail.com>
Sent: Friday, December 26, 2025 12:29 AM
To: chairman@nepra.org.pk
Subject: Reply to Nepra on Net Billing
Attachments: Reply to Nepra on Net Billing.docx

Please find attached file

Forwarded Please:

<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Inc.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (IT)	<input type="checkbox"/> DG (Fin.)
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Economic)

For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input type="checkbox"/> 2. M (Tech)
<input checked="" type="checkbox"/> 3. M (Law)	<input type="checkbox"/> 4. M (Dev)

~~Register~~

CHAIRMAN
Dy No. 7397
Date: 29-12-25

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Subject: Objections to NEPRA (Prosumer) Regulations, 2025 – Replacement of Net Metering with Net Billing

Dear Sir,

I am writing as a domestic electricity consumer and solar prosumer to formally record my serious concerns and objections regarding the proposed shift from **Net Metering** to **Net Billing** under the NEPRA (Prosumer) Regulations, 2025.

While I fully appreciate NEPRA's responsibility to ensure grid stability and long-term sector sustainability, the replacement of net metering with net billing is, in my view, **economically unjustified, regressive for consumers, and counter-productive to Pakistan's renewable energy objectives.**

1. Severe Erosion of Consumer Economics

Under net billing, exported units are credited at the *National Average Energy Purchase Price*, while imported units are billed at the *full applicable consumer tariff*, inclusive of capacity charges, taxes, and surcharges. This asymmetry fundamentally destroys the financial viability of rooftop solar investments.

Consumers made long-term investment decisions in good faith based on net metering economics, and a sudden policy reversal significantly undermines regulatory credibility.

2. Discouragement of Renewable Energy Adoption

Pakistan faces chronic fuel import dependence, circular debt, and peak-hour shortages. Distributed solar under net metering directly reduces peak demand, transmission losses, and foreign exchange outflows.

Net billing materially lengthens payback periods, discouraging new installations and effectively reversing the momentum achieved over the last decade.

3. Penalizing Self-Consumption Instead of Encouraging It

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Frequent and material changes to settled regulatory frameworks create uncertainty not only for individual consumers but also for installers, financiers, and local manufacturing ecosystems built around rooftop solar. Regulatory stability is essential for long-term planning and capital formation.

5. Alternative Solutions Exist Without Abolishing Net Metering

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- Time-of-Use based net metering adjustments
- Export caps aligned with sanctioned load
- Gradual grandfathering mechanisms
- Differential treatment for large commercial installations

6. Commercial vs Residential Net Metering

NEPRA must analyse, figure out and evaluate the consumption and impact of commercial and residential net metering separately and devise strategic and policy parameters for both segments separately. Commercial segments financial earning, net metering capacity, annual consumption and huge impact on the National grid would be much higher than the residential segment results. Devise policy without any change to the residential segment to save a common man from any undue and surprising burden which is matchless with the commercial sector.

A complete replacement of net metering with net billing is a blunt instrument that disproportionately harms small and middle-class consumers.

Request

In light of the above, I respectfully request NEPRA to:

- **Retain intact the same net metering framework as the primary framework** for rooftop solar consumers at least for the Residential sector of the country to provide safeguard to a common man and to keep inflation rate low
- Ensure **grandfathering protection** for existing and pipeline installations
- Engage stakeholders to introduce **refined, balanced adjustments** rather than an outright replacement
- Support Solar energy as a long term strategy to say goodbye to the heavy financial burdens of IPPs.

Pakistan urgently needs strategic policies that encourage energy efficiency, self-generation, and reduced grid burden. Net metering has demonstrably contributed to these objectives and should be strengthened—not dismantled.

Thank you for considering this submission.

Yours sincerely,

Name.

Consumer
Pakistan

/

Prosumer

Chairman NEPRA

From: Yahoo <singularity863@yahoo.com>
Sent: Friday, December 26, 2025 10:37 AM
To: Chairman@nepra.org.pk
Subject: Soar policy

Policies of the government are disappointing. Look at China how they are developing and using solar energy systems.

IPP have destroyed our country so don't change the solar policy.

Bahria town is already cutting 30% of the solar unit produced due to case taken up with autorties, pending since long and depriving the community of its right.

Don't deprive the people by making your destructiv solar policy who are already serviving in these hard conditions.

: Search, organise, conquer

~~Registrar~~

Forwarded please:

☒ For new action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (Art.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (L.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CI/ECM)

For ~~and~~ information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPA
licensing Document
Primary No. 2-6-26

97
1.1.26

CHAIRMAN
By No. 7400
Date: 29-12-25

Chairman NEPRA

From: Muhammad Jamshaid <muhammad.jamshaid8679@gmail.com>
Sent: Thursday, December 25, 2025 9:39 PM
To: Chairman@nepra.org.pk

Recently much talked about new solar tariff /exchange rate is not at all acceptable. We forcefully emphasized that old policy must be continued as promised. Please don't always cheat the nation ,for God sake.

Handwritten notes and signatures:
- A large handwritten signature "Registration" with a long horizontal line through it.
- A small handwritten note "2-1-26" with an arrow pointing to a stamp.
- A circular stamp with a signature inside.

NEPRA
Licensing Department
Dy No. 73
Date: 2-1-26

Forwarded please

<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Ec.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (TRCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN
Dy No. 73
Date: 29-12-25
1.1.26

Chairman NEPRA

From: Nadeem Aslam <fenadeem@gmail.com>
Sent: Thursday, December 25, 2025 9:59 PM
To: Chairman@nepra.org.pk
Subject: Request to Honour Existing Solar Installation agreement

Dear Sir,
Kindly request that the agreement signed at the time I obtained permission for the installation of my solar systems in 2024 (and earlier) may be honored. I respectfully request that the newly introduced rules not be applied retrospectively to existing consumers.
Thank you for your understanding and cooperation.
Yours sincerely,
Nadeem Aslam

NEPRA
Licensing Department
Diary No. 77
Date: 2-1-26

Forwarded phase:
☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIG)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (TRM)

For kind information, please,
1 Chairman 2 M (Tech)
3 M (Law) 4 M (Dev)

CHAIRMAN
By No. 7393
Date: 29-12-25

Chairman NEPRA

From:

Al Hamra Al Maida <nidahassan2010@gmail.com>

Sent:

Friday, December 26, 2025 5:15 AM

To:

Forwarded please:

☒ For no action

☐ For information

Chairman@nepra.org.pk

Subject:

☒ DG (Pic)

☐ DG (Admin)

Objections to NEPRA (Prosumer) Regulations, 2025- Replacement of Net Metering With Net Billing

☐ SA (M&E)

☐ DG (CAU)

☐ DG (Tech.)

☐ DG (AW)

☐ ADG (TH)

☐ DG (Fin)

☒ SLA

☐ Dir. (LT)

☐ Consult (Tech.)

☐ Consult (ECM)

Dear Sir,

For kind information, please.

Chairman 2. M (Tech)

C. M (Law) 3. M (Dev)

I am writing as a domestic electricity consumer and solar prosumer to formally record my serious concerns and objections regarding the proposed shift from Net Metering to Net Billing under the NEPRA (Prosumer) Regulations, 2025.

While I fully appreciate NEPRA's responsibility to ensure grid stability and long-term sector sustainability, the replacement of net metering with net billing is, in my view, economically unjustified, regressive for consumers, and counter-productive to Pakistan's renewable energy objectives.

1. Severe Erosion of Consumer Economics Under net billing, exported units are credited at the National Average Energy Purchase Price, while imported units are billed at the full applicable consumer tariff, inclusive of capacity charges, taxes, and surcharges. This asymmetry fundamentally destroys the financial viability of rooftop solar investments. Consumers made long-term investment decisions in good faith based on net metering economics, and a sudden policy reversal significantly undermines regulatory credibility.

2. Discouragement of Renewable Energy Adoption Pakistan faces chronic fuel import dependence, circular debt, and peak-hour shortages. Distributed solar under net metering directly reduces peak demand, transmission losses, and foreign exchange outflows. Net billing materially lengthens payback periods, discouraging new installations and effectively reversing the momentum achieved over the last decade.

3. Penalizing Self-Consumption Instead of Encouraging It Net metering rewards efficient self-consumption and grid support. Net billing, on the other hand, penalizes consumers for exporting surplus daytime energy—energy which the grid urgently needs during solar hours—while charging them disproportionately for evening consumption.

4. Inconsistency with Policy Stability and Investor Confidence Frequent and material changes to settled regulatory frameworks create uncertainty not only for individual consumers but also for installers, financiers, and local manufacturing ecosystems built around rooftop solar. Regulatory stability is essential for long-term planning and capital formation.

5. Alternative Solutions Exist Without Abolishing Net Metering If NEPRA's concerns relate to grid stress or cross-subsidization, these can be addressed through:

Time-of-Use based net metering adjustments

Export caps aligned with sanctioned load

Gradual grandfathering mechanisms

Differential treatment for large commercial installations

6. Commercial vs Residential Net Metering

CHAIRMAN
Dy No. 7399
Date: 29-12-25

NEPRA must analyse, figure out and evaluate the consumption and impact of commercial and residential net metering separately and devise strategic and policy parameters for both segments separately. Commercial segments financial earning, net metering capacity, annual consumption and huge impact on the National grid would be much higher than the residential segment results. Devise policy without any change to the residential segment to save a common man from any undue and surprising burden which is matchless with the commercial sector.

A complete replacement of net metering with net billing is a blunt instrument that disproportionately harms small and middle-class consumers.

Request In light of the above, I respectfully request NEPRA to:

Retain intact the same net metering framework as the primary framework for rooftop solar consumers at least for the Residential sector of the country to provide safeguard to a common man and to keep inflation rate low

Ensure grandfathering protection for existing and pipeline installations

Engage stakeholders to introduce refined, balanced adjustments rather than an outright replacement

Support Solar energy as a long term strategy to say goodbye to the heavy financial burdens of IPPs.

Pakistan urgently needs strategic policies that encourage energy efficiency, self-generation, and reduced grid burden. Net metering has demonstrably contributed to these objectives and should be strengthened—not dismantled.

Thank you for considering this submission.

Yours sincerely,

Name.

Nida Irfan

Pakistan Zindabad

Chairman NEPRA

From: John Shepard <vanguard.shepard@gmail.com>
Sent: Wednesday, December 24, 2025 4:37 PM
To: registrar@nepra.org.pk; chairman@nepra.org.pk; cad@nepra.org.pk
Subject: objections to draft NEPRA(Prosumer)

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Rukhsana waqar

[BTPL rukhsana waqar /

[C-7 PROJECT 2-A PRECHS G.IQBAL/ Phase -3phase grid tied
Account 0400004397019.

Forwarded please:

☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Lic)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (TCOM)

For kind information, please.

Chairman 2. M (Tech)
M (Law) M (Dev)

Registrar

From: Ahmar Khan <m.ahmar.khan18@gmail.com>
Sent: Monday, December 29, 2025 9:40 PM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

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As a consumer of (DHA Islamabad)

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Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Muhammad Ahmar Khan

[DHA I Consumer /
House 1, Street 16, Sector A, DHA 2 Islamabad

Forwarded please:

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<input checked="" type="checkbox"/> DG (Ec.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (Tr)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (CICOM)

Kind information, please.

☒ Chairman ☒ M (Tech)
☒ M (Law) ☒ M (Dev)

Registrar

From: Ahmar Khan <m.ahmar.khan18@gmail.com>
Sent: Monday, December 29, 2025 9:33 PM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

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Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

[Muhammad Ahmar Khan]

[BTPL Consumer /

[Address: House 1, Street 16 Sector A, DHA/ Phase 2, Islamabad

Forwarded please:

☒ For action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Economic)

For kind information, please,

✓ Chairman 2. M.Tech)

✓ M (Law) 4. M (Dev)

✓ The Registrar

(NEPRA)

Islamabad

SUBJECT: OBJECTIONS TO DRAFT NEPRA (PROSUMER) REGULATIONS, 2025 – ADDITIONAL ADVERSE IMPACT ON BTPL CONSUMERS

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,


(27.12.2025)

(MUHAMMAD TAHIR KHAN)

74-C HBFC SOCIETY LAHORE.

Ex SE/DIRECTOR PRISONS PUNJAB

Forwarded please:

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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (BTPLM)

For and information, please.

☒ Chairman Z. M. (Tech)
☒ S. M. (Law) ☒ M. (Dev)

NEPRA
Licensing Department
Copy No. 58
Date: 2-1-26

1.1.26
25



Chairman NEPRA

From: Riaz Hussain <riazhusaina1@gmail.com>
Sent: Friday, December 26, 2025 7:16 PM
To: Chairman@nepra.org.pk
Cc: muhammadakhtarabbasi@yahoo.com
Subject: Request for Review/Exemption Under New Net Billing Policy

Dear Sir/Madam,

I am writing as a registered Net Metering user to express concern regarding the newly proposed Net Billing Policy, scheduled to take effect from 14 January 2026.

While we support Pakistan's transition to renewable energy, the proposed policy, particularly the purchase rate of Rs. 11.5/unit for new users and Rs. 27/unit for existing users, will adversely impact existing Net Metering investors who installed systems under the previous policy. These users made long-term financial and environmental commitments based on NEPRA's earlier rules.

We respectfully request that NEPRA:

1. Exempts existing Net Metering users from the new purchase rate, or
2. Revises the policy to provide fair compensation aligned with original Net Metering rates, ensuring financial viability and continued investment in rooftop solar.

We urge NEPRA to consider the significant implications for renewable energy adoption, investor confidence, and Pakistan's green energy goals.

Thank you for your consideration. We hope for a fair and equitable resolution.

Sincerely,

Riaz Hussain

House No.20 Road1 Sector B2 Bahria Enclave

Islamabad

3300 5233144

Registrar

Forwarded please:

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For kind information, please:

☒ Chairman 2. M (Tech)
☒ M (Law) 3. M (Dev)

NEPRA
Licensing Department
Diary No. 49
Date: 2-1-26

CHAIRMAN
Dy No. 7408
Date: 29-12-25

Chairman NEPRA

From: munir tariq <munirtariq@yahoo.com>
Sent: Friday, December 26, 2025 5:42 PM
To: Registrar@nepra.org.pk; Chairman@nepra.org.pk
Subject: Objection to Proposed Net Billing Regulations for Solar Consumers

Dear sir,

I am writing to express my concerns and strong protest against the proposed "net billing regulations for solar consumers". As a residential consumer, I believe the proposed changes may negatively impact the adoption of renewable energy sources. In the new net billing policy, purchase rates of electricity are very very unfair compensation rates, and barrier to renewable energy adoption.

I request NEPRA to consider the interests of at least residential solar consumers by continuing the "net metering policy". Hope NEPRA would ensure to implement fair regulations that promote sustainable energy solutions in the country.

Sincerely,
Muhammad Munir Tariq
Mobile # 03018542513

Handwritten signature: Registrar

Forwarded please:

<input checked="" type="checkbox"/> For rec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (H.C.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please.

☒ Chairman ☒ M (Tech)
☒ M (Law) ☒ M (Dev)

NEPRA
Consent Document
Copy No. 3-1-26
Date: 2-1-26

1. 1. 26

CHAIRMAN
By No. 7406
Date: 29-12-25

Chairman NEPRA

From: Mike Johnson <mike092019@gmail.com>
Sent: Friday, December 26, 2025 12:52 AM
To: cad@nepra.org.pk
Cc: chairman@nepra.org.pk; registrar@nepra.org.pk
Subject: Do not replace net metering with net billing. Otherwise, will file lawsuit

AoA NEPRA,

I recently came across the following news:

NEPRA Proposes An End To Net Metering For Solar Users

<https://www.brandsynario.com/nepra-end-to-net-metering/>

This news is very disturbing and shocking for many net metering users like me who have invested millions of rs. in setting up solar systems for power generation only to find out that the government is reducing the buyback rate per unit by 50%.

This is extremely unfair and unethical. We have invested millions of rupees in solar systems and it will take at least 10 years to recover our investment.

If NEPRA reduces buyback rate next year, then more than one lac net metering users will file lawsuits against NEPRA.

Hence, please continue net metering till 2030 at least so that we can recover our investment.

Thanks,
Asif Khan
Islamabad

Forwarded please:

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Chairman's Department
Copy No. 51
Date 2-1-26

Registrar

1. 1. 26

CHAIRMAN
By No. 7398
Date: 29-12-25

Chairman NEPRA

From: Mirza Shahrukh Baig <shah54c54c@gmail.com>
Sent: Thursday, December 25, 2025 8:42 PM
To: Chairman@nepra.org.pk
Subject: Net metering

It is a huge injustice to the solar net metering consumers by abolishing green energy policy, on the whims of the IPPs and denying consumers their investments in contributing in green energy at the government of Pakistan promised policy

RECEIVED
12/25/2025
10:00 AM
CHAIRMAN
NEPRA

~~Registrar~~

Forwarded please:

☒ For action ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Legal)

Please provide information, please:

☒ Chairman ☒ Z. M. (Tech.)
☒ M. (Legal) ☒ M. (Dev.)

78
1.1.26

CHAIRMAN
By No. 7387
Date: 29-12-25

Chairman NEPRA

From: Tahir Ashraf Khan <tahirashraf571c@hotmail.com>
Sent: Thursday, December 25, 2025 9:03 PM
To: chairman@nepra.org.pk
Cc: Tahir Ashraf Khan
Subject: NEW NET BILLING POLICY

السلام و علیکم و رحمۃ اللہ و برکاتہ

Mr. Chairman, I would like to say a few words on the subject matter.

In any civilized society or country, no organization can "even think of" turning back on its commitments, made with its clients, what to talk of "practically prepared to do it". Introducing the new "Net Billing Policy" by NEPRA amounts to "stabbing your clients in the back". Through this new policy, you are doing no service to this country or its residents and trying to drive your clients, who are already bearing the brunt of مہنگائی, into a "dead-end street", whereafter, they will be left with no choice, but to either knock on the door of courts or take the matter to streets.

Neither case, you and your organization will not be exonerated from the judgement of that "ultimate court"

جہاں زبانیں گنگ ہوں گی اور باتھ اور پاؤں ہمارے اعمال کی گواہی دیں گے

Please stay mindful of the judgement of that ultimate court.

In every country of the world, governments and related organizations encourage the production of "Green Energy" by giving a great deal of incentives to those who are involved in it. On the contrary, the policy makers in our country, ironically, are trying their best to discourage this activity by bringing in the subject policy.

I have put across a "food for thought" on the subject policy and I sincerely hope that it will not be considered as a "dustbin material".

To sum up, I will only say this that I wish (and I can only wish) NEPRA also comes up with similar policies for the IPPs too, who are sucking the blood of this poor country, like "blood thirsty leeches".

Thanking you in anticipation for going through this email patiently.

Yours Sincerely,

Tahir.

Outlook for Android

Registrar

1.7.26

Forwarded please:

<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (TQM)

Kind information, please.

Chairman Z. M. Tech
Tahir Ashraf Khan

CHAIRMAN
By No. 7396
Date: 29-12-25

Registrar

From: arshad iqbal <arshadiqbal54@yahoo.com>
Sent: Tuesday, December 30, 2025 7:02 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Arshad Iqbal

CNIC 37405-6195983-7

Consumer No. 1141934326

Reference. 09146152685200

House 13, Street 13, Sector C, DHA Phase 2

Islamabad

Cell no 0322-595981

Forwarded please:

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For each recommendation, please use:
1. M (Tech.) 2. M (Fin.)
3. M (Law) 4. M (Misc.)

1.1.26

NEPRA
Licensing Department
Diary No. 54
Date: 2-1-26

Chairman NEPRA

From: Jibran Ijaz <jibranijaz46@gmail.com>
Sent: Thursday, December 25, 2025 11:28 AM
To: Chairman@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

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These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[jibran ijaz]

[BTPL Consumer /
house no 135 phase 1 agrics town raiwind road lahore.

Forwarded please:

<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (CRM)

For kind information, please.

Chairman 2. M (Tech)
M (Law) 4. M (Dev)

By No. 7378
Date: 29-12-25

CHAIRMAN

Registrar

21-01-26

Chairman NEPRA

From: muhammad Ibrahim <muhammadibrahim502@gmail.com>
Sent: Thursday, December 25, 2025 10:42 AM
To: Chairman@nepra.org.pk
Cc: registrar@nepra.org.pk
Subject: Subject. Solar net metering policy.

Respected sir.

There is no announcement by the government of Pakistan as yet, however, social media is full of stories regarding changes in the net metering policy. Please consider the following suggestions:-

1. Net metering for the existing users at least must continue for their seven years contract in line with the provisions of the agreement.
 2. Gross metering or net billing policy being considered for new users should give at least Rs.27/- per export units. However, other limitations like installation of solar system as per the sanctioned load and separate working of import/ export units bill etc may be implemented. The exported units tariff Rs.27/- and imported units as per normal rates of DISCOs during peak and off peak hours.
 3. The sanctioned load @ 1.5% may also continue in selected areas as per feasibility to be determined by the DISCOs. It will be beneficial both for the consumers and the DISCOs.
 4. The existing users must be paid their dues pending since installation of the solar system.
- Submitted for favourable considerations and inclusion in the proposed policy.

Best Regards

Muhammad Ibrahim

Lahore

03078635671

Registrar

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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (EPCOM)

For kind information, please.

☒ Chairman 2. M (Tech)
☒ M (Law) ☒ M (Dev)

NEPRA
Licensing Department
Diary No. 56
Date: 2-1-26

41
1.1.26

CHAIRMAN
DY No. 7377
Date: 29-12-25

Registrar

From: shahid muhammad <shahid_chme@yahoo.com>
Sent: Tuesday, December 30, 2025 8:17 AM
To: Chairman@nepra.org.pk; cad@nepra.org.pk; Registrar@nepra.org.pk
Subject: Reject new net billing policy

Dear Sir/Madam,
I am writing this mail with severe concern that we have spent all of our savings to install solar system at home to cope with the situation of heavy electricity bills. If the govt implements new policy of net billing instead of net metering, all of our spent money will go waste. we reject this proposal and policy. We strongly condemn this policy and recommend to reconsider it otherwise we will protest for our rights.
Regards

Yahoo Mail: Search, organise, conquer

Handwritten notes and signatures at the top of the form, including a large checkmark and a signature.

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (P.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information, please:

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> M (Tech)
<input checked="" type="checkbox"/> M (Law)	<input checked="" type="checkbox"/> M (Dev)

Handwritten date: 1.1.26

Vertical text on the left margin: Licensing Department, Diary No. 58, Date: 2-1-26

Chairman NEPRA

From: Zulfiqar Rana - 3308 <zrana@bankalfalah.com>
Sent: Wednesday, December 24, 2025 2:24 PM
To: cad@nepra.org.pk
Cc: chairman@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTBCM)

For kind information, please:

☒ Chairman ☒ M (Tech) ☒ M (Law) ☒ M (Dev)

The Registrar
NEPRA
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers

Sir,

I submit my formal objections to the Draft NEPRA (Prosumer) Regulations, 2025, published via press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious and immediate financial loss to consumers who installed solar systems under an approved legal regime and with legitimate expectations of affordable electricity and regulatory certainty. Any reduction in the export value of self-generated electricity, adverse changes to settlement mechanisms, or retrospective application of new charges will deprive prosumers of the economic benefits that justified their investment and will defeat the very purpose of net-metering.

Breach of legitimate expectations and regulatory certainty

Many households and businesses invested in rooftop solar based on the existing legal and regulatory framework. Retrospective or punitive changes would amount to a breach of legitimate expectations, undermine the rule of law, and damage investor and consumer confidence in Pakistan's energy policy.

Conflict with national and international sustainability commitments

These proposed changes are inconsistent with Pakistan's stated climate and sustainability commitments, including obligations under the Paris Agreement and the United Nations Sustainable Development Goals, particularly those relating to affordable, reliable, and clean energy and climate action. Discouraging distributed renewable generation at this stage would set back national efforts to reduce emissions, improve energy security, and meet internationally-pledged targets.

Disproportionate burden on prosumers and BTPL consumers

As a consumer of BTPL, I am already adversely affected by:

- Arbitrary deduction/reduction of solar export units;
- Non-transparent charges imposed under the guise of tariff adjustments;
- "Misc. Charges" routinely added to electricity bills that do not appear in other DISCOs' billing.

In this context, the draft regulations would further aggravate the financial exploitation of solar consumers by effectively using prosumers to offset DISCO inefficiencies, losses, theft, and non-recovery for which consumers are not responsible. This approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, consumer protection, and regulatory fairness.

Wider economic and system impacts

CHAIRMAN

By No. 7364

Date: 24-12-25

Discouraging rooftop solar will also harm broader public interests: it will slow job creation in the local solar industry, increase reliance on expensive centralized generation, raise overall system costs for all consumers, and reduce the resilience and flexibility that distributed generation provides to the grid. It will also undermine efforts to diversify Pakistan's energy mix and to lower peak demand pressures on the transmission and distribution network.

Transparency, accountability and procedural fairness

The draft regulations, as currently framed, lack adequate safeguards to prevent misuse of prosumer revenues to cover unrelated DISCO liabilities. There is insufficient transparency around billing adjustments, export accounting, and the methodology for any new charges. There is also no clear, independent mechanism for auditing DISCO practices or for timely redress of consumer grievances.

Relief sought

In light of the foregoing, I respectfully request NEPRA to:

1. Reject any adverse or retrospective changes that would reduce the export value, alter settlement mechanisms, or otherwise penalize existing net-metering consumers who invested under the prior legal regime.
2. Grandfather existing prosumers under the rules and tariffs in place at the time of their interconnection, with any future changes applied only prospectively and after adequate notice and consultation.
3. Ensure prosumers are not used to subsidize DISCO losses, theft, or non-recovery. Any cost-recovery measures must be transparent, justified, and borne in a manner consistent with law and regulatory precedent.
4. Mandate transparent billing and independent audits of export accounting, meter readings, and any "miscellaneous" charges, with clear penalties for unlawful deductions or manipulations.
5. Require a public, evidence-based impact assessment and a meaningful stakeholder consultation process (including consumer groups, prosumer associations, industry representatives, and independent experts) before finalizing any changes.
6. Provide a clear grievance redressal and compensation mechanism for consumers who have suffered arbitrary deductions, illegal charges, or non-transparent billing practices, particularly BTPL consumers.
7. Align the final regulations with Pakistan's climate and energy commitments, ensuring they support, rather than hinder, the national transition to sustainable, distributed generation.

These measures will protect consumers, preserve regulatory credibility, support Pakistan's sustainability goals, and maintain a stable environment for continued private investment in clean energy.

I request that these objections be placed on record and given full and fair consideration before any finalization of the regulations. I am prepared to provide further evidence, billing examples, or testimony to support these objections if required.

Yours sincerely,

Zulfiqar Rana

1142060023

[DHA Phase 2 Islamabad]

"Please do not print this e-mail unless it is absolutely necessary."

This message (including any attachments) is confidential and may be privileged. If you have received it by mistake, please notify the sender by return email and delete this message from your system. Any unauthorized use or dissemination of this message in whole or in part is strictly prohibited. Please note that emails are susceptible to e-crime. Bank Alfalah shall not be liable for the loss, loss or incomplete transmission of the information contained in this communication nor for any delay in its receipt or damage to your system. Bank Alfalah neither guarantees that the content of this communication has been well retained nor that this communication is free of viruses, interceptions or interceptions.

Chairman NEPRA

From: John Shepard <vanguard.shepard@gmail.com>
Sent: Wednesday, December 24, 2025 4:37 PM
To: registrar@nepra.org.pk; chairman@nepra.org.pk; cad@nepra.org.pk
Subject: objections to draft NEPRA(Prosumer)

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA’s website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

“Misc.Charges” routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Rukhsana waqar

[BTPL rukhsana waqar /
[Address / Phase –

Registrar

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CPM)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Dy No. 7367
Date: 24-12-25

Registrar

From: Iftikhar Shah <iftikhar.shah@gmail.com>
Sent: Tuesday, December 30, 2025 8:28 PM
To: Chairman@nepra.org.pk; Registrar@nepra.org.pk; info@nepra.org.pk
Subject: Formal Objections and Comments on Draft NEPRA Prosumer Regulations 2025

To,
The Registrar, National Electric Power Regulatory Authority (NEPRA),
NEPRA Tower, Attaturk Avenue (East),
Sector G-5/1, Islamabad.

Subject: Formal Objections and Comments on the Draft NEPRA (Prosumer) Regulations, 2025

Dear Sir,

I am writing to formally submit my response and strong reservations regarding the proposed NEPRA (Prosumer) Regulations, 2025. While the world is moving toward aggressive solarization to combat climate change and reduce energy costs, the proposed draft appears to penalize citizens who have invested their own capital to support the national grid.

I request the Authority to consider the following points before finalizing these regulations:

1. Retention of Net Metering vs. Shift to Net Billing

The proposal to replace Net Metering with Net Billing (Gross Metering) will effectively kill the incentive for solar adoption in Pakistan. Net metering is not a burden on the national energy system; rather, it provides decentralized generation that reduces the need for expensive fuel imports. The "burden" frequently cited is merely a reduction in the unjustifiable profits of inefficient Independent Power Producers (IPPs). Net metering must continue in its original form to ensure a sustainable energy transition.

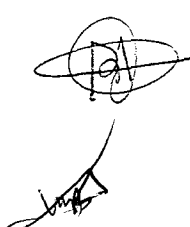
2. Rationalization of the Buy-Back Rate

The proposed buy-back rate based on the National Average Energy Purchase Price (approx. Rs. 11–13) is illogical and discriminatory. This average is artificially lowered by including cheap, legacy Hydropower, which has no technical or economic relevance to the cost of private solar generation.

Demand: The buy-back rate should be pegged to the average unit price paid to IPPs, as solar prosumers are effectively performing the same function as these private generators but without demanding "Capacity Payments."

3. Transparency in Energy Pricing

NEPRA
Planning Department
Date: 21-12-26



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For kind information, please:

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> 2. M (Tech)
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If the government claims the national average cost of energy is only ~Rs. 11 per unit, it is indefensible that consumers are being charged five times that amount. The Authority must explain why billions are being paid to IPPs for electricity that is never produced (Capacity Payments) while taxing prosumers for the electricity they do produce. Consumer tariffs must be rationalized to reflect actual generation costs plus reasonable maintenance and line losses.

4. Solar Capacity vs. Sanctioned Load

The draft's attempt to cap solar capacity strictly at 100% of the sanctioned load is a regressive step. Solar panels operate at varying efficiencies depending on the weather; therefore, the current formula of 1.5 times the sanctioned load must be maintained to allow prosumers to meet their actual energy needs throughout the year.

5. Termination of Inefficient IPP Contracts

National policy should benefit the public, not a handful of influential IPP owners. We have reached a point of "Excess Production Capacity" where the common man is being robbed to pay for idle plants.

NEPRA must stop acting as an advocate for IPPs and instead focus on revising IPP agreements, eliminating the "Capacity Payment" clauses, and immediately terminating contracts with inefficient plants that survive solely on state-mandated "kickbacks."

No new IPP licenses should be sanctioned given the existing surplus.

Public Interest and Moral Responsibility

Solar prosumers should be treated as partners in the "Green Revolution," not as offenders or a "financial burden." The current draft suggests a collusion between the power division bureaucracy and IPP lobbies to protect rent-seeking behavior at the expense of the Pakistani nation.

Conclusion: I urge NEPRA to protect the rights of the 250 million Pakistanis over the interests of a few dozen IPPs. The proposed regulations must be redrafted to favor renewable energy growth and public relief.

Yours sincerely,

Iftikhar Hussain Shah

CNIC: 61101-1971259-9

H. No 30, Street No 19,
Sector B, DHA 2, Islamabad

Date: December 30, 2025

Registrar

From: Humair Saeed <chaudhryumair00@gmail.com>
Sent: Tuesday, December 30, 2025 10:14 PM
To: registrar@nepra.org.pk
Subject: Objections to NEPRA (Prosumer) Regulations, 2025 – Replacement of Net Metering with Net Billing

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Subject: Objections to NEPRA (Prosumer) Regulations, 2025 – Replacement of Net Metering with Net Billing

Dear Sir,

I am writing as a domestic electricity consumer and solar prosumer to formally record my serious concerns and objections regarding the proposed shift from **Net Metering** to **Net Billing** under the NEPRA (Prosumer) Regulations, 2025.

While I fully appreciate NEPRA's responsibility to ensure grid stability and long-term sector sustainability, the replacement of net metering with net billing is, in my view, **economically unjustified, regressive for consumers, and counter-productive to Pakistan's renewable energy objectives.**

1. Severe Erosion of Consumer Economics

Under net billing, exported units are credited at the *National Average Energy Purchase Price*, while imported units are billed at the *full applicable consumer tariff*, inclusive of capacity charges, taxes, and surcharges. This asymmetry fundamentally destroys the financial viability of rooftop solar investments.

Consumers made long-term investment decisions in good faith based on net metering economics, and a sudden policy reversal significantly undermines regulatory credibility.

2. Discouragement of Renewable Energy Adoption

Pakistan faces chronic fuel import dependence, circular debt, and peak-hour shortages. Distributed solar under net metering directly reduces peak demand, transmission losses, and foreign exchange outflows.

Net billing materially lengthens payback periods, discouraging new installations and effectively reversing the momentum achieved over the last decade.

3. Penalizing Self-Consumption Instead of Encouraging It

Net metering rewards efficient self-consumption and grid support. Net billing, on the other hand, penalizes consumers for exporting surplus daytime energy—energy which the grid urgently needs during solar hours—while charging them disproportionately for evening consumption.

4. Inconsistency with Policy Stability and Investor Confidence

Frequent and material changes to settled regulatory frameworks create uncertainty not only for individual consumers but also for installers, financiers, and local manufacturing ecosystems built around rooftop solar. Regulatory stability is essential for long-term planning and capital formation.

5. Alternative Solutions Exist Without Abolishing Net Metering

If NEPRA's concerns relate to grid stress or cross-subsidization, these can be addressed through:

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For kind information, please.

☒ Chairman 2. M (Tech)
☒ M (Law) 4. M (Dev)

NEPRA
Using Department
No. 62
2-1-26
Time-of-Use based net metering adjustments

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1.1.26

- Export caps aligned with sanctioned load
- Gradual grandfathering mechanisms
- Differential treatment for large commercial installations

6. Commercial vs Residential Net Metering

NEPRA must analyse, figure out and evaluate the consumption and impact of commercial and residential net metering separately and devise strategic and policy parameters for both segments separately. Commercial segments financial earning, net metering capacity, annual consumption and huge impact on the National grid would be much higher than the residential segment results. Devise policy without any change to the residential segment to save a common man from any undue and surprising burden which is matchless with the commercial sector.

A complete replacement of net metering with net billing is a blunt instrument that disproportionately harms small and middle-class consumers.

Request

In light of the above, I respectfully request NEPRA to:

- **Retain intact the same net metering framework as the primary framework** for rooftop solar consumers at least for the Residential sector of the country to provide safeguard to a common man and to keep inflation rate low
- Ensure **grandfathering protection** for existing and pipeline installations
- Engage stakeholders to introduce **refined, balanced adjustments** rather than an outright replacement
- Support Solar energy as a long term strategy to say goodbye to the heavy financial burdens of IPPs.

Pakistan urgently needs strategic policies that encourage energy efficiency, self-generation, and reduced grid burden. Net metering has demonstrably contributed to these objectives and should be strengthened—not dismantled.

Thank you for considering this submission.

Yours sincerely,

Name.

Consumer / Prosumer
Pakistan

Registrar

From: Rashid Alvi Alvi <alvi.168@gmail.com>
Sent: Tuesday, December 30, 2025 10:19 PM
To: registrar@nepra.org.pk
Subject: Draft NEPA (Prosumer) REGULATIONS 2025 & ADVERSE IMPACT ON BTPL NET-METERING CONSUMERS

The Registrar NEPA
NEPA Headquarters Islamabad.

Dear sir,

I hereby submit my observations/ objections to the Draft NEPA (Prosumer) Regulations 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPA's website.

The proposed changes to the net-metering/ prosumer framework will cause great financial loss to solar consumers who installed solar systems under an approved legal framework with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive the consumers from major benefits of their self-generated, relatively cheaper electricity and will badly affect the real goal/ purpose of alternative energy program and net-metering initiatives.

Moreover, as a [BTPL] electricity consumer, I am, along with other net-metering consumers of the BTPL already being adversely affected by the following's unjust actions/ decisions of the Management.

- a- An arbitrary ~30% deduction from total monthly exported units from BTPL solar consumers, saying those units were consumed by the IESCO distribution system and the IESCO Management doesn't pay the price of these exported units to BTPL Management.
- b- Illegal charges imposed under the guise of tariff adjustment and other similar heads.
- c- Misc. Charges are routinely added to monthly electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers; effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible. Such an approach is unjust and contrary to the objectives of Renewable Energy Promotion, Regulatory Certainty and Consumer Protection.

It is respectfully requested to NEPA that;

- Protecting the net-metering Consumers from substantial financial loss, the authority should reject any adverse or retrospective changes affecting existing net-metering consumers.
- Ensure that prosumers are not penalized to cover DISCOs/ utility losses and theft of electricity and
- Protect net-metering consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.
- The Electricity Billing system of BTPL should be handed over to IESCO/ LESCO etc as SNGPL in BTPL is managing all gas related matters by itself.

NEPA
Licensing Department
Dy. No. 63
Date: 2-1-26

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTRCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

These observations/ objections may please be placed on record and duly considered before finalization the NEPRA (Prosumer) Regulations 2025. Thanks.

Yours sincerely,

Rashid Ahmed Alvi
BTPL Consumer; Generation Licence No.DGL/6616/2020
Bahria Town Phase-4, Islamabad.

Registrar

From: Arshed Ahmed Butt <arshedbutt50@yahoo.com>
Sent: Wednesday, December 31, 2025 12:35 AM
To: Registrar@nepra.org.pk
Subject: Protest on net billing by a senior citizen

Yahoo Mail:
To,

Forwarded please:

<input checked="" type="checkbox"/> For my action	<input type="checkbox"/> For information
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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (ECON)

For kind information, please:

<input checked="" type="checkbox"/> Chairman	<input type="checkbox"/> 2. M (Tech)
<input checked="" type="checkbox"/> 3. M (Law)	<input checked="" type="checkbox"/> 4. M (Dev)

The Registrar, National Electric Power Regulatory Authority (NEPRA),

NEPRA Tower, Attaturk Avenue (East),

Sector G-5/1, Islamabad.

Subject: Formal Objections and Comments on the Draft NEPRA (Prosumer) Regulations, 2025

Dear Sir,

I am writing to formally submit my response and strong reservations regarding the proposed NEPRA (Prosumer) Regulations, 2025. While the world is moving toward aggressive solarization to combat climate change and reduce energy costs, the proposed draft appears to penalize citizens who have invested their own capital to support the national grid.

I request the Authority to consider the following points before finalizing these regulations:

1. Retention of Net Metering vs. Shift to Net Billing

The proposal to replace Net Metering with Net Billing (Gross Metering) will effectively kill the incentive for solar adoption in Pakistan. Net metering is not a burden on the national energy system; rather, it provides decentralized generation that reduces the need for expensive fuel imports. The "burden" frequently cited is merely a reduction in the unjustifiable profits of inefficient Independent Power Producers (IPPs). Net metering must continue in its original form to ensure a sustainable energy transition.

NEPRA
Licensing Department
Copy No. 64
Date: 2-1-26

2. Rationalization of the Buy-Back Rate

The proposed buy-back rate based on the National Average Energy Purchase Price (approx. Rs. 11-13) is illogical and discriminatory. This average is artificially lowered by including cheap, legacy Hydropower, which has no technical or economic relevance to the cost of private solar generation.

Demand: The buy-back rate should be pegged to the average unit price paid to IPPs, as solar prosumers are effectively performing the same function as these private generators but without demanding "Capacity Payments."

3. Transparency in Energy Pricing

If the government claims the national average cost of energy is only ~Rs. 11 per unit, it is indefensible that consumers are being charged five times that amount. The Authority must explain why billions are being paid to IPPs for electricity that is never produced (Capacity Payments) while taxing prosumers for the electricity they do produce. Consumer tariffs must be rationalized to reflect actual generation costs plus reasonable maintenance and line losses.

4. Solar Capacity vs. Sanctioned Load

The draft's attempt to cap solar capacity strictly at 100% of the sanctioned load is a regressive step. Solar panels operate at varying efficiencies depending on the weather; therefore, the current formula of 1.5 times the sanctioned load must be maintained to allow prosumers to meet their actual energy needs throughout the year.

5. Termination of Inefficient IPP Contracts

National policy should benefit the public, not a handful of influential IPP owners. We have reached a point of "Excess Production Capacity" where the common man is being robbed to pay for idle plants.

NEPRA must stop acting as an advocate for IPPs and instead focus on revising IPP agreements, eliminating the "Capacity Payment" clauses, and immediately terminating contracts with inefficient plants that survive solely on state-mandated "kickbacks."

No new IPP licenses should be sanctioned given the existing surplus.

Public Interest and Moral Responsibility

Solar prosumers should be treated as partners in the "Green Revolution," not as offenders or a "financial burden." The current draft suggests a collusion between the power division bureaucracy and IPP lobbies to protect rent-seeking behavior at the expense of the Pakistani nation.

Conclusion: I urge NEPRA to protect the rights of the 250 million Pakistanis over the interests of a few dozen IPPs. The proposed regulations must be redrafted to favor renewable energy growth and public relief.

Yours sincerely,

[Arshed Butt, Senior Citizen]

Islamabad
31 Dec 25

Chairman NEPRA

From: Zia Kazmi <captkazmi1@yahoo.com>
Sent: Friday, December 26, 2025 6:20 PM
To: Chairman@nepra.org.pk
Subject: Solar billing

New policy against the people of Pakistan is not exceptable. Pl leave us alone. You have nothing to do our solar system...
Yahoo Mail: Search, Organize, Conquer

Forwarded please:

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For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> M (Tech)
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~~Registrar~~

NEPRA
Licensing Department
Dist. No. 65
Date 2-1-26

106
1.1.26

CHAIRMAN
By No. 71107
Date: 29-12-25

Chairman NEPRA

From: Chaudhry Shahid Nazir <colshahid@icloud.com>
Sent: Thursday, December 25, 2025 1:45 PM
To: Chairman@nepra.org.pk
Subject: Net Metering

Dear Sir ! This issue can only be solved by equating net metering rates with that of IPP rates.
Even installed capacity payment should be given to net mattering users too.
This will give nation wide universal data. The govt then should call a unilateral rate for IPPs and net metering users.
Capacity payment if not given to net metering users should not be given to IPPs.
Rates given to net metering users should be given to IPPs and whole country's capacity payment, circular debt and power rates will be come affordable.
Differentiating IPPs and Net-metering is the causing the two slabs.
It's just that net metering is a mini IPP and a balanced , uniform rate approach for IPPs, net metering, capacity chargers, circular debt the whole country is rescued.

Sent from my iPhone

Registrar

Forwarded please:

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input checked="" type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECM)

For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> 2. M (Tech)
<input checked="" type="checkbox"/> S. M (Law)	<input checked="" type="checkbox"/> M (Dev)

NEPRA
Licensing Department
Copy No. 66
Date: 2-1-26

CHAIRMAN
Dy No. 7381
Date: 29-12-25

Chairman NEPRA

From: Brig zareen <brigzareen74@gmail.com>
Sent: Wednesday, December 24, 2025 2:42 PM
To: Chairman@nepra.org.pk

Assalamalaikum. Net Metering. Either old system to continue or existing customers may be exempted from new policy. We have invested a huge amount which is not reversable now therefore we should be compensated accordingly...

Brig Sardar Muhanmad Zareen Khan House 191 St 4 near Qasim Market Rawalpindi. Contact:
03345111748
24 December 2025

For / To
By / To
Date / To

Handwritten signature

Handwritten signature

Forwarded please:

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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (CIBCM)

For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> 2. M (Tech)
<input checked="" type="checkbox"/> C. M (Law)	<input checked="" type="checkbox"/> M. M (Dev)

NEPRA
Licensing Department
Entry No. 67
Date 2-1-26

86
1-1-26

CHAIRMAN
Dy No. 7365
Date: 24-12-25

Chairman NEPRA

From: Saima Asad <saimasad135@gmail.com>
Sent: Thursday, December 25, 2025 5:37 PM
To: Chairman@nepra.org.pk
Subject: Net metering

Plzzzz don't ruin All the chances of citizens hopes for a better future in this country ruled unlawfully... act your part by not implementing these obnoxious proposed policies... hope your conscious will prevail you to act truthfully and not falling into trap of pleasing the upper elite Sent from my iPhone

Forwarded please:

☒ For discussion

☐ For information

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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (HQA)

For kind information, please,

☒ Chairman ☒ 2. M (Tech)
☒ 3. M (Law) ☒ 4. M (Dev)

Registrar

NEPRA
Licensing Department
Diary No. 68
2-1-26

83
1.1.26

CHAIRMAN
Dy No. 7382
Date: 29-12-25

Chairman NEPRA

From: Zafar Zaidi <zafarzaidiummat@gmail.com>
Sent: Thursday, December 25, 2025 6:22 PM
To: Chairman@nepra.org.pk
Subject: نیٹ میٹنگ پالیسی تبدیل نہ کریں

پرانے صارفین کی نیٹ میٹنگ پالیسی تبدیل نہ کریں شکریہ

Forwarded please:

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☐ For information

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<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (PH)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EUCM)

For kind information, please.

☒ Chairman ☐ 2. M (Tech)
☐ 3. M (Law) ☐ 4. M (Dev)

Registrar

NEPRA
Licensing Department
Diary No. 69
Date: 2-1-26

82
1.1.26

CHAIRMAN
Dy No. 7383
Date: 29-12-25

Chairman NEPRA

From: J Aziz <azizjavedd@gmail.com>
Sent: Thursday, December 25, 2025 6:50 PM
To: Chairman@nepra.org.pk
Cc: registrar@nepra.org.pk; cad@nepra.org.pk
Subject: Solar users

Dear Sir,

Assalamu alaikum,

I am writing to respectfully request that you consider grandfathering the old rates for existing users who invested in solar setups during the previous tariff structure.

Many of us made significant investments based on the rates prevalent at the time, and a change in rates would cause financial hardship.

I would be grateful if you could exempt old users from the new rates and allow them to continue under the old tariff.

Thank you for your understanding and support.

Best regards,
Javed Aziz

Address: 84-B, Khyaban Muslim ,Phase G,DHA, Karachi

Sent from my iPhone

Registrar

Forwarded please:

☒ For n.e. action ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2-1-26
Date: 29-12-25

CHAIRMAN
Dy No. 7384
Date: 29-12-25

Chairman NEPRA

From: Abdul Ahad <aakhan314@gmail.com>
Sent: Thursday, December 25, 2025 7:53 PM
To: Chairman@nepra.org.pk
Subject: Net Metering

Dear Sir,
AsSalaam O Aleykum

I went thru the proposed net metering policy and it is preposterous. This is highway robbery. How can you go back on your contract and rob us by first luting us into this scheme and then going back on your word.
We will have to take up this case in the supreme court.
Please reconsider your decision and work for the benefit of the consumer, not the providers who are robbing the poor public with both hands.

Best Regards
Abdul Ahad Khan
Cell: +92 321 947-6833

Registrar

Forwarded please:

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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (NEM)

For kind information, please.

<input checked="" type="checkbox"/> Chairman	<input checked="" type="checkbox"/> M (Tech)
<input checked="" type="checkbox"/> M (Law)	<input checked="" type="checkbox"/> M (Dev)

1.1.26
79

CHAIRMAN
By No. 7386
Date: 29-12-25

Chairman NEPRA

From: omar hayat <omarhay1@hotmail.com>
Sent: Thursday, December 25, 2025 8:45 PM
To: Chairman@nepra.org.pk
Subject: Fw: Net Metering Policy

Get Outlook for iOS

From: omar hayat <omarhay1@hotmail.com>
Sent: Thursday, December 25, 2025 8:29 PM
To: cad@nepra.org.pk <cad@nepra.org.pk>
Subject: Net Metering Policy

As a consumer, I disagree with NEPRA's new solar policy because it drastically reduces the financial benefits of rooftop solar, undermines incentives for clean energy adoption, and adds unnecessary regulatory hurdles.

Key Points of Disagreement

- Sharp reduction in buyback rate: The new net billing framework cuts compensation for surplus electricity from Rs25.98 per unit to Rs11 per unit, slashing consumer returns by more than half The Nation +2.
- Shorter contract duration: Agreements have been reduced from seven years to five years, creating uncertainty and discouraging long-term investment.
- Licensing burden: Even small-scale solar systems (below 25 kW) now require a NEPRA licence, adding bureaucracy and cost for ordinary households.
- Loss of consumer empowerment: Under net metering, consumers could offset their bills directly. Net billing forces them to sell at a low fixed rate while buying electricity at much higher tariffs.
- Risk to renewable adoption: By weakening incentives, the policy could slow Pakistan's transition to clean energy at a time when climate vulnerability and rising fuel imports demand stronger support for renewables.

Regards

Omar

A Concerned Consumer

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NEPRA
Licensing Department
72
72
2-1-26

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☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECON)

For information, please.

☒ Chairman 2. M (Tech)

☒ M (Law) ☒ M (Dev)

CHAIRMAN
Dy No. 7388
Date: 29-12-25
1-1-26

Chairman NEPRA

From: Lt. Gen (R) Naeem Khalid Lodhi <naeem_lodhi@me.com>
Sent: Friday, December 26, 2025 7:26 PM
To: Chairman@nepra.org.pk
Subject: Net Metering / Net Billing

Dear Sir, AA

Before taking such an important anti public and pro Energy Producers decision, kindly keep in mind that:- The decision makers earlier also could not fully fathom the impact of Net Metering on IPPs , DISCOs etc. Be ready for another shock that the public reaction (technical adjustments) will deliver to the intent of this new decision. In my assessment (being an engineer myself) within a year IPPs and DISCOs will face further problems and losses.

Sirs, think before you leap.

Reducing electricity prices and encouraging higher consumers with lower tariffs is the actual permanent remedy . That will hit solar financial feasibility and will consume more from electricity producers.

Sincerely Yours

Lt Gen Naeem Lodhi retired

Sent from my iPhone

NEPRA
Licensing Department
Dlary No. 73
Date: 21-26

Registrar

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For kind information, please.
Chairman Z. M (Tech)
Z. M (Law) L. M (Dev)

1-1-26
104

CHAIRMAN
Dy No. 7409
Date: 29-12-25

Chairman NEPRA

From: Con Temporary <contemporary@gmail.com>
Sent: Wednesday, December 24, 2025 7:31 PM
To: cad@nepra.org.pk; chairman@nepra.org.pk
Subject: Objections over Draft NEPRA regulations 2025

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Dear Chairman,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
MUHAMMAD SHAFI

[BTPL Consumer /
HOUSE 339
STREET 17
B 17

Forwarded please:

<input checked="" type="checkbox"/> For decision action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Elec.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADP (P&T)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/RCM)

For kind information, please.

☒ Chairman ☒ 2. M (Tech)
☒ M (Law) ☒ M (Dev)

Chairman NEPRA

From: Khalid Mahmood <khalidmssdl@gmail.com>
Sent: Sunday, December 28, 2025 6:45 PM
To: Chairman@nepra.org.pk
Subject: NEPRA worst action against innocent masses and protection gaint mafia

Dear sir

It is barbaric action against masses to finishing net metering and applying net billing system. Net metering system applied by the government may please be continued for the new and old user and get blessing of the people.

Otherwise it will be just an action to protect IPPs, feudal lords and other similar classes and crushing n disappointing people of Pakistan.

Thanks for considering.

KHALID Mahmood

Addl. DG	Dir	Addl. Dir	DD-I
AD-I	AD-II	AD-III	AD-IV
TA	OA-I	OA-II	OA-III

Registered

[Signature]

[Signature]
31.12.25

Forwarded please:

☒ For nec. action ☐ For information

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUCM)

For kind information, please.

1. Chairman 2. M (Tech)

3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Copy No. 24
Date: 01-01-26

15177
31.12.25

CHAIRMAN
By No. 7927
Date: 29-12-25

Chairman NEPRA

From: Hanif Adil <hanif.adil112@gmail.com>
Sent: Sunday, December 28, 2025 3:52 PM
To: cad@nepra.org.pk
Cc: Chairman@nepra.org.pk
Subject: Net metering conversation into net billing.

We have gone through your website proposing some changes in net metering policy.

Please clarify that only tariff has been reduced from 27 to 22 and remaining policy for offsetting the unit will remain unchanged.

It is unfair to reduce the tariff for export units from Rs.27 to 22.

If policy for offsetting the units is also being changed it will be again unjustified and against the public interest.

It will be heading shake of the confidence over govt.

Please clarify the position.

M.hanif Adil
03078799511

Adl. DG	Adl. Dir	DD
AD-I	RO	PS
TA	CA-I	CA-II

Registrar

OK

31.12.25

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For kind information, please,
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

15178
31.12.25

CHAIRMAN
By No. 7425
Date: 29-12-25

Chairman NEPRA

From: Dr. Junaid Habib Khan <drjunikh@gmail.com>
Sent: Sunday, December 28, 2025 12:34 PM
To: Chairman@nepra.org.pk
Cc: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Addl. DG	AD-I	AD-II	AD-III
TA	OA-I	OA-II	OA-III

Registrar

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Junaid Habib Khan

Forwarded please:

☒ For rec. action ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN

Dy No. 7424

Date: 29-12-25

Chairman NEPRA

From: Sh Jj <shjj2948@gmail.com>
Sent: Sunday, December 28, 2025 9:46 AM
To: Chairman@nepra.org.pk
Subject: Net Metering

Dear Chairman,

Why are you hell bent upon to undo net metering billing methodology. People have paid from their own savings and installed solar panels. Govt world over are encouraging alternate energy resources and here in Pakistan you are making people pay for decisions made by your incompetent teams. Atleast exempt the old users from subject revision and let people live.

Thanks

Addl. DG	<input checked="" type="checkbox"/>	Addl. Dir	-DD-I
AD-I	NO	PS	ES
TA	CA-I	CA-II	CA-III

Registrar

OK

31/12/25

Forwarded please:

☒ For rec. action ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EUCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Copy 27
Date: 01-01-26

15/81
31.12.25

CHAIRMAN
By No. 71123
Date: 29-12-25

Chairman NEPRA

From: Top Gun <fayyazshaz@gmail.com>
Sent: Sunday, December 28, 2025 9:55 AM
To: Chairman@nepra.org.pk
Subject: Policy dacoity

The new proposed policy is a dacoity on the users end

Addl. DG	✓	Addl. Dir.	ADD-I
AD-I	✓	PS-I	PS
TA	✓	OA-II	OA-III

Registrar

2

31.12.25

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For kind information, please.

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

15182
31.12.25

CHAIRMAN
Dy No. 1422
Date: 29-12-25

NEPRA
Licensing Department
Dy No. 28
Date: 01-01-26

Chairman NEPRA

From: Irum Tanzeel <irumtanzeel@gmail.com>
Sent: Saturday, December 27, 2025 12:07 PM
To: Chairman@nepra.org.pk; cad@nepra.org.pk; Registrar@nepra.org.pk
Subject: Request for Not implementing New Net Billing Policy

Dear Chairman NEPRA,

I'm writing to express concern about the new Net Billing Policy launching on Jan 14, 2026. The policy affects existing net metering users significantly. I request exemption for old users or reconsideration of purchase rates (Rs. 27 for old vs Rs. 11.5 for new users).

This change impacts fairness and solar investment viability. I urge NEPRA to reconsider and involve broader stakeholder participation.

Sincerely,

Irum Tanzeel.

Adtl. DG	<input checked="" type="checkbox"/>	Adtl. Dir.	DD-I
AD-I	<input type="checkbox"/>	PS	EIS
TA	<input type="checkbox"/>	OA-II	OA-III

Registrar

NEPRA
Licensing Department
Query No. 23
Date: 01-01-26

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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUCM)

For kind information, please,
✓ Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

31.12.25

CHAIRMAN
Dy No. 7417
Date: 29-12-25

Chairman NEPRA

From: Dushka <dushka50@yahoo.com>
Sent: Saturday, December 27, 2025 9:24 AM
To: Chairman@nepra.org.pk
Subject: Billing!

My complaint is that at the new rate the billing will be too high!

Rgards,

Dr Dushka Hyder Saiyid (w/o) Senator Mushahid Hussain Sayed Sent from my iPhone

Addl. DG	AD-I	RO	PS	E/S
TA	OA-I	OA-II	OA-III	

Registrar

Forwarded please:

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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CI/CM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

15189
31-12-25

CHAIRMAN
Dy No. 74/15
Date: 29-12-25

Chairman NEPRA

From: Dushka <dushka50@yahoo.com>
Sent: Saturday, December 27, 2025 10:42 AM
To: Chairman@nepra.org.pk
Subject: Billing issue!

My complaint is that with the new rates, no one will be able to afford the new bills!

Dr Dushka Hyder Saiyid (w/o) Senator Mushahid Hussain Sayed!
Sent from my iPhone

27

Addl. DG:	✓	Addl. Dir.	-DD-I
AD-I	✓	PS	ES
TA	OA-I	OA-II	OA-III

~~Registrar~~

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

31-12-25

15188
31.12.25

CHAIRMAN
Dy No. 7416
Date: 29-12-25

Chairman NEPRA

From: Yasmeen Raees <yasraees21@gmail.com>
Sent: Saturday, December 27, 2025 9:11 PM
To: cad@nepra.org.pk; registrar@nepra.org.pk; chairman@nepra.org.pk
Subject: Net billing not accepted.

It is requested kindly not to apply net billing mechanism it is completely unjustifiable.

Addl. DG	DD-I	Addl. Dir	DD-I
AD-I	RD	PS	L/S
TA	OA-I	OA-II	OA-III

Registrar

31.12.25

Forwarded please:

☒ For neg. action ☐ For information

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/RCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

15184
31.12.25

CHAIRMAN
Dy No. 7420
Date: 29-12-25

Chairman NEPRA

Addl. DG	Dir	Addl. Dir	DD-1
AD-I	DO	PS	E/S
TA	OA-I	OA-II	OA-III

From: Umoori <umartariq38@gmail.com>
Sent: Friday, December 26, 2025 11:48 PM
To: Chairman@nepra.org.pk; cad@nepra.org.pk; Registrar@nepra.org.pk
Subject: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy

I am a registered Solar Net Metering consumer operating under a valid approval / license issued pursuant to the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. My particulars are provided below for official record:

Consumer Information:

Name: Tariq Mehmood Raja
Postal Address: House KK54, Sher Ahmed Road, Khanna Kok, Rawalpindi
Distribution Company (DISCO): IESCO
Net Metering License No./ Reference No.: 14316101204

Through this submission, I hereby lodge a formal complaint under NEPRA's Consumer Affairs framework against the recently notified Solar Net Metering / Net Billing Policy, on the following legal and regulatory grounds:

1. The new policy adversely affects existing net metering consumers who made capital investments based on the earlier notified regulations, approved tariffs, and legally executed agreements.
 2. The retrospective or altered application of revised billing mechanisms undermines the principle of regulatory certainty and legitimate consumer expectation.
 3. The policy materially changes the financial and commercial terms under which net metering licenses were granted, without adequate consumer consultation or transitional protection.
 4. The revised framework discourages distributed generation and contradicts the objectives of renewable energy promotion, consumer protection, and sustainable power sector development.
- It is respectfully submitted that all existing net metering consumers entered into binding agreements in good faith, relying on the continuity and stability of NEPRA's approved regulatory regime. Any unilateral modification impacting existing license holders raises serious consumer protection and regulatory compliance concerns.

Relief Sought:

In view of the above, I respectfully request NEPRA to:

- a) Safeguard the rights of existing net metering consumers by exempting them from the application of the new policy;
- b) Review the notified policy through due stakeholder consultation in accordance with best regulatory practices; and
- c) Ensure that any future regulatory changes are prospective in nature and compliant with consumer protection principles.

I request that this complaint be registered, acknowledged, and processed under NEPRA Consumer Affairs procedures, and I may be informed of the outcome accordingly.

Yours sincerely,
Tariq Mehmood Raja
26 December 2025

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTECM)

For kind information, please.

1. Chairman
2. M (Tech)
3. M (Law)
4. M (Dev)

Chairman NEPRA

From: hassan iftikhar <yahyahassan5032@gmail.com>
Sent: Sunday, December 28, 2025 12:32 AM
To: Chairman@nepra.org.pk

Please restore old net metering

Register my

Addl. DG	✓ Dir	Addl. Dir	DD-I
AD-I	RO	PS	E.S
TA	OA-I	OA-II	OA-III

31.12.25

Forwarded please:

☒ For action ☐ For information

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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (L.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ICBOM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

15183
28.12.25

CHAIRMAN
Dy No *7421*
Date *29-12-25*

NEPRA
Licensing Department
Copy No. *18*
Date *01-01-26*

Chairman NEPRA

From: fauzia qureshi <fauziahqureshi@gmail.com>
Sent: Friday, December 26, 2025 8:36 PM
To: Chairman@nepra.org.pk
Subject: Net metering policy

Sir
Have learnt that the net metering rates are under revision with effect from 14 Jan 26. New policy will be applicable to both new and old licensees, except the purchase rate which will be Rs. 27 for old users and Rs. 11.5 for new users. This is a request to kindly reconsider this as people have invested in putting up solar systems and clean energy systems and should be rewarded instead of penalised with no returns on their investment We look forward to a positive response FAUZIA QURESHI Sent from my iPhone

92

Addl. DG	RO	Addl. Dir.	DD-I
AD-I	PS	E/S	
TA	OA-I	OA-II	OA-III

Registrar

31-12-25

Forwarded please:

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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

15193
31.12.25

CHAIRMAN
By No. 7411
Date: 29-12-25

Chairman NEPRA

From:
Sent:
Cc:
Subject:

Tariq Mahmud <tm_1954@yahoo.com>
Friday, December 26, 2025 8:27 PM
chairman@nepra.org.pk
Net Metering Policy Change

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trd.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIBCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[Tariq Mahmud]

[BTPL Consumer /
H/12, St 15, Sector C, DHAI-2, Islamabad]

Yahoo Mail: Search, organise, conquer

15194
31.12.25
CHAIRMAN
DY No. 7410
Date: 29-12-25

Chairman NEPRA

From:
Sent:
To:
Cc:
Subject:

NEPRA
Licensing Department
Diary No. 15
Date: 01-01-26

ceo@ages.pk
Friday, December 26, 2025 9:28 PM
Chairman@nepra.org.pk
Registrar@nepra.org.pk; cad@nepra.org.pk
Feedback- Nepra Prosumer Regulations2025

Forwarded please:

<input checked="" type="checkbox"/> For recd-action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (I/c.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> ADG (Tnt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRBCM)

For kind information, please.

Chairman 2. M (Tech)
1. M (Law) 4. M (Dev)

Dear Sir,

Addl. DG	Dir	Addl. Dir	DD-I
*AD-I	RO	PS	E/S
TA	OA-I	OA-II	OA-III

We do understand that in the last couple of years, production and revenue from energy supply have dynamically changed, and we are also aware of the new policy which will help DISCOs to generate more direct revenue.

The new policy has two impacts on solar users and the Government :

1. Financial
2. Environmental

Several users have already raised their proper and genuine concerns regarding financial impact. Our few cents on **Environmental Impact** are below:

1. As per the new policy, the **on-Grid** solar system is limited to a sanctioned load based on the transformer rating of the area and user population, but legally users can have any solar capacity as an **off-grid (Hybrid)** system.
2. By limiting the on-grid capacity to the sanctioned load, the only option left is for the users to install the hybrid system to cover their needs from battery backup when direct solar energy is not available. This will trigger a boom in the lithium battery imports in the country.

3. Lithium is categorized as a Hazardous Material:

Environmental Hazards: Improper disposal releases toxic chemicals (cobalt, nickel, lithium) that contaminate soil, water, and harm ecosystems.

Fire Risk: Lithium batteries can ignite or explode in garbage trucks or incinerators if mixed with flammable waste.

So, the new Policy will generate some revenue for DISCO's at the cost of putting all solar users at Fire & Environment risk.

4. As per international regulations, after EOL (End of Life), lithium batteries have to be disposed of according to the strict environmental procedure by a **certified recycler**, which at the moment is not available in the country.

5. In our country, most of the taxes are indirect taxes. Why don't increase indirect revenue by selling green solar energy to the dying industry at cheaper rates? Which will help to increase the exports in the country to have a more stable economy, rather than supporting only DISCOs?

My team is more than happy to provide further details on this if required.

Mustaghees Ahmad
03119805112

CHAIRMAN

Dy No. 7412
Date: 29-12-25

Chairman NEPRA

From:
Sent:
To:
Subject:

NEPRA
Licensing Department
Diary No. 09
Date: 01-01-26

Iftikhar ul-haq <iftikharchemist@gmail.com>

Friday, December 26, 2025 10:50 PM

registrar@nepra.org.pk; chairman@nepra.org.pk

Objection to NEPRA Regulations 2025 for the replacement of Net Metering with Net Billings

Forwarded please:	
<input checked="" type="checkbox"/> For action	<input type="checkbox"/> For information
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<input type="checkbox"/> AGC (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTCM)

For kind information, please.

Chairman 2. M (Tech)
M (Law) 4 M (Dev)

To
The Registrar
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Subject: Objections to NEPRA (Prosumer) Regulations, 2025 – Replacement of Net Metering with Net Billing

Respected Sir,

I am writing as a domestic electricity consumer and solar prosumer to formally record my serious concerns and objections regarding the proposed shift from Net Metering to Net Billing under the NEPRA (Prosumer) Regulations, 2025.

While I fully appreciate NEPRA's responsibility to ensure grid stability and long-term sector sustainability, the replacement of net metering with net billing is, in my view, economically unjustified, regressive for consumers, and counter-productive to Pakistan's renewable energy objectives.

1. Severe Erosion of Consumer Economics

Under net billing, exported units are credited at the National Average Energy Purchase Price, while imported units are billed at the full applicable consumer tariff, inclusive of capacity charges, taxes, and surcharges. This asymmetry fundamentally destroys the financial viability of rooftop solar investments.

Consumers made long-term investment decisions in good faith based on net metering economics, and a sudden policy reversal significantly undermines regulatory credibility.

2. Discouragement of Renewable Energy Adoption

Pakistan faces chronic fuel import dependence, circular debt, and peak-hour shortages. Distributed solar under net metering directly reduces peak demand, transmission losses, and foreign exchange outflows.

Net billing materially lengthens payback periods, discouraging new installations and effectively reversing the momentum achieved over the last decade.

3. Penalizing Self-Consumption Instead of Encouraging It

Net metering rewards efficient self-consumption and grid support. Net billing, on the other hand, penalizes consumers for exporting surplus daytime energy—energy which the grid urgently needs during solar hours—while charging them disproportionately for evening consumption.

4. Inconsistency with Policy Stability and Investor Confidence

Frequent and material changes to settled regulatory frameworks create uncertainty not only for individual consumers but also for installers, financiers, and local manufacturing ecosystems built around rooftop solar. Regulatory stability is essential for long-term planning and capital formation.

5. Alternative Solutions Exist Without Abolishing Net Metering

If NEPRA's concerns relate to grid stress or cross-subsidization, these can be addressed through:

- Time-of-Use based net metering adjustments
- Export caps aligned with sanctioned load
- Gradual grandfathering mechanisms
- Differential treatment for large commercial installations

6. Commercial vs Residential Net Metering

Addl. DG	Addl. Dir.	DD-1
AD-I	RO	PS
TA	OA-I	OA-II
		OA-III

Registrar

15/12/25
31.12.25

CHAIRMAN

Dy No. 7413

Date: 29-12-25

NEPRA must analyse, figure out and evaluate the consumption and impact of commercial and residential net metering separately and devise strategic and policy parameters for both segments separately. Commercial segments financial earning, net metering capacity, annual consumption and huge impact on the National grid would be much higher than the residential segment results. Devise policy without any change to the residential segment to save a common man from any undue and surprising burden which is matchless with the commercial sector.

A complete replacement of net metering with net billing is a blunt instrument that disproportionately harms small and middle-class consumers.

Request

In light of the above, I respectfully request NEPRA to:

- Retain intact the same net metering framework as the primary framework for rooftop solar consumers at least for the Residential sector of the country to provide safeguard to a common man and to keep inflation rate low
- Ensure grandfathering protection for existing and pipeline installations
- Engage stakeholders to introduce refined, balanced adjustments rather than an outright replacement
- Support Solar energy as a long term strategy to say goodbye to the heavy financial burdens of IPPs.

Pakistan urgently needs strategic policies that encourage energy efficiency, self-generation, and reduced grid burden. Net metering has demonstrably contributed to these objectives and should be strengthened—not dismantled.

Thank you for considering this submission.

Yours sincerely,

Dr. Iftikhar Ul haq

Associate professor of chemistry

Govt Graduate college model town Lahore

House # 352 Ali block Bahria town Lahore

Consumer / Prosumer BTL-10752

Pakistan

IFTIKHAR -UL - HAQ

Chairman NEPRA

From: Wajahat Rizvi <23whr53@gmail.com>
Sent: Saturday, December 27, 2025 9:01 PM
To: Chairman@nepra.org.pk
Subject: Complaint under NEPRA Consumer Affairs Regulations Regarding Implementation of New Solar Net Metering / Net Billing Policy
Attachments: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering Net Billing Policy_27Dec25.docx; Untitled attachment 00041.txt

Sent

Addl. DG	Mr.	Addl. Dir	DD-I
AD-I	RO	PS	E/S
TA	OA-I	OA-II	OA-III

Register

31.12.25

[Signature]

Forwarded please:

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<input type="checkbox"/> ADG (Int.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CHCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

15185
31.12.25

CHAIRMAN
Dy No. 7499
Date: 29-12-25

NEPRA
Licensing Department
Entry No. 08
Date: 01-01-26

The Consumer Affairs Division
National Electric Power Regulatory Authority (NEPRA)
Islamabad

Subject: Complaint under NEPRA Consumer Affairs Regulations regarding implementation of New Solar Net Metering / Net Billing Policy

I am a registered Solar Net Metering consumer operating under a valid approval / license issued pursuant to the NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. My particulars are provided below for official record:

Consumer Information:

Name: Syed Wajahat Hussain Rizwi
Postal Address: House 163, Street 5, F11/1 Islamabad
Distribution Company (DISCO): IESCO
Net Metering License No./ Reference No.: 04141270753700

Through this submission, I hereby lodge a **formal complaint** under NEPRA's Consumer Affairs framework against the recently notified **Solar Net Metering / Net Billing Policy**, on the following legal and regulatory grounds:

1. The new policy adversely affects existing net metering consumers who made capital investments based on the earlier notified regulations, approved tariffs, and legally executed agreements.
2. The retrospective or altered application of revised billing mechanisms undermines the principle of regulatory certainty and legitimate consumer expectation.
3. The policy materially changes the financial and commercial terms under which net metering licenses were granted, without adequate consumer consultation or transitional protection.
4. The revised framework discourages distributed generation and contradicts the objectives of renewable energy promotion, consumer protection, and sustainable power sector development.

It is respectfully submitted that all existing net metering consumers entered into binding agreements in good faith, relying on the continuity and stability of NEPRA's approved regulatory regime. Any unilateral modification impacting existing license holders raises serious consumer protection and regulatory compliance concerns.

Relief Sought:

In view of the above, I respectfully request NEPRA to:

- a) Safeguard the rights of existing net metering consumers by exempting them from the application of the new policy;
- b) Review the notified policy through due stakeholder consultation in accordance with best regulatory practices; and
- c) Ensure that any future regulatory changes are prospective in nature and compliant with consumer protection principles.

I request that this complaint be registered, acknowledged, and processed under NEPRA Consumer Affairs procedures, and I may be informed of the outcome accordingly.

Yours sincerely,

Name: Syed Wajahat Hussain Rizwi

Signature (if required): _____

Date: 27Dec 2025

Chairman NEPRA

From: Mail Service <wasijunejo@hotmail.com>
Sent: Tuesday, December 30, 2025 11:05 AM
To: Registrar@nepra.org.pk
Cc: Chairman@nepra.org.pk
Subject: Request for Review/Exemption Under New Net Billing Policy

Dear Sir/Madam,
AoA.

I am writing as a registered Net Metering user to express concern regarding the newly proposed Net Billing Policy, scheduled to take effect from 14 January 2026.

While we support Pakistan's transition to renewable energy, the proposed policy, particularly the purchase rate of Rs. 11.5/unit for new users and Rs. 27/unit for existing users, will adversely impact existing Net Metering investors who installed systems under the previous policy. These users made long-term financial and environmental commitments based on NEPRA's earlier rules.

We respectfully request that NEPRA:

1. Exempts existing Net Metering users from the new purchase rate, or
2. Revises the policy to provide fair compensation aligned with original Net Metering rates, ensuring financial viability and continued investment in rooftop solar.

We urge NEPRA to consider the significant implications for renewable energy adoption, investor confidence, and Pakistan's green energy goals.

Thank you for your consideration. We hope for a fair and equitable resolution.

Sincerely,

Wasiuddin Junejo

15/10, Khayaban Farooq Amanat Shaheed, DHA Phase 7 extension, Karachi.

KE Consumer no. LB 368705

Contract no. 32656152

Contact No: 0300 3068574 Outlook
for Android

Adm. DG-I	Adm. DG-II	Adm. DG-III
Adm. DG-IV	Adm. DG-V	Adm. DG-VI
Adm. DG-VII	Adm. DG-VIII	Adm. DG-IX
Adm. DG-X	Adm. DG-XI	Adm. DG-XII

Forwarded please:

☒ For nec. action ☐ For information

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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/BCM)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA

Licensing Department
Registry No. 35
Date: 31-12-25

Registrar

31.12.25

31.12.25


CHAIRMAN
Dy No. 7492
Date: 30-12-25

Chairman NEPA

From: DR. ASHFAQ NADEEM <drnadeemashfaq@gmail.com>
Sent: Tuesday, December 30, 2025 1:31 PM
To: Chairman@nepra.org.pk

Plz.Dont do that
Met metering should Continue.
Aawam ka kuch Khial karein.

~~Registrar~~



Addl. DG	DD-I	Addl. Dir.	DD-II
AD-I	EO	PS	EIS
TA	OA-I	OA-II	OA-III

NEPA
Licensing Department
Copy No. 34
Date: 01-01-26



31-12-25

Forwarded please:

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUCM)

For kind information, please.

☒ Chairman ☐ 2. M (Tech)
☒ 3. M (Law) ☒ 4. M (Dev)

15166
31-12-25

CHAIRMAN
By No. 7491
Date: 30-12-25

Chairman NEPRA

From: Bilal Babar <bilalbutt.bbbb28@gmail.com>
Sent: Tuesday, December 30, 2025 3:39 PM
To: cad@nepra.org.pk
Cc: Registrar@nepra.org.pk; chairman@nepra.org.pk
Subject: Protest Against new policy

We protest against this new policy

Registrar

Addl. DG-I	<input checked="" type="checkbox"/>	Addl. Dir-I	<input checked="" type="checkbox"/>
AD-I	<input checked="" type="checkbox"/>	PS	<input checked="" type="checkbox"/>
TA	<input checked="" type="checkbox"/>	QA-I	<input checked="" type="checkbox"/>

92

31.12.25

Forwarded please:

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<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/HR/M)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

RECEIVED
Lic. Reg. Dept.
15/165
31.12.25

CHAIRMAN
By No. 7499
Date: 30-12-25

Chairman NEPRA

From: Muhammed Asif Riaz <masifriaz@hotmail.com>
Sent: Tuesday, December 30, 2025 10:09 AM
To: chairman@nepra.org.pk
Subject: Request for review of the current policy on net metering and net billing

Chairman, National Electric Power Regulatory Authority (NEPRA), Islamabad

Subject: Request for review of the current policy on net metering and net billing

Dear Sir,

It is with great respect that I, as a responsible citizen, would like to draw your attention to the current policy of NEPRA regarding net metering and net billing, which has become a cause of concern for the public, especially small consumers, in recent times.

Dear Sir, The aim of promoting solar energy was to ensure affordable, clean and sustainable electricity supply to the public. However, due to the current net billing policy and reduction in purchase rates, not only the consumers who have already installed solar systems are being affected, but also new consumers are hesitant to switch to this renewable energy. This situation is likely to severely harm the development of alternative energy sources in the country.

Moreover, in this era of expensive electricity, rising bills and economic pressure, solar energy was a great facility for the public, but the current policy changes are limiting this facility, which seems to be against the public interest.

Therefore, it is a polite request to you that:

The current policy of net metering and net billing should be reconsidered.

The interests of small and domestic consumers should be protected.

A final decision should be taken after consulting stakeholders and public representatives.

An encouraging and sustainable policy should be introduced for the promotion of renewable energy.

We are fully confident that NEPRA has always taken decisions keeping in mind the public interest and national needs, and positive and fair action will be taken by you in this matter as well.

Thank you very much for your attention and time.

Greetings

Muhammad Asif Riaz

Cnic number - 42201-0428636-9

Mobile number - +923008484799

Date: 30/12/2025

Sent from Outlook for Android

Addl. DG	AD	Addl. Dir.	DD-1
AD-1	AD	AD-1	AD-1
TA	CA-1	CA-1	CA-1

Registrar

31.12.25

Forwarded please:

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For kind information, please.

☒ Chairman 2. M (Tech)
☒ 3. M (Law) 4. M (Dev)

CHAIRMAN
By No. 7476
30-12-25
Date:

NEPRA
Licensing Department
File No. 31-01-26
Date: 31-12-25

Chairman NEPA

From: Arshad Toor <satoor@gmail.com>
Sent: Sunday, December 28, 2025 9:30 PM
To: Chairman@nepra.org.pk
Subject: Net billing.

Totally against the proposed policy. The Govt encouraged the people to install solar and now you want to punish them for spending so much money. Policy is not acceptable at all. Please cancel it

NEPA
Licensing Department
Diary No. 30
01-01-26

Registry

Addl. DG	Addl. Dir	-DD-I
AD-I	AD	ES
TA	CA-I	CA-II
		CA-III

2

31.12.25

Forwarded please:

☒ For next action ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

15176
31.12.25

CHAIRMAN
Dy No. 7428
Date: 29-12-25

Chairman NEPRA

From: shahid muhammad <shahid_chme@yahoo.com>
Sent: Tuesday, December 30, 2025 8:17 AM
To: Chairman@nepra.org.pk; cad@nepra.org.pk; Registrar@nepra.org.pk
Subject: Reject new net billing policy

Dear Sir/Madam,

I am writing this mail with severe concern that we have spent all of our savings to install solar system at home to cope with the situation of heavy electricity bills. If the govt implements new policy of net billing instead of net metering, all of our spent money will go waste. we reject this proposal and policy. We strongly condemn this policy and recommend to reconsider it otherwise we will protest for our rights.

Regards

Yahoo Mail: Search, organise, conquer

Adtl. DG	Adtl. Dir.	DD-I
AD-I	ES	ES
TA	OA-I	OA-II
		OA-III

Registrar

31/12/25

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For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

*15174
31.12.25*

NEPRA
Licensing Department
Diary No. 229
Date: 01-01-26

CHAIRMAN
By No. 7496
Date: 30-12-25

Chairman NEPRA

From: tariqaqil17@gmail.com
Sent: Saturday, December 27, 2025 1:42 PM
To: Chairman@nepra.org.pk
Subject: net metering

this policy will destroy all efforts to end load shedding and reduce the burden on the national grid and why are the old users of solar panels being victimised we have invested very heavily in the solar panels but now it appears that this new policy will mean money down the drain for us Sent from my iPhone

Registrar

2

4

Addl. DG	Addl. Dir.	DD-I
AD-I	AD-II	AD-III
TA	CA-I	CA-II

31.12.25

Forwarded please:

☒ For nec. action ☐ For information

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/Proc)

For kind information, please.

☒ Chairman ☐ 2. M (Tech)

☒ 3. M (Law) ☒ 4. M (Dev)

15169

31.12.25

CHAIRMAN

Dy No. *7468*

Date: *29-12-25*

NEPRA

Licensing Department

Diary No. *41*

Date: *01-01-26*

Chairman NEPRA

From: Hamza Ahmad <hahmad477@gmail.com>
Sent: Monday, December 29, 2025 12:23 PM
To: Chairman@nepra.org.pk
Subject: Net metering policy change is unacceptable

Aoa
Hamza here i am user if net metering since 2023 the policy which is revised is un acceptable we dont need new policy Sent from my iPhone

Registrar

[Signature]

[Signature]

Adm. DG:	Adm. Dir.:	DD-I
AD-I	AD-II	ES
TA	OA-I	CA-I
	OA-II	CA-II

[Signature] 31.12.25

Forwarded please:

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<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIG)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CT/CRM)

For kind information, please.
1. Chairman
2. M (Tech)
3. M (Law) *[Signature]* M (Dev)

NEPRA
Planning Department
File No. 40
Date: 01-01-26

CHAIRMAN
15168
31.12.25
By No. 7467
Date: 29-12-25

Registrar

From: Bilal Babar <bilalbutt.bbbb28@gmail.com>
Sent: Tuesday, December 30, 2025 3:39 PM
To: cad@nepra.org.pk
Cc: Registrar@nepra.org.pk; chairman@nepra.org.pk
Subject: Protest Against new policy

We protest against this new policy

2

Addl. DG-I	Dr.	Addl. Dir. - CD-I
AD-I	EO	ES
TA	CA-I	CA-II

31.12.25

NEPRA
Licensing Department
Copy No. 42
Date: 01-01-26

Forwarded please:

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<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin.)

For kind information, please,

✓ 1. Chairman 2. M (Tech)
✓ 3. M (Law) ✓ 4. M (Dev)

13/60
31.12.25

Chairman NEPRA

Time to Save

From: Ashraf Mirza <ashrafmirza1959@gmail.com>
Sent: Tuesday, December 30, 2025 9:55 AM
To: Chairman@nepra.org.pk

To,
The worthy Chairman NEPRA, Islamabad.

Dear Sir,

With utmost reverence, I have the honour to advance my humble submissions by inviting your kind attention towards the new billing system for solar consumers. This new Net billing system will obviously lead to discouraging the roof top solarization for new as well as old consumers who are significantly contributing to generate solar energy which is cheaper and environment friendly source of energy. The NEPRA authority has to encourage the generation of solar energy in the larger interest of this progressive country and the public at large. But the new policy will severely discourage the people and consequently the prosumers will not produce solar power for grid but only for their own use.

This will drastically reduce solar power generation. Ultimately IPPs will be the only solution. Definitely IPPs will generate costly electricity and Ultimately Govt will need huge amount of dollars to balance the payments and the only way will be to get loan from international agencies like IMF. This will disturb the country's economy.

Kindly reconsider the issue and the present net metering system may not be changed in the larger interest of the country and the public.

Regards.

..... one of the
Expected Affectee by this new policy.

Adl. DG-I	Adl. Dir.	DD-I
AD-I	PS	ES
TA	CAI	CA-II

Registrar

31.12.25
15172

31.12.25

NEPRA
Licensing Department
File No. 32
Date 01-01-26

Forwarded please:	
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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUCM)

For kind information, please.
✓ Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN
By No. 7475
Date: 30-12-25



Chairman NEPRA

From: Mohammad Younis <myounis300@gmail.com>
Sent: Tuesday, December 30, 2025 10:35 AM
To: Chairman@nepra.org.pk
Cc: Chairman@nepra.org.pk

To,
The worthy Chairman NEPRA, Islamabad.

Dear Sir,

With utmost reverence, I have the honour to advance my humble submissions by inviting your kind attention towards the new billing system for solar consumers. This new Net billing system will obviously lead to discouraging the roof top solarization for new as well as old consumers who are significantly contributing to generate solar energy which is cheaper and environment friendly source of energy. The NEPRA authority has to encourage the generation of solar energy in the larger interest of this progressive country and the public at large. But the new policy will severely discourage the people and consequently the prosumers will not produce solar power for grid but only for their own use.

This will drastically reduce solar power generation. Ultimately IPPs will be the only solution. Definitely IPP s will generate costly electricity and Ultimately Govt will need huge amount of dollars to balance the payments and the only way will be to get loan from international agencies like IMF. This will disturb the country's economy.

Kindly reconsider the issue and the present net metering system may not be changed in the larger interest of the country and the public.

Regards.

..... one of the
Affectee by this new policy.

Sent from my iPhone

Addl. DG	✓	Addl. Dir	DD-I
AD-I	RO	PS	E/S
TA	OA-I	OA-II	OA-III

NEPRA
Licensing Department
Diary No. 066
Date: 01-01-26

Registrar

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/RCM)

For kind information, please.

✓ Chairman 2. M (Tech)
✓ 3. M (Law) 4. M (Dev)

15170
31-12-25

CHAIRMAN
By No. 7477
Date: 30-12-25

Chairman NEPRA

From: Mohammad Younis <myounis300@gmail.com>
Sent: Tuesday, December 30, 2025 10:38 AM
To: Chairman@nepra.org.pk
Subject: Fwd: cancellation of proposed solar policy

Sent from my iPhone

Begin forwarded message:

From: Mohammad Younis <myounis300@gmail.com>
Date: 30 December 2025 at 10:34:32 AM GMT+5
To: Chairman@nepra.org.pk
Cc: Chairman@nepra.org.pk

To,
The worthy Chairman NEPRA, Islamabad.

Dear Sir,

With utmost reverence, I have the honour to advance my humble submissions by inviting your kind attention towards the new billing system for solar consumers. This new Net billing system will obviously lead to discouraging the roof top solarization for new as well as old consumers who are significantly contributing to generate solar energy which is cheaper and environment friendly source of energy. The NEPRA authority has to encourage the generation of solar energy in the larger interest of this progressive country and the public at large. But the new policy will severely discourage the people and consequently the prosumers will not produce solar power for grid but only for their own use.

This will drastically reduce solar power generation. Ultimately IPPs will be the only solution. Definitely IPP s will generate costly electricity and Ultimately Govt will need huge amount of dollars to balance the payments and the only way will be to get loan from international agencies like IMF. This will disturb the country's economy.

Kindly reconsider the issue and the present net metering system may not be changed in the larger interest of the country and the public.

Regards.

..... one of the
Affectee by this new policy.

Sent from my iPhone

Chairman NEPRA

From: Nazar Iqbal <nazar422iqbal@gmail.com>
Sent: Monday, December 29, 2025 8:59 PM
To: cad@nepra.org.pk
Cc: Chairman@nepra.org.pk
Subject: Urgent Objection to Proposed Net Billing Policy and Request for Exemption of Existing Net Metering Consumers

Addl. DG	✓	Addl. Dir.	DD-I
AD-I	✓	PS	E/S
TA	✓	OA-I	OA-III

Respected Chairman and Members of NEPRA,

I am writing to express my serious concern and strong objection to the proposed Net Billing Policy, scheduled to take effect from 14 January 2026, as recently published on the NEPRA website.

The proposed policy, particularly the drastic reduction in purchase rates and its applicability to existing net metering licensees, will have severe financial implications for consumers who invested in solar systems under the current Net Metering

framework. These investments were made in good faith based on clearly defined policies, payback periods, and long-term assurances. Applying the new policy to existing users undermines regulatory certainty and public trust.

While it is noted that the proposed purchase rate for existing users is stated as Rs. 27/unit compared to Rs. 11.5/unit for new users, even this change significantly alters the originally approved economic model and will negatively impact thousands of households and businesses.

Furthermore, the public hearing process appears to have had limited and restricted participation, which does not adequately reflect the views and concerns of the majority of affected consumers.

In light of the above, I respectfully request NEPRA to:

- 1. Completely exempt existing net metering consumers from the proposed Net Billing Policy**, and allow them to continue under the original net metering terms for the approved system life.
- 2. Conduct broader and transparent stakeholder consultations** with meaningful consumer participation before finalizing any such policy changes.
- 3. Reconsider the proposed purchase rates** to ensure fairness, sustainability, and continued encouragement of renewable energy adoption in Pakistan.

Net metering has played a vital role in reducing grid load, promoting clean energy, and empowering consumers. Abrupt and retrospective policy changes risk reversing these gains and discouraging future investments in renewable energy.

I urge NEPRA to reconsider this policy in the larger public interest and uphold regulatory consistency and consumer confidence.

Thank you for your time and consideration.

Yours sincerely,
Nazar Iqbal

Forwarded please:

☒ For rec. action ☐ For information

<input checked="" type="checkbox"/> DG (Cic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIC/HR)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

By No.

Date: 30-12-25

Chairman NEPRA

From: Dildar Ahmad <dildarahmadbhatti@gmail.com>
Sent: Monday, December 29, 2025 9:37 PM
To: Chairman@nepra.org.pk
Subject: Application for continuation of net metering billing system as per old policy.

To,
The worthy Chairman NEPRA, Islamabad.

Dear Sir,

With utmost reverence, I have the honour to advance my humble submissions by inviting your kind attention towards the new billing system for solar consumers. This new Net billing system will obviously lead to discouraging the roof top solarization for new as well as old consumers who are significantly contributing to generate solar energy which is cheaper and weather friendly source of energy. The NEPRA authority has to encourage the generation of solar energy in the larger interest of this progressive country and the public at large. But the new policy will severely discourage the people and consequently the prosumers will not produce solar power for grid but only for their own use.

This will drastically reduce solar power generation. Ultimately IPPs will be the only solution. Definitely IPP s will generate costly electricity and Ultimately Govt will need huge amount of dollars to balance the payments and the only way will be to get loan from international agencies like IMF. This will disturb the country's economy.

Kindly reconsider the issue and the present net metering system may not be changed in the larger interest of the country and the public.

Regards.

Dildar Ahmad one of the
Affectee of this new policy.

Chairman NEPRA

From: Qader Bakhsh <qaderbakhsh@yahoo.com>
Sent: Saturday, December 27, 2025 4:48 PM
To: cad@nepra.org.pk
Cc: Chairman@nepra.org.pk
Subject: Draft NEPRA (Prosumer) Regulations, 2025 - Adverse impact on BTPL consumers

The Registrar
(NEPRA)

Sir,

NEPRA
9-12-25
Licensing Department
Diary No. 03
Date: 01-01-26

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/BCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Addl. DG	Dir.	Addl. Dir.	DD-I
AD-I	HD	PS	TS
TA	OA-I	OA-II	OA-III

Registrar

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Qader Bakhsh

House No.241/2, 32nd Street

Khayaban e Qasim

Phase 8

DHA Karachi

Cell number: 03218922617

CHAIRMAN
DY No. 7418
Date: 29-12-25

15186
31.12.25

From: Rashid Alvi Alvi <alvi.168@gmail.com>
Sent: Tuesday, December 30, 2025 3:21 PM
To: registrar@nepra.org.pk; alvi49gb@gmail.com
Subject: Observations on Draft NEPRA Prosumer Regulations-2025 and Additional Adverse Impact on BTPL Consumers

The Registrar NEPRA
 NEPRA Headquarters Islamabad.

Adm. DG	Adm. Dir.	DD-I
AD-I	AD-II	AD-III
TA	CA-I	CA-II

Dear sir,

I hereby submit my observations/ objections to the Draft NEPRA (Prosumer) Regulations 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/ prosumer framework will cause great financial loss to solar consumers who installed solar systems under an approved legal framework with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive the consumers from major benefits of their self-generated, relatively cheaper electricity and will badly affect the real purpose of net-metering initiatives.

Moreover as a [BTPL] electricity consumer, I am already being adversely affected by;

- a- An arbitrary ~30% deduction from total monthly export units from BTPL solar consumers, saying they were consumed by the IESCO distribution system and the IESCO doesn't pay to BTPL for them.
- b- Illegal charges imposed under the guise of tariff adjustments and other manners.
- c- Misc.Charges routinely added to monthly electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

Forwarded please:

☒ For reg. action ☐ For Information

<input checked="" type="checkbox"/> DG (Inc.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> ST.A	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CICM)

For kind information, please.

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible. Such an approach is unjust and contrary to the objectives of Renewable Energy Promotion, Regulatory Certainty and Consumer Protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
 Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
 Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[Name]

[BTPL Consumer /
[Address / Phase –

From: Umar Tariq <umar.tariq@soco-engineers.de>
Sent: Tuesday, December 30, 2025 3:29 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

From: Ajmal Akhtar <majmalakhtar@gmail.com>
Sent: Tuesday, December 30, 2025 8:39 AM
To: Chairman@nepa.org.pk
Subject: Opposition to NEPA s New Net Billing Policy

Dear Chairman NEPA,

I strongly oppose the new Net Billing Policy, effective January 14, 2026, as it unfairly disadvantages net metering users. The proposed purchase rates of Rs. 27 for old users and Rs. 11.5 for new users are unacceptable.

I request permission for ALL applied customers. The policy change will discourage renewable energy adoption and harm consumers. I urge reconsideration of this policy, ensuring fairness and transparency.

Sincerely,
 M. Ajmal Akhtar
 Fazal Town, Multan
 Cell # 0300-8488976

Adm. DG-I	Adm. DG-II	Adm. DG-III
AD-I	AD-II	AD-III
TA	OA-I	OA-II
		OA-III

Registrar

31.12.25

Forwarded please:

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<input type="checkbox"/> SA (P&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trt)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (L.F)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (L.F & M)

For kind information, please.
 1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

*15/1/26
31-12-25*

CHAIRMAN
 Dy No. 7497
 Date: 30-12-25

From: AM Riaz Shaikh <r_shaikh47@hotmail.com>
Sent: Tuesday, December 30, 2025 3:20 PM
To: cad@nepra.org.pk; Chairman@nepra.org.pk
Subject: Netmetering policy: user KE acct # 0400012446029

Dear sir,

1. I have 15 kva Hybrid solar system installed at my billing residence since last 4 yrs, when Govt was encouraging solarization, with a 10 yrs contract with KE extendable.
2. My investment in solar system installation & recently replaced 12 tubular batteries is considerable which was based on the saving that were to incur.
3. Pl don't change the grid import & export rates at least for old user of Solar system.

Regards,
Air Marshal Riazuddin Shaikh (R)
Cell +922008216849
All billing & contact details with KE.

Sent from my iPhone

Adm. DG	Adm. DG	Adm. DG	Adm. DG
Adm. DG	Adm. DG	Adm. DG	Adm. DG
Adm. DG	Adm. DG	Adm. DG	Adm. DG

Registrar

31.12.25

NEPRA
Licensing Department
Diary No. 39
Date:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CICM)

For kind information, please.

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<input checked="" type="checkbox"/> 3. M (Law)	<input checked="" type="checkbox"/> 4. M (Dev)

15164
31-12-25

CHAIRMAN
7498
DY No. 30-12-25
Date:

Chairman NEPRA

From: Jahanzeb Khan <jahanzeb.khan36@gmail.com>
Sent: Wednesday, December 24, 2025 9:47 AM
To: Chairman@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 -- Additional Adverse Impact on BTPL Consumers

The
Registrar
24-Dec-2025
NEPRA
Islamabad

NEPRA
Licensing Department
Diary No. 2162
Date: 31-12-25

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For kind information, please,
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN

Dy No. 7345

Date: 24-12-25

SUBJECT: OBJECTIONS TO DRAFT NEPRA (PROSUMER) REGULATIONS, 2025 -- ADDITIONAL ADVERSE IMPACT ON BTPL CONSUMERS

Dear Sir;

I submit my formal objections to the Draft NEPRA (Prosumer) Regulations, 2025, published via press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious and immediate financial loss to consumers like me who installed solar systems during 2022 under an approved legal regime and with legitimate expectations of affordable electricity and regulatory certainty. Any reduction in the export value of self-generated electricity, adverse changes to settlement mechanisms, or retrospective application of new charges will deprive me of the economic benefits that justified their investment and will defeat the very purpose of net-metering.

ADJUDG	✓	ADD. DIR	CO-1
ADP	✓	IS	ES
TS	✓	CAPI	CA-III

BREACH OF LEGITIMATE EXPECTATIONS AND REGULATORY CERTAINTY

Many households and businesses invested in rooftop solar based on the existing legal and regulatory framework. Retrospective or punitive changes would amount to a breach of legitimate expectations, undermine the rule of law, and damage investor and consumer confidence in Pakistan's energy policy.

CONFLICT WITH NATIONAL AND INTERNATIONAL SUSTAINABILITY COMMITMENTS

These proposed changes are inconsistent with Pakistan's stated climate and sustainability commitments, including obligations under the Paris Agreement and the United Nations Sustainable Development Goals, particularly those relating to affordable, reliable, and clean energy and climate action. Discouraging distributed renewable generation at this stage would set back national efforts to reduce emissions, improve energy security, and meet internationally-pledged targets.

DISPROPORTIONATE BURDEN ON PROSUMERS AND BTPL CONSUMERS

As a consumer of BTPL, I am already adversely affected by:

- Arbitrary deduction/reduction of solar export units;
- Non-transparent charges imposed under the guise of tariff adjustments;
- **“Misc. Charges”** routinely added to electricity bills.

In this context, the draft regulations would further aggravate the financial exploitation of solar consumers by effectively using prosumers to offset KE/DISCO inefficiencies, losses, theft, and non-recovery for which consumers are not responsible. This approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, consumer protection, and regulatory fairness.

WIDER ECONOMIC AND SYSTEM IMPACTS

Discouraging rooftop solar will also harm broader public interests: it will slow job creation in the local solar industry, increase reliance on expensive centralized generation, raise overall system costs for all consumers, and reduce the resilience and flexibility that distributed generation provides to the grid. It will also undermine efforts to diversify Pakistan's energy mix and to lower peak demand pressures on the transmission and distribution network.

TRANSPARENCY, ACCOUNTABILITY AND PROCEDURAL FAIRNESS

The draft regulations, as currently framed, lack adequate safeguards to prevent misuse of prosumer revenues to cover unrelated DISCO liabilities. There is insufficient transparency around billing adjustments, export accounting, and the methodology for any new charges. There is also no clear, independent mechanism for auditing DISCO practices or for timely redress of consumer grievances.

RELIEF SOUGHT :

Considering the foregoing, I respectfully request NEPRA to:

- 1.** Reject any adverse or retrospective changes that would reduce the export value, alter settlement mechanisms, or otherwise penalize existing net-metering consumers who invested under the prior legal regime.
- 2.** Grandfather existing prosumers under the rules and tariffs in place at the time of their interconnection, with any future changes applied only prospectively and after adequate notice and consultation.
- 3.** Ensure prosumers are not used to subsidize DISCO losses, theft, or non-recovery. Any cost-recovery measures must be transparent, justified, and borne in a manner consistent with law and regulatory precedent.
- 4.** Mandate transparent billing and independent audits of export accounting, meter readings, and any “miscellaneous” charges, with clear penalties for unlawful deductions or manipulations.
- 5.** Require a public, evidence-based impact assessment and a meaningful stakeholder consultation process (including consumer groups, prosumer associations, industry representatives, and independent experts) before finalizing any changes.

6. Provide a clear grievance redressal and compensation mechanism for consumers who have suffered arbitrary deductions, illegal charges, or non-transparent billing practices, particularly BTPL consumers.

7. Align the final regulations with Pakistan's climate and energy commitments, ensuring they support, rather than hinder, the national transition to sustainable, distributed generation.

These measures will protect consumers, preserve regulatory credibility, support Pakistan's sustainability goals, and maintain a stable environment for continued private investment in clean energy.

I request that these objections be placed on record and given full and fair consideration before any finalization of the regulations. I am prepared to provide further evidence, billing examples, or testimony to support these objections if required.

Also please acknowledge the receipt of this email.

Kind regards;

Engr. JAHAN ZEB KHAN (Net Metering Consumer of Karachi Electric)

Cell: 0301-2249583

M-10,

KDA Overseas Bungalows,

Block 16-A,

Gulistan-e-Johar,

Karachi.

From: Asrar Munsab <munsabasrar@gmail.com>
Sent: Tuesday, December 23, 2025 7:36 PM
To: Chairman@nepra.org.pk
Subject: New net metering policy

Respect Sir

With deu respect, we as a consumer of IESC disagree with the policy of new regulations for Net metering. We hav spend a lot of amount for from our savings for betterment of life's. Plz reconsider it.
 Regards

NEPRA
 Licensing Department
 File No. 2464
 Date: 21-12-25
 Registrar

29/12

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<input checked="" type="checkbox"/> SCA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (a:DCM)

For kind information, please.

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

[Signature]

24/12/25
 09051

[Stamp]

CHAIRMAN
 Dy No. 7331
 Date: 24-12-25

Chairman NEPA

From: Muhammad Butt <mabutt23447@gmail.com>
Sent: Tuesday, December 23, 2025 9:10 PM
To: Chairman@nepra.org.pk

Dear Chairman ,
The new Netmetering policy is not acceptable by the general public. It must not be implemented.
Look at you people; buying @11 and selling at @55. For heavns sake. First stop free electricity and
the deliberate thefts. Focus on improving performance rather fleecing money from the users.

NEPA

Licensing Department
Diary No. 2165
Date: 31-12-25

~~Registrar~~

Forwarded please:

☒ For nec. action ☐ For Information

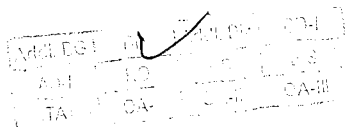
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (w/ECM)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN
Dy No. 7335
Date: 24-12-25

24/21/52
95051



From: Khalid Salim <khalidsalim54@gmail.com>
Sent: Tuesday, December 23, 2025 8:30 PM
To: Chairman@nepra.org.pk
Subject: Net Billing Policy

Dear Sir,

I want to express my deep concern and protest against the proposed net billing policy which I feel will be a gross injustice to a large number of net metering consumers.

Yours truly,
Khalid Mahmud Salim

Registrar

NEPRA
Licensing Department
Diary No. 2166
Date: 31-12-25

Forwarded please:

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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (TBCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN
Dy No. 7333
Date: 24-12-25

AD-1	AD-2	AD-3	AD-4
AD-5	AD-6	AD-7	AD-8
AD-9	AD-10	AD-11	AD-12

From: Muhmmad Qadeer <muhmmadqadeer58@gmail.com>
Sent: Tuesday, December 23, 2025 7:01 PM
To: Chairman@nepra.org.pk

No change in the net metering policy will be accepted. we have spent huge amount on installation of solar system we will knock all doors of law to fight against this injustice. For God sake have mercy on us

~~Registrar~~

✓ 28/12

NEPRA
Licensing Department
Diary No. 24-12-25
Date: 31-12-25

Forwarded please:
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For kind information, please.
✓ Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

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29/12/25

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MPL DG ✓ 1 Addl Dir 2 Dir
AD-1 10 10 10
TAP-1 10A-1 10A-2 10A-3

CHAIRMAN
By No. 7329
Date: 24-12-25

From: Muhammad Ihtisham <aitesam710@gmail.com>
Sent: Tuesday, December 23, 2025 10:57 AM
To: registrar@nepra.org.pk
Subject: Objection under section 47(3) of the NEPRA ACT

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA’s website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

“Misc.Charges” routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Muhammad Ishaque

[BTPL Consumer # 01060221001462100
[Address / Phase:

Addl. DG	DL	Addl. Dir	-DD-I
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TA	*OA-I	*OA-II	*OA-III

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2168
Date: 31/12/2025
14991
29/12/2025

6

House 1669 Street 63
Ali Block
Phase 8
Bahria town

From: trahim58 <trahim58@hotmail.com>
Sent: Tuesday, December 23, 2025 1:19 PM
To: registrar
Subject: Objection to draft NEPRA(prosumers) Regulations , 2025- Additional Adverse Impact on BTPL Consumers

Dear Sir , we have installed solar panels thru our hard earned lifetime income as per the govt policy and with great expectation of getting rid of exorbitant and unaffordable electricity bills.

The Registrar
 (NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers



I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
 Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
 Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Addl. DG I	Addl. Dir.	DD-I
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For kind information, please,

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

NEPRA
 Licensing Department
 Diary No. 2169
 Date: 31/12/25

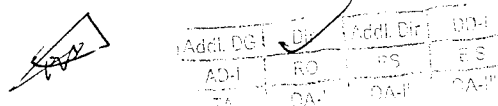
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Regards ,
BTPL Consumer
Tariq Rahim

From: Faisal Naseer <faisal_naseerpk@hotmail.com>
Sent: Tuesday, December 23, 2025 1:20 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers.

The Registrar
 (NEPRA)
 Islamabad



Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers.

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net metering / prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction / reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Miscellaneous Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers & Ensure that prosumers are not penalized to cover DISCO / Utility losses and theft of electricity and protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

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<input checked="" type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUCM)

For kind information, please.

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

NEPRA
 Licensing Department
 Diary No. 217-0
 Date: 31-12-2025

24/11/25
 18005

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These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Faisal Naseer
BTPL Consumer
Address - Bahria Town / Phase – 2, Islamabad

From: Chaudhry Qaiser <qaiserchaudhry@hotmail.com>
Sent: Tuesday, December 23, 2025 1:27 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Addl. DG	DR	Addl. Dir	DD-I
AD-I	EO	PS	ES
QA-I	QA-II	QA-III	QA-IV

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

Submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

An approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Chaudhry Muhammad Qaiser

BTPL Consumer: 01060221002365600.

Handwritten signature of Chaudhry Muhammad Qaiser

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Forwarded please:

☒ For rec. action

☐ For Information

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<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/ECM)

For kind information, please,

1. Chairman 2. M (Tech)

3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Dy. No. 2171
Date: 23/12/2025

24/12/2025
15204

House 1199, Main Boulevard, Ali Block, Bahria Town Phase-8, Rawalpindi.

Registrar

From: Mazhar Shah <mazhar.a.shah51@gmail.com>
Sent: Tuesday, December 23, 2025 1:31 PM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

Proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Mazhar A. Shah

BTPL Consumer
House 46, Street 3
Behria Avenue Phase 7,

Addl. DG	Dir.	Addl. Dir.	DD-
AD-I	RO	PS	ES
TA	QA	QA-II	QA-III

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Forwarded please:	
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CICOM)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2178
Date: 23/12/25
15003
24/12/26

Behria Town
Islamabad.

Registrar

From: Aziz Ahmed <azizahmed09@gmail.com>
Sent: Tuesday, December 23, 2025 1:33 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 - Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Disc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

AZIZ AHMED

BTPL Consumer
H.No 298, Street 2, Sector A
Phase 8,
Bahria Town
Rawalpindi
Mobile: 0300-8235913

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
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<input checked="" type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECOM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2173
Date: 24-12-25

Adtl. DG	Dir	Adtl. Dir	DD
AD-I	RO	PS	E/S
TA	OA-I	OA-II	OA-III

1502
24/12/25

Registrar

From: raheel qayyum <raheelqayyum@hotmail.com>
Sent: Tuesday, December 23, 2025 12:23 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Sir,

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These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Raheel Qayyum

[BTPL Consumer /
H no 68 C, Street 47A, Sector F, DHAI-R Phase 1, Rawalpindi

Addl. DG	Dir	Addl. Dir	DD-1
AD-I	RO	PS	ES
TA	QA-I	QA-II	QA-III

Forwarded please:

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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (L.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/Proc)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2175
Date: 31-12-25

15000
24/12/25

Sent from [Outlook for Android](#)

From: mazhar mahmood <mazharmahmood1949@gmail.com>
Sent: Tuesday, December 23, 2025 11:35 AM
To: registrar@nepra.org.pk
Subject: Re:

Adl. DG	Dir	Adl. Dir	DD-I
AD-I	RO	PS	E.S
TA	QA-I	QA-II	QA-III

On Tue, 23 Dec 2025 at 10:53, mazhar mahmood <mazharmahmood1949@gmail.com> wrote:

The Registrar
 (NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

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These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Mazhar
 1

Forwarded please:

☒ For nec. action ☐ For information

<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECOM)

For kind information, please,

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

NEPRA
 Licensing Department
 May No. 2175
 Date: 31-12-25

14988
 24/12/25

6

Mazhar Mahmood

[BTPL Consumer meter number 40014297

House 46, Street 4, phase 6

Bahria Town Rawalpindi

Subject:

FW: Solar policy revision

From: Tajammul Hussain <tajammul9519@yahoo.com>
Sent: Tuesday, December 23, 2025 11:51 AM
To: registrar@nepra.org.pk
Subject: Solar policy revision

Addl. DG	Dir	Addl. Dir	DD-I
AD-I	RO	PS	ES
CA	CA	CA	CA

Forwarded please:

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIBCM)

For kind information, please.

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

The Registrar
 (NEPRA)
 Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

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Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Ham

NEPRA
 Licensing Department
 Diary No. 2176
 Date: 31/12/2025

94886
 24/12/25

6

Yours sincerely,
Tajammul Hussain

BTPL Consumer
H No 2080 street 66 Bahria town phase 3 Islamabad.
Yahoo Mail: Search, organise, conquer

From: irfan khan <iakjandj@yahoo.com>
Sent: Tuesday, December 23, 2025 11:40 AM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
 (NEPRA)
 Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

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Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
 Irfan Ali Khan

BTPL Consumer
 House No. 1533

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For Information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> STA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EUCM)

For kind information, please,
 1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

Adtl. DG	Adtl. Dir	Adtl. Dir	Adtl. Dir
AD-I	RO	PS	E/S
OA-I	OA-I	OA-I	OA-I

NEPRA
 Licensing Department
 Diary No. 2477
 Date: 24/12/25

14997
 24/12/25

1

[Signature]

Street 52
Phase 3
Bahria Town
Islamabad
Yahoo Mail: Search, organise, conquer

Chairman NEPRA

From:
Sent:
To:
Cc:
Subject:

Zahid Riaz <zahidriaz80@gmail.com>
Tuesday, December 23, 2025 7:28 PM
registrar@nepra.org.pk
Chairman@nepra.org.pk; cad@nepra.org.pk; memberatariff@nepra.org.pk
Concerns Regarding Proposed Gross Metering Framework for Rooftop Solar Consumers

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
<input type="checkbox"/> DG (Gen.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (MSE)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input checked="" type="checkbox"/> ADG (T+T)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SCA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/UCM)

For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Dear Registrar,
National Electric Power Regulatory Authority (NEPRA),
Islamabad

I hope this message finds you well.

I am writing as a concerned electricity consumer and prospective rooftop solar user to respectfully register serious concerns regarding the proposed shift from net metering to a gross metering framework for new distributed solar installations.

Although I fully appreciate NEPRA's responsibility to safeguard grid stability, address revenue sustainability of DISCOs, and ensure fairness across consumer categories, the proposed gross metering mechanism raises significant practical and economic challenges for residential consumers in Pakistan, which merit reconsideration.

First, gross metering fundamentally weakens the economic rationale for rooftop solar for households. Under the proposed framework, consumers are required to purchase all electricity consumed at full retail tariffs while selling all solar generation at a substantially lower feed-in rate. This accounting separation effectively nullifies the benefit of self-consumption, even when solar power is generated and used simultaneously within the premises. As a result, households are forced into a **"sell cheap, buy expensive"** structure that materially increases payback periods and, in many cases, renders solar financially unviable.

Second, this approach disproportionately affects middle-income households who have adopted solar not as commercial generators, but as a hedge against rising tariffs, load-shedding, and supply uncertainty. Many such consumers rely on **bank financing** to install rooftop systems. Under gross metering, **fixed loan repayments combined with continued high electricity bills can actually increase monthly financial burden**, undermining consumer trust in regulatory predictability.

Third, gross metering fails to recognize the physical reality of distributed generation. **Rooftop solar reduces local demand on the grid, lowers transmission and distribution losses, and defers network investment.** Treating all generated energy as exported, regardless of instantaneous self-consumption, ignores these system-level benefits and discourages behavior that would otherwise reduce peak demand stress.

Fourth, the proposed framework risks slowing Pakistan's distributed **renewable energy adoption** at a time when energy affordability, import dependence, and climate commitments require acceleration rather than contraction. International experience suggests that abrupt policy reversals in rooftop solar regimes lead to market stagnation, legal disputes, and loss of investor and consumer confidence.

In light of these concerns, I respectfully urge NEPRA to consider alternative approaches, such as:

- **Retaining net metering for residential consumers up to a defined capacity threshold;**
- Introducing a hybrid or net-billing model that preserves self-consumption benefits while rationalizing export compensation;
- Explicitly recognizing behind-the-meter self-consumption as non-billable energy;
- Conducting transparent stakeholder consultations with residential consumers before finalizing the framework.

My intention in writing is not to oppose regulatory reform, but to advocate for a **balanced approach** that protects the grid and DISCO revenues without inadvertently penalizing responsible electricity consumers who have invested in clean, distributed energy solutions in good faith.

I sincerely hope NEPRA will take these consumer-level implications into account while finalizing its policy direction. I would be grateful if these concerns could be formally acknowledged and considered as part of the regulatory process.

Thank you for your time and attention.

Yours sincerely,

Dr. Zahid Riaz

MBA (IBA, Karachi), MPhil and PhD (UNSW, Australia).

Mobile. 0300 856 2587.

From: Zahid Mian <captmian46@icloud.com>
Sent: Tuesday, December 23, 2025 7:57 PM
To: Chairman@nepra.org.pk
Cc: Capt Zahid Mian
Subject: Net Metering

Sent from my iPhoneThe Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

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These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Zahid M Mian

[BTPL Consumer /

Address. 85/2, 31st Street Phase V-Extension DHA Karachi

Forwarded please:

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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> DG (L&T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Demand action

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dov)

NEPRA
Licensing Department
Date: 24/12-25
DY NO: 7332
CHAIRMAN

From: Hamid Rafique <hamidrafique_786@hotmail.com>
Sent: Tuesday, December 23, 2025 8:47 PM
To: cad@nepra.org.pk
Cc: chairman@nepra.org.pk
Subject: Complaint

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

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Yours sincerely,

Dr Hamid Rafique

H.no 73 st 2 . Sector A . Bahria phase 8 RWP

Adm. DG	✓	Adm. DG	EDH
AD-IT	✓	PS	EE
TA	✓	CAH	CAH

Forwarded please:

☒ For no action ☐ For information

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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ICRM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2186
Date: 23-12-25

CHAIRMAN
By No. 7334
Date: 24-12-25

From: Jamil Ahmad <jamilahmad333@yahoo.com>
Sent: Wednesday, December 24, 2025 9:34 AM
To: Chairman@nepra.org.pk
Subject: : Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

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These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Jamil Ahmad

/House No 414, Street 14,

Sector F/7, Phase-6, Hayatabad, Peshawar

Forwarded please:

☒ For reg. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/REG)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dov)

AD-1	AD-2	AD-3	AD-4
AD-5	AD-6	AD-7	AD-8
AD-9	AD-10	AD-11	AD-12

Date: 24-12-25

Dy No: 7344

CHAIRMAN

NEPRA

Licensing Department

Bilal No. 2181

Date: 24-12-25

Chairman NEPRA

From: ali khan <ali.gauher@gmail.com>
Sent: Tuesday, December 23, 2025 11:32 AM
To: regesterar@nepra.org; chairman@nepra.org.pk

To: The Regesterar (NEPRA) Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

Registrar

[Signature]

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

Unically the electricity produced by the IPPs is bought at more than triple the rate of poor consumers producing 100% clean energy from their households premissis.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery

distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[A G Khan]

Addl. DG	✓	Addl. Dir	DD-Inv
AD-I	RO	PS	EIS
TA*	POA-I	OA-II	OA-III

[BTPL Consumer /
[Address / Phase – 3 , Rd. D H. 693 ,Bahria Islamabad

0333 900 9006

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For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Licensing Department
Diry No. 2/18-25
Date: 23/12/25

15078
28/12/25

CHAIRMAN
7311
23-12-25

Chairman NEPRA

From: Shahbaz Khan <shahbaz92811@gmail.com>
Sent: Sunday, December 28, 2025 10:12 PM
To: Chairman@nepra.org.pk

New policy regarding net metering of new and old licensees is NOT agreed / acceptable to me...At least the old licensees should be exempted from new policy.

Registrar

Has

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For kind information, please.

☒ Chairman 2. M (Tech)
☒ M (Law) ☒ M (Dev)

NEPRA

Licensing Department

Copy No. 2157

Date: 31.12.25

Addl. DG	Addl. Dir.	DD-1
AD-I	RO	PS
STAT-I	AOA-I	AOA-II
		AOA-III

2

15/19
30.12.25

DY No. 7429
Date: 29-12-25

CHAIRMAN

Chairman NEPRA

From: shaista mir <shaistamirkhan1957@gmail.com>
Sent: Monday, December 29, 2025 7:46 AM
To: chairman@nepra.org.pk
Subject: Proposed changes to Net metering

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EBCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dov)

To,
The Chairman,
National Electric Power Regulatory Authority (NEPRA),
Islamabad.

Respected Sir,

Assalam-o-Alaikum.

I am writing to respectfully share some considered concerns regarding the ongoing discussions and potential policy shift from net metering to net billing. As a concerned citizen, I appreciate the complex challenges faced by the power sector and commend NEPRA's efforts to ensure its sustainability.

However, before finalizing such a significant policy decision, I humbly urge a moment of profound reflection on its potential long-term ramifications. Historical precedents suggest that the full impact of net metering on IPPs and DISCOs was not entirely anticipated at its inception. There is a risk that a shift to net billing, while intended to address certain fiscal concerns, may trigger a wave of public adaptation—through technical and consumption adjustments—that could deliver outcomes contrary to the policy's core objectives.

My technical assessment leads me to believe that this could, within a relatively short timeframe, exacerbate the financial challenges for IPPs and DISCOs, potentially leading to further losses and complications. The public's response to economic signals is often innovative and can circumvent intended controls, possibly resulting in another cycle of unforeseen consequences.

Therefore, I implore the authority to "think before you leap." A more holistic and permanent remedy, in my view, lies in a dual approach:

1. Reducing the base electricity price across the board to alleviate the burden on all consumers and stimulate economic activity.
2. Revisiting the tariff structure to genuinely encourage higher consumption from the grid through attractively lower incremental tariffs for higher usage bands.

This strategy would naturally enhance the viability of utility-supplied power, increase offtake from the national grid, and improve the capacity utilization and financial health of IPPs and DISCOs. Concurrently, it would adjust the financial calculus of solar adoption organically, without necessitating a policy change that may be perceived as anti-public and could stifle the genuine progress made in distributed generation.

NEPRA
Licensing Department
Diary No. 2158
Date: 31-12-25

Adtl. DG	Adtl. Dir.	DD
AD-I	RO	PS
TA	QA-I	QA-II

CHAIRMAN
Dy No. 7430
Date: 29-12-25

I trust in NEPRA's wisdom and commitment to a balanced, equitable, and sustainable power future for Pakistan. I respectfully submit these points for your thoughtful consideration in the broader interest of the sector and the nation.

Thank you for your time and attention.

Sincerely,

Shaista Mir Khan
Lt Col (Retd)
Cell #03338835577

Chairman NEPRA

From: Mansoor Saeed <mansoor.saeed217@gmail.com>
Sent: Wednesday, December 24, 2025 7:32 AM
To: Chairman@nepra.org.pk
Subject: Net Metering

End of net metering for existing customers will be highly unjust. People will loose confidence in the govt policies. How can NEPRA allow power companies to recover their inefficiencies from the consumers. As Chairman NEPRA you have the official and moral duty to protect the interest of consumers, any act of your's contrary to the interest of the consumer will amount to breach of your official duty.

Regards.

Mansoor.Saeed.

~~Registrar~~

✓ 29/12

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Addl DG	Dir	Addl Dir	DD-I
AD-I	RO	PS	ES
TA	OA-I	OA-II	OA-III

From: shagufta baluch <shaguftabaluch@gmail.com>
Sent: Tuesday, December 23, 2025 10:54 PM
To: Chairman@nepra.org.pk
Subject: New Policy on Net Metering

Sir, we the old net metering users/licencies should be exempted from this restrictions policy. Since we being retired pensioners have invested heavily in solar energy should be exempted from this policy.

Registrar

29/12

NEPRA
 Licensing Department
 Date: 21/12/2025
 (Signature)

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For kind information, please.

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

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Addl. DG	Dir.	Addl. Dir.	DD-I
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TA	CA-I	CA-II	CA-III

CHAIRMAN
 Dy No. 7339
 Date: 29-12-25

Chairman NEPRA

From: SHAHID KHAN <mshahidashrafk@gmail.com>
Sent: Tuesday, December 23, 2025 9:45 PM
To: Chairman@nepra.org.pk

Dear Sir
Have some mercy on Pakistani people...Why All the policies are anti public.
Govt should stick to it's promises made with Solar system holders.
We don't agree with your new one sided regulation which is intended to be enforced.
It's simply anti public and based upon irrational thinking.

~~Registrar~~

NEPRA
Licensing Department
Diary No. 2143
Date: 30-12-25

29/12

Forwarded please:

☒ For Decision ☐ For Information

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For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Adm. DG	Dir.	Adm. Dir.	DD-1
AD-1	AD-2	AD-3	ES
TA	AC/AS	AC/AS	CA-1

CHAIRMAN
By No. 7338
Date: 24-12-25

From: SNK khan <sajid1st1st@gmail.com>
Sent: Tuesday, December 23, 2025 9:38 PM
To: Chairman@nepra.org.pk
Subject: Net metering vs Gross metering

It is understood that the govt is considering the change in policy mainly to address the falling demand of grid power for which it is paying the IPPs ...despite that IPPs are not required to generate full capacity power.

The proposed policy will accelerate the shift to hybrid /gridless energy and thus further aggravate the situation.

Following is strongly proposed:-

- a. NO change in net metering policy or rates(export/import).
 - b. IPPs be required to generate FULL capacity electricity.
 - c. Power thus generated be provided to MANUFACTURING Sector at CHEAPER rates than Commercial. Best would be to provide it on the CHEAPEST rates ie even lower than the Residential rates. This will encourage purchase of electricity for manufacturing which will enhance exports and lead to progress.
- The govt will not have to FORCE purchase of elec units by Residential users to compensate for lack of demand. Public will feel good when IPPs will be paid for something they are PRODUCING rather than just getting money WITHOUT even producing elec.

No further renewals of contracts with IPPs should be allowed.

Regards
 Sajid N Khan
 Islamabad
 03350016767

Adm. DG	✓	Adm. Dir	ADG-I
ADG-II	✓	PS	PS
ADG-III	✓	ADG-III	ADG-III

[Handwritten signature]
 29/12

Registered

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For kind information, please.
 1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

CHAIRMAN
 Dy No. 7337
 Date: 24-12-25

15080
 06051
 29/12/25
 NEPRA
 License Department
 Diary No. 2/42
 Date: 30-12-25

Chairman NEPRA

From: Ikram Rasheed <ikram@mcgroup.com.pk>
Sent: Tuesday, December 23, 2025 9:29 PM
To: Chairman@nepra.org.pk
Cc: registrar@nepra.org.pk
Subject: Protest against implementing new policy of net billing wef 14th January 2026

Sir,
I have come to know about the new policy and I am deeply concerned that how can this government be so ruthless to finish solar net metering. People have put their savings in instalation of solar as they were previously encouraged to go on solar as government had itself given incentives. But now this is a U turn which will affect millions of households.

Nations who have progressed continue governing policies so common person should not effected due to change in leadership.
I am recording my protest to the above action.

Qudsia niazi .
House 01 Street 02 sector F DHA 2 near gate 4 Islamabad
email: ikram@mcgroup.com.pk
Mobile: 03331512260

Registrar
✓ 29/12

Forwarded please:
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For kind information, please.
☒ 1. Chairman ☒ 2. M (Tech)
☒ 3. M (Law) ☒ 4. M (Dev)

REGISTRAR GENERAL
NEPRA
Licensing Department
Dy No. 2101
Date: 30-12-25

Addl. DG	✓	Addl. Dir	DD-I
AD-I	RO	PS	ES
TA	OA-I	OA-II	OA-III

CHAIRMAN
Dy No. 7336
Date: 24-12-25

Chairman NEPRA

From: shahid ansar <shahid.ansar@gmail.com>
Sent: Wednesday, December 24, 2025 1:06 PM
To: cad@nepra.org.pk
Cc: registrar@nepra.org.pk; chairman@nepra.org.pk
Subject: Termination of Net Metering Policy

Dear sir,

This refers to news appearing in social media on replacement of Net Metering Policy by Net billing Policy.

I am very disappointed and strongly protest on termination of Net Metering Policy. I have invested based on Net Metering Policy as electricity rates are getting expensive and unaffordable. These type of decisions suggest that previous policy was not well thought and cast doubt on seriousness on part of the regulator.

Foregoing above, I strongly request to continue Net Metering Policy for old consumers and renew contract in future as well,

Regards

Syed Shahid Ansar

H 9, St 5, Sector A, DHA-, Islamabad

0300-8567616.

NEPRA
Billing Department
Diary No. 2140
Date: 24-12-25

Addl. DG	✓	Addl. Dir.	DD-I
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TA	QA-I	QA-II	QA-III

Registrar

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

CHAIRMAN
Dy No. 7354
Date: 24-12-25

Chairman NEPRA

From: khalid masood <khalidmasood73@yahoo.com>
Sent: Wednesday, December 24, 2025 12:10 PM
To: Chairman@nepra.org.pk
Subject: Net metering vs net billing policy

I consider net billing policy to be highly unjustified and irrational. It needs to be reviewed immediately Sent from my iPhone

NEPRA
Licensing Department
Diary No. 2139
Date: 20-12-25

Forwarded please:
☒ For nec. action ☐ For information

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For kind information, please.
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Addl DG	✓ Addl Dir	DD-I
AD-I	RO	PS
TA	POA-I	POA-II
		POA-III

CHAIRMAN
Dy No. 7355
Date: 24-12-25

From: shagufta baluch <shaguftabaluch@gmail.com>
Sent: Wednesday, December 24, 2025 7:34 AM
To: Chairman@nepra.org.pk

CHAIRMAN

Dy No. 7341

Date: 24-12-25

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 — Additional Adverse Impact on BTPL Consumers

Sir,

I submit my formal objections to the Draft NEPRA (Prosumer) Regulations, 2025, published via press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious and immediate financial loss to consumers who installed solar systems under an approved legal regime and with legitimate expectations of affordable electricity and regulatory certainty. Any reduction in the export value of self-generated electricity, adverse changes to settlement mechanisms, or retrospective application of new charges will deprive prosumers of the economic benefits that justified their investment and will defeat the very purpose of net-metering.

Breach of legitimate expectations and regulatory certainty

Many households and businesses invested in rooftop solar based on the existing legal and regulatory framework. Retrospective or punitive changes would amount to a breach of legitimate expectations, undermine the rule of law, and damage investor and consumer confidence in Pakistan's energy policy.

Conflict with national and international sustainability commitments

These proposed changes are inconsistent with Pakistan's stated climate and sustainability commitments, including obligations under the Paris Agreement and the United Nations Sustainable Development Goals, particularly those relating to affordable, reliable, and clean energy and climate action. Discouraging distributed renewable generation at this stage would set back national efforts to reduce emissions, improve energy security, and meet internationally-pledged targets.

Disproportionate burden on prosumers and BTPL consumers

As a consumer of BTPL, I am already adversely affected by:

- Arbitrary deduction/reduction of solar export units;
- Non-transparent charges imposed under the guise of tariff adjustments;
- "Misc. Charges" routinely added to electricity bills that do not appear in other DISCOs' billing.

Addl DG	✓	Addl Dir	S-DO-PK
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TA	QA	QA-II	QA-III

In this context, the draft regulations would further aggravate the financial exploitation of solar consumers by effectively using prosumers to offset DISCO inefficiencies, losses, theft, and non-recovery for which consumers are not responsible. This approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, consumer protection, and regulatory fairness.

Wider economic and system impacts

Discouraging rooftop solar will also harm broader public interests: it will slow job creation in the local solar industry, increase reliance on expensive centralized generation, raise overall system costs for

Licensing Department
Dy No. 2146
Date: 30-12-25

all consumers, and reduce the resilience and flexibility that distributed generation provides to the grid. It will also undermine efforts to diversify Pakistan's energy mix and to lower peak demand pressures on the transmission and distribution network.

Transparency, accountability and procedural fairness

The draft regulations, as currently framed, lack adequate safeguards to prevent misuse of prosumer revenues to cover unrelated DISCO liabilities. There is insufficient transparency around billing adjustments, export accounting, and the methodology for any new charges. There is also no clear, independent mechanism for auditing DISCO practices or for timely redress of consumer grievances.

Relief sought

In light of the foregoing, I respectfully request NEPRA to:

1. Reject any adverse or retrospective changes that would reduce the export value, alter settlement mechanisms, or otherwise penalize existing net-metering consumers who invested under the prior legal regime.
2. Grandfather existing prosumers under the rules and tariffs in place at the time of their interconnection, with any future changes applied only prospectively and after adequate notice and consultation.
3. Ensure prosumers are not used to subsidize DISCO losses, theft, or non-recovery. Any cost-recovery measures must be transparent, justified, and borne in a manner consistent with law and regulatory precedent.
4. Mandate transparent billing and independent audits of export accounting, meter readings, and any "miscellaneous" charges, with clear penalties for unlawful deductions or manipulations.
5. Require a public, evidence-based impact assessment and a meaningful stakeholder consultation process (including consumer groups, prosumer associations, industry representatives, and independent experts) before finalizing any changes.
6. Provide a clear grievance redressal and compensation mechanism for consumers who have suffered arbitrary deductions, illegal charges, or non-transparent billing practices, particularly BTPL consumers.
7. Align the final regulations with Pakistan's climate and energy commitments, ensuring they support, rather than hinder, the national transition to sustainable, distributed generation.

These measures will protect consumers, preserve regulatory credibility, support Pakistan's sustainability goals, and maintain a stable environment for continued private investment in clean energy.

I request that these objections be placed on record and given full and fair consideration before any finalization of the regulations. I am prepared to provide further evidence, billing examples, or testimony to support these objections if required.

Yours sincerely,
Shagufta Baluch
BTPL Consumer
Address: KDA.OVERSEAS BUNGALOWS
HOUSE K-14 BLOCK 16-A GULISTAN E JOHAR KARACHI

From: Muhammad Aslam <irfanaslam11402@gmail.com>
Sent: Wednesday, December 24, 2025 8:43 AM
To: Chairman@nepra.org.pk

Please act upon on the contract made with old Net Metering users and exempt from new net metering policy's.

Registrar

29/12

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUCM)

For kind information, please.

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

Addl DG	Addl DG	Dir. (I.T)
AD-I		E/S
CTA		TA-III

NEPRA
 Licensing Department
 Diary No. 2497
 Date: 24-12-25

SECRETARY GENERAL
 15085
 28/12/25

CHAIRMAN
 Dy No. 7342
 Date: 24-12-25

Chairman NEPRA

From: Razi Hasan <razi2gud@gmail.com>
Sent: Wednesday, December 24, 2025 8:55 AM
To: Chairman@nepra.org.pk
Subject: Reconsidering New Net Metering Policy

Dear sir

Please reconsider implementation of End of Net Metering policy as most of the people install solar after borrowing.

Implementing the new policy regarding Ending Net Metering shall certainly cause financial loss to common people which usually does not happen in welfare states.

So you are requested to avoid any such policy of ending Net Metering benefits

Regards

Registrar

29/12

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CRM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Addl. DG	Dir	Addl. Dir	DD-I
AD-I	RO	PS	E.S
TA	QA-I	QA-II	QA-III

CHAIRMAN
Dy No. 7343
Date: 24-12-25

Chairman NEPRA

From: Javed Aslam Tahir <javedatahir@gmail.com>
Sent: Wednesday, December 24, 2025 12:31 PM
To: Chairman@nepra.org.pk
Subject: Net Metering, New Rules By Nepra

The new policy regarding net metering by Nepra is absolutely unethical and goes against business norms.

It must continue, as well as buying and selling rates be the same, to encourage public to generate their own power. The power generated by Nepra be fully utilized by the industries at cheaper rates. Nepra must close all those IPPs which are expensive and not cost effective. Their capacity charges clauses must be deleted, as nowhere in the World such unethical clauses are added in the contract. All IPPs contracts were made against the National interest, to benefit individuals and investors. All those responsible to negotiate and sign such contracts must be brought to books.

I have been DGDP. We had made a comprehensive document for procurement/contracting, for the Government back in 2002-3. That must be consulted.

Thanks

Regards

Major General Javed Aslam Tahir, Retd

President Pakistan Exservicemen Society, PESS

24 December 25

NEPRA
Licensing Department
Diary No. 2138
Date: 30-12-25

Registrar

Forwarded please:
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For kind information, please,
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

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CA

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CHAIRMAN
Dy No. 7353
Date: 24-12-25

Chairman NEPRA

From: Javed Iqbal Malik <jimalik46@gmail.com>
Sent: Wednesday, December 24, 2025 1:25 PM
To: Chairman@nepra.org.pk
Cc: cad@nepra.org.pk; registrar@nepra.org.pk
Subject: New Net Metering and Billing Policy

Dear Sir,

It is being heard that NEPRA is ready to launch a new Net Billing Policy (end of Net Metering) with effect from 14 Jan 26. Reportedly, new policy will be applicable to both new and old licensees, except the purchase rate which will be Rs.27 for old users and Rs.11.5 for new users..

It is highly unjustified to first lure the citizens to install solar system, when people have installed these systems they are subjected to very harsh conditions. This unjustified policy is being launched, when entire world is encouraging the green energy and Pakistan is discouraging the same. It seems that this policy is being aiming at screwing the poor masses like fixed electricity/gas charges and petrol prices. You are requested to please review this policy and instead give relief to the people by lowering the

Electricity tariffs.

Best regards

Col Javed Iqbal (Retd)

Registrar

✓ 29/12

Forwarded please:

☒ For no action ☐ For information

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<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/ECM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Addl. DG	✓	Addl. Dir	DD-I
AD-I	RO	PS	E/S
STA	POA-I	OA-II	OA-III

CHAIRMAN
Dy No. 7352
Date: 24-12-25

From: Sajid Wazir <sajidwazirkhan@gmail.com>
Sent: Wednesday, December 24, 2025 11:54 AM
To: Chairman@nepra.org.pk

We don't support Net Billing Police

NEPRA
 Licensing Department
 Diary No. 2136
 Date: 30-12-25

Registrar

98015091
 29/12/25

✓ 29/12

Forwarded please:

☒ For sec. action ☐ For information

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<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIBCM)

For kind information, please.

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

Adm. DG	SA	Adm. Dir	Dir. HR
AD-1	RD	PS	E.S
TA-1	CA-1	CA-2	CA-3

CHAIRMAN
 Dy No. 7356
 Date: 24-12-25

From: Umar Sajjad <umar.sajjad8@gmail.com>
Sent: Wednesday, December 24, 2025 2:13 PM
To: registrar@nepra.org.pk; cad@nepra.org.pk; chairman@nepra.org.pk
Subject: Concern and Objection Regarding Proposed Net Billing Policy

Dear Sir,

I hope this email finds you well.

I am writing as a concerned citizen and a solar net-metering user to share my serious concerns regarding the Draft Prosumer Regulations 2025 and the proposed shift from Net Metering to the new Net Billing Policy, as advertised on 12 December 2025.

Like many others, I invested in a solar system after carefully considering the existing net-metering regulations and the assurances provided by the regulatory framework at that time. These systems require significant upfront investment, and the decision was made in good faith with the understanding that the rules would remain stable. Applying a new policy to existing users feels unfair and deeply discouraging.

My main concerns are:

1- Retrospective impact on existing users:

Changing the rules after people have already invested puts an unexpected financial burden on households and small businesses who were simply trying to reduce their electricity costs and support clean energy.

2-Very low buyback rates: The proposed rates, especially for new users, make solar generation economically unattractive and do not reflect the actual value that distributed solar brings to the grid.

3-Limited public consultation: Many affected users feel they did not get a meaningful opportunity to be heard before such a major change was proposed.

This policy, if implemented as proposed, risks slowing down solar adoption at a time when Pakistan needs affordable energy, energy independence, and environmental sustainability more than ever.

I sincerely request NEPRA to please reconsider this approach. At the very least, existing net-metering consumers should be fully protected and exempted from any new policy changes. A broader and more transparent consultation with stakeholders would also help build trust and lead to better outcomes for everyone.

Thank you for taking the time to read this email. I hope NEPRA will carefully consider the concerns of ordinary consumers before finalizing this policy.

Kind regards,
Sajjad Hussain

Addl. DG	✓	Addl. Dir.	DD-I
AD-I &	RO	PS	EIS
TA&S	POA-I	OA-II	OA-III

Forwarded please:

☒ For action ☐ For information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECOM)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

15097
28/12/25
Registrar
NEPRA
Licensing Department
Diary No. 2135
Date: 28.12.25

CHAIRMAN
Dy No. 7361
Date: 24-12-25

From: mazhar mahmood <mazharmahmood1949@gmail.com>
Sent: Tuesday, December 23, 2025 11:34 AM
To: registrar@nepra.org.pk
Subject: Re:

Addl. DG	Dir	Addl. Dir	DD-I
AD-I	RO	PS	E/S
TA	OA-I	OA-II	OA-III

On Tue, 23 Dec 2025 at 11:32, mazhar mahmood <mazharmahmood1949@gmail.com> wrote:

The Registrar
 (NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

[Handwritten signature]

Forwarded please:

☒ For nec. action ☐ For Information

<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information, please.

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

NEPRA
 Licensing Department
 Diary No. 2120
 Date: 29-12-25

14988
 24/12/25

7

Fouzia Mahmood
BTPL number 13354
House 230 Safari villa Bahria Town Lahore

From: Amjad Khattak <khattaksown@gmail.com>
Sent: Tuesday, December 23, 2025 10:52 AM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

Assalam o Alaikum

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing

practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
 Khattak

BTPL Consumer
 Bahria Hills View / Phase 7



Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EUCM)

For kind information, please.

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

1

Addl. DG	AD-I	TA	OA-I	Addl. Dir.	PS	OA-II	DD-I	E/S	OA-III
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NEPRA
 Licensing Department
 Diary No. 2123
 Date: 24-12-25

14994
 24/12/25

Registrar

From: IFTIKHAR AHMED <ifahmed60@hotmail.com>
Sent: Tuesday, December 23, 2025 11:04 AM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers.
Attachments: NEPRA solar objection.docx

Addl. DG	DR	Addl. Dir	DD-I
AD-I	RO	PS	E/S
TA	OA-I	OA-II	OA-III

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTBCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dov)

The Registrar

(NEPRA)

Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

- Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and
- "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.
- In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.
- Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

¹
[Signature]

NEPRA
Licensing Department
Diary No. 2125
Date: 29-12-25

[Handwritten signature]
14995
5864

I respectfully request NEPRA to:

- Reject any adverse or retrospective changes affecting existing net-metering consumers;
- Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
- Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

IFTIKHAR AHMED

BTPL Consumer # 01060221001903900

H NO 1620, ST: 9, Overseas Sector 5,

Phase 8, Bahria Town

Rawalpindi.

From: Nasrullah Khan <g.n.khan56@gmail.com>
Sent: Tuesday, December 23, 2025 12:30 PM
To: registrar@nepra.org.pk
Subject: Comments Net Metering Proposal

Addl. DG	Dir	Addl. Dir	DD-I
* AD-I *	* R-I *	* PS *	* PS *
* TA *	* OA-I *	* OA-II *	* OA-III *

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Nasrullah Khan
Consumer
House 4 Street 2C
Sector B DHAI - 1

Forwarded please:

☒ For nec. action ☐ For Information

<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ETECOM)

For kind information, please.

4. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Licensing Department
 Entry No. 2126
 Date 29-12-25

1999
201/2920

From: Shahid Paracha <s.l.paracha@gmail.com>
Sent: Tuesday, December 23, 2025 1:18 PM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

Proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Fahad Latif Paracha

House #249 F Circular Avenue 2 Safari Valley Usman D block Bahria Town Ph.8 Rawalpindi

Adl. DG	✓	Adl. Dir	DD-I
AD-I	RO	PS	E/S
CA	CA	CA	CA

NEPRA
Licensing Department
Diary No. 2120
Date: 23-12-25

Forwarded please:

☒ For nec. action

☐ For information

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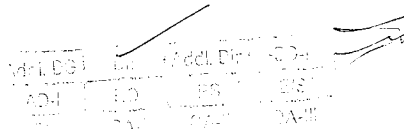
For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

15007
24/12/25

From: Sarmad Alvi <sarmadalvi@gmail.com>
Sent: Tuesday, December 23, 2025 1:57 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
NEPRA
Islamabad



Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

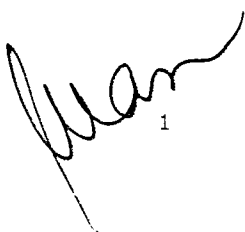
Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Sarmad Alvi


1

Forwarded please:	
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<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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For kind information, please,
Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA

Licensing Department

Diary No. 2119

Date: 29.12.25

15202
29/12/25

H No. 741, St 31, Phase 3, Bahria Town, Islamabad

Warm regards

Sarmad Alvi

From: Zeshan Ansari <zeshan@ayenbee.com>
Sent: Tuesday, December 23, 2025 2:37 PM
To: registrar@nepra.org.pk
Cc: brace@gmail.com
Subject: Objections to Draft NEPA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

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I respectfully request NEPA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Muhammad Zeshan Ansari

[Kwick Pay Reference No 01060221001767900

Consumer Name and Address :

Muhammad Zeshan Ansari

89-B Street 29 Overseas 1, Phase 8 Bahria Town Rawalpindi

MAIL DGT	DR	ADL DGT	ADL
201	20	201	20
201	20	201	20

[Signature]

Forwarded please:	
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input checked="" type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CI/COM)

For kind information, please,
 1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

NEPA
 Licensing Department
 Diry No. 2118
 Date: 24-12-25
 15015
[Signature]

From: Munir Qureshi <bilhaq60@gmail.com>
Sent: Tuesday, December 23, 2025 2:33 PM
To: registrar@nepra.org.pk

The Registrar
 (NEPRA)
 Islamabad
 Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:
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 Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Effect any adverse or retrospective changes affecting existing net-metering consumers;
 Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
 Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
 Mrs. Asiya Munir
 H. No. 280, Street No 15
 Garden City Zone-1
 Bahria Town
 Rawalpindi

Adm. DG: DG Adm. Dir: ED-1
 AD-1 RO AD-2 ES
 TA OAH CAH QA-III

Forwarded please:
☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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For kind information, please.
 1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

NEPRA
 Licensing Department
 Diary No. 2117
 Date: 29-12-25
 152/6
 24/12/25

From: Sanadeed Akram <sanadeedakram@hotmail.com>
Sent: Tuesday, December 23, 2025 12:04 PM
To: registrar@nepra.org.pk
Subject: AVOID ANY REDUCE SOLAR UNIT CHARGES

We are hearing about the new policy for net metering from the government, in which we are not aware of the rest of the issues, but the unit charges that are being reduced are very worrying. Kevin's consumer has his own investment, instead of appreciating it, the government is going to reduce the unit charges to cover its wrong policies. The government should understand that the people did not make deals with IPPs, the government did this on its own initiative. Therefore, if you cannot provide the facility to the people, and the people are doing this facility on their own, then instead of supporting it, the government should not force the people to buy electricity from the government at high prices by making amendments and changes. The government's forcibly fixing its rates on the people, and forcing them to buy electricity from the government without any reason is a very wrong act. In this context, there is concern about the reduction of the unit rate from the amendments made. It should be kept active in the old way.

Sent from Outlook for Android

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Forwarded please:

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For kind information, please.

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3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2137
Date: 20/12/25

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15007
09/12/26

Chairman NEPRA

From: secretary.general@kati.pk
Sent: Monday, December 22, 2025 11:34 AM
To: chairman@nepra.org.pk
Cc: president@kati.pk; osman.maftun@kati.pk; 'Rehan Jawed'
Subject: Humble request for notification of a clear cut-off date for net billing, for pending net metering applications with DISCOs

Respected Sir

On behalf of the **Korangi Association of Trade and Industry (KATI)**, we respectfully submit this request for NEPRA's kind consideration regarding the transition from the net metering framework to the net billing regime. This issue is being repeatedly raised by both residential consumers and industrial members, particularly those whose applications are currently pending at different stages of processing.

We understand that under the revised framework, existing net metering licence holders will continue to receive compensation for electricity exported to the grid at the national average power purchase price until the expiry of their licences, while new licence holders will be compensated at an energy-only rate. While we respect NEPRA's policy direction, we humbly submit that **the absence of a clearly notified cut-off date has created uncertainty for consumers who have already installed solar systems and submitted applications in good faith.**

It is important to highlight that **a large number of net metering applications are presently pending with DISCOs and K-Electric and, in many cases, have not yet been forwarded to NEPRA for further processing.** In practice, applications are only submitted after the installation of the system in accordance with prescribed technical standards. As a result, consumers have already incurred capital costs based on the regulatory framework prevailing at the time of installation. Delays in inspection, verification, and onward forwarding of applications are administrative in nature and are beyond the control of consumers.

In all fairness, consumers who have completed installations and submitted applications within time should not be disadvantaged due to procedural delays at the utility level. A clearly notified cut-off date will help ensure uniform treatment, avoid confusion across DISCOs, and provide consumers with clarity to make informed decisions regarding continuation under the new framework or modification of their system design, such as shifting to hybrid or storage-based solutions.

In view of the above, **we humbly request NEPRA to kindly notify a clear-cut-off date, and allow all applications submitted and pending with DISCOs or K-Electric up to that date, including those not yet forwarded to NEPRA, to be accommodated under the net billing framework with compensation at the national average power purchase price.** This will help ensure that consumers are treated fairly and consistently.

We believe that such clarification will significantly reduce grievances, maintain consumer confidence, and support a smooth and orderly transition to the revised framework. KATI and its members remain fully supportive of NEPRA's efforts to strengthen the power sector and submit this request in a spirit of cooperation and constructive engagement.

We respectfully request your kind consideration of this matter.

Yours sincerely,

Secretary General
Korangi Association of Trade and Industry (KATI)

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From: Chairman NEPRA <chairman@nepra.org.pk>
Sent: Tuesday, December 23, 2025 2:17 PM
To: Registrar
Subject: FW:

Adm. DG ✓ Adm. Dir. ✓
Asst. Dir. ✓
TA ✓ OA ✓ CA ✓ OA-III ✓

Dear Sir,

For circulation please.

Regards,

PA to Chairman

From: ali khan <ali.gauher@gmail.com>
Sent: Tuesday, December 23, 2025 11:32 AM
To: regesterar@nepra.org; chairman@nepra.org.pk
Subject:

To: The Regesterar (NEPRA) Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

Unfairly the electricity produced by the IPPs is bought at more than triple the rate of poor consumers producing 100% clean energy from their households premises.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[A G khan]

[BTPL Consumer /
[Address / Phase – 3 , Rd. D H. 693 ,Bahria Islamabad
03339009006

Registrar

From: Omar Zafar <rajaomar@gmail.com>
Sent: Tuesday, December 23, 2025 2:36 PM
To: registrar@nepra.org.pk
Subject: Objections to the draft NEPRA regulations change

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL (bahria town rawalpindi) Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

Respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers.

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Omar Zafar

BTPL Consumer
(H No 54 St 2 Zone 1 Garden City Bahria Phase 7 Rawalpindi)

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (GTBCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2488
Date: 29.12.25

Registrar

From: Hamid Zahidi <hamid_zahidi@hotmail.com>
Sent: Tuesday, December 23, 2025 3:01 PM
To: registrar@nepra.org.pk
Subject: Objection to Draft NEPRA Regulations, 2025 - Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Nuzhat Zahidi
H.N. 354, Street 21
Garden City, Zone 1
Bahria Town, Phase 7
Rawalpindi/Islamabad
Sent from my iPhone

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/RCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Addl. DG	Dir.	Addl. Dir.	DD-I
ADH	RO	S	E.S.
QA-I	QA-II	QA-III	QA-IV

NEPRA
Licensing Department
Dir. No. 2487
Date: 29-12-25

15/11/2025
24/12/25

Registrar

From: Qazi Shahid <kazee91@gmail.com>
Sent: Tuesday, December 23, 2025 12:37 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPA)
Islamabad

Sir,

I submit my objections to the Draft NEPA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Qazi Shahid Samad,
CNIC: 54400-0557017-9

Consumer No. 15146212317600
House No SD-58 Lane-2 Askari-13, Lalazar, Rawalpindi

Adm. DG: Dir. Adm. DG: DD-1
AD-1 AD-2 AD-3 AD-4
CA-1 CA-2 CA-3 CA-4

Forwarded please:

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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ICRM)

For kind information, please.

1- Chairman 2- M (Tech)
3- M (Law) 4- M (Dev)

NEPA
Licensing Department
Diary No. 2186
Date: 29-12-25

15010
29/12/25

Registrar

From: kamran adil <adilkamranamc@yahoo.com>
Sent: Tuesday, December 23, 2025 2:23 PM
To: registrar@nepra.org.pk
Subject: Net metering new proposed regimen

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Kamran Adil

Resident of
Overseas Sector 6, Phase 8, Bahria Town Rawalpindi

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Forwarded please:

☒ For nec. action ☐ For Information

<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Reg No. 2/55
Date: 29-12-25

15017
26/12/25

Yahoo Mail: Search, Organize, Conquer

Registrar

From: Azhar mahmood <azharbahria08@gmail.com>
Sent: Tuesday, December 23, 2025 2:53 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Azhar Mahmood

House 08, street 02, khalid Extension Block/ phase VIII, Rawalpindi

Forwarded please:

☒ For nec. action ☐ For Information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (crim.)

For kind information, please.

1. Chairman 2. M (Tech)

3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2148
Date: 20-12-25

Azhar

15093
24/12/25

Registrar

From: Matloob H. Raja <matloobhreja@gmail.com>
Sent: Tuesday, December 23, 2025 2:19 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Sir,

Adm. DG	Dir.	Adm. DG	Dir.
Adm. DG	Dir.	Adm. DG	Dir.
Adm. DG	Dir.	Adm. DG	Dir.
Adm. DG	Dir.	Adm. DG	Dir.

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Matloob H Raja

[BTPL Consumer /
House No. 39. Street 2 Sector A
Phase 8. Rawalpindi

Matloob H Raja

Forwarded please:

☒ For reg. action ☐ For Information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CICOM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2149
Date: 29-12-25

15014
24/12/25

Registrar

From: Hanif Aurakzai <hanif.aurakzai@gmail.com>
Sent: Tuesday, December 23, 2025 1:13 PM
To: registrar@nepra.org.pk
Cc: Hanif Aurakzai
Subject: Subject: Objections to Draft NEPRA(Prosumer) Regulations, 2025 - Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by: Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan. In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible. Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:
Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[Muhammad Hanif Aurakzai]

House -854, Street -2, Sector -"C", Phase-8, Bahria Town Rawalpindi/Islamabad.
23 December, 2025.

Adm. DG	Dir.	Adm. Dir.	TD-I
AD-I	RO	PS	E/S
QA-I	QA-II	QA-III	QA-IV

Forwarded please:

☒ For nec. action ☐ For Information

<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/BCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Secretary
May New 2150
Date 20-12-25

18006
24/12/25

Registrar

From: Irfan Farooq <irfan.farooq12@gmail.com>
Sent: Tuesday, December 23, 2025 11:22 AM
To: registrar@nepra.org.pk
Subject: Objection to draft producer regulations 2025

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

The proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Dr. Irfan Farooq
Dha 2
Islamabad
0331 9838469

Forwarded please:

☒ For nec. action ☐ For Information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (T.H.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C.I.U.M)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

1

Addl. DG	RO	Addl. Dir	DD-I
AD-I	PS	PS	ES
TA	POA-I	OA-II	OA-III

NEPRA
Licensing Department
Diary No. 2119
Date: 29-12-25

14988
24/12/25



Registrar

From: Dr. Shuaib Khan <shuaibkhan321@yahoo.com>
Sent: Tuesday, December 23, 2025 11:05 AM
To: registrar@nepra.org.pk
Subject: Objections on Draft regulations 2025

Addl. DG	✓	Addl. Dir	DD-I
AD-I	✓	RO	PS
TA	✓	OA-I	OA-II
		OA-III	E/S

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Dr. Shuaib Khan
BHV Phase 7 Bahria Town Islamabad

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CT/COM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2118
Date: 29-12-25

14280
24/12/25

From: M Shajeeh Mustafa <mshajeehm@gmail.com>
Sent: Tuesday, December 23, 2025 2:11 PM
To: registrar@nepra.org.pk

السلام عليكم

Adm. DG: [] Dir: [] Adm. Dir: [] DG-4
 AD-1: [] RD: [] PS: [] ES: []
 CA: [] CA-1: [] CA-2: [] CA-3: []

The Registrar
 (NEPRA)
 Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

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In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

- Reject any adverse or retrospective changes affecting existing net-metering consumers;
- Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
- Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

15018
 24/12/25
 NEPRA
 Licensing Department
 Diary No. 115
 Date: 24-12-25

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For Information
<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/RCM)

For kind information, please.

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

8

These objections may kindly be placed on record and duly considered before finalization of the regulations

Kind Regards

Muhammad Shajeeh Mustafa
Bahria Town Phase 8, Rawalpindi

U

U

Registrar

From: mazhar mahmood <mazharmahmood1949@gmail.com>
Sent: Tuesday, December 23, 2025 10:53 AM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

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In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

Respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Mazhar Mahmood

[BTPL Consumer meter number 40014297

House 46, Street 4, phase 6

Bahria Town Rawalpindi

Addl. DG	Dir.	Addl. Dir.	DD-I
AD-I	RO	PS	E/S
TA	QA-I	QA-II	QA-III

Mazhar

1

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (AIC)
<input type="checkbox"/> ADG (Tr.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (ECON)

For kind information, please,

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2116
Date: 29-12-25

148983
24/12/25

Registrar

From: mazhar mahmood <mazharmahmood1949@gmail.com>
Sent: Tuesday, December 23, 2025 11:33 AM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

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Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Fouzia Mahmood

BTPL number 13354

House 230 Safari villa Bahria Town Lahore

Addl. DG	Dir.	Addl. Dir.	DD-1
AD-1	RO	PS	ES
TA	QA-1	QA-2	QA-3

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (IT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/REG)

For kind information, please.

✓ Chairman 2. M (Tech)
✓ 3. M (Law) 4. M (Dev)

NEPRA
Licensing Department
Diary No. 2117
Date: 29-12-25

14992
24/12/25

Registrar

From: Ashraf Niazi <ashraf.niazi@yahoo.com>
Sent: Tuesday, December 23, 2025 2:04 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

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These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

[BTPL Consumer /
Muhammad Ashraf
H-2034 ST-66 Abubakar Block phase8
Bahria Town Rawalpindi

MAILED 23 DEC 2025
ADJ. TO REG. GEN. SEC.
REG. GEN. SEC.

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input checked="" type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (C/ECM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

1

15019
81054
24/12/25

Registrar

From: BADER Awan <baderzmawan@gmail.com>
Sent: Tuesday, December 23, 2025 12:42 AM
To: registrar@nepra.org.pk
Subject: Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad.

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

Proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Bader Zaman Malik
Bahria Town, phase 8, sector H

Forwarded please:

☒ For nec. action ☐ For information

<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (L.I)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consultant (CIB/M)

For kind information, please.

1. Chairman ☒ M (Tech)
2. M (Law) ☒ 4. M (Dev)

Registrar

From: Mubasher Butt <mubasherbutt@hotmail.com>
Sent: Tuesday, December 23, 2025 6:00 AM
To: registrar@nepra.org.pk
Subject: Objection to Proposed Amendment to Solar Policy

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Mubasher Butt

H No 155, Street 5, Phase 4
Bahria Town, Islamabad

Forwarded please:

☒ For nrc-action ☐ For information

<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trt.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SCA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTBCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

3

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Registrar

From: Adnan Zubairy <mazubairy@gmail.com>
Sent: Monday, December 22, 2025 11:53 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

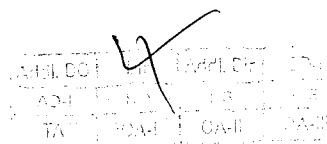
I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Adnan Zubairy

BTPL Consumer



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Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For Information
<input type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trd.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CUCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

6

443-B, Street 9-A, Phase 3
Bahria Town Islamabad

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Registrar

Subject:

FW: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

-----Original Message-----

From: Malik Usman Gul <malik_gul87@msn.com>

Sent: Monday, December 22, 2025 11:40 PM

To: registrar@nepra.org.pk

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)

Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

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Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory clarity, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

[Name]

[BTPL Consumer /
[Address / Phase –

Forwarded please:

<input checked="" type="checkbox"/> For nec. action	<input type="checkbox"/> For Information
<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech.)	<input type="checkbox"/> DG (ATC)
<input type="checkbox"/> ADG (Trf.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E&C/M)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Faisal Bhatti <faisalrizwan832@gmail.com>
Sent: Monday, December 22, 2025 10:52 PM
To: registrar@nepra.org.pk

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

Proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering. As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
[Name]

[BTPL Consumer Faisal Rizwan]

[Address / Phase –H no 988 main boulevard sector H phase 8]

1

Forwarded please:

☒ For Rec. action ☐ For Information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CICOM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Hafiz Muhammad Mehran Tariq <hmehran99@gmail.com>
Sent: Monday, December 22, 2025 10:48 PM
To: registrar@nepra.org.pk
Subject: Request for Reconsideration of Prosumer Act 2025 & Retention of Net Metering

RECEIVED
DIRECTOR GENERAL OFFICE
Dated: 23.12.25
Entry No: 14963

Respected Registrar,
National Electric Power Regulatory Authority (NEPRA),

I hope this email finds you in good health and high spirit of public service.

I am writing this message as a concerned citizen of Pakistan and a responsible energy prosumer who invested in rooftop solar under the Net Metering Policy with trust in the regulatory vision of NEPRA. With utmost respect, I wish to express my deep concern over the recently proposed changes under the Prosumer Act 2025 and the transition towards Net Billing, which, if implemented in their current form, may unintentionally discourage clean energy adoption across the country.

Net Metering was not merely a financial mechanism; it was a promise. A promise that encouraged middle-class households, small businesses, farmers, and industries to contribute towards Pakistan's energy independence, reduce load on the national grid, and actively participate in climate resilience. Thousands of families made long-term financial decisions based on this policy, believing in its continuity and fairness.

The proposed Net Billing structure significantly alters this balance. Lower buy-back rates, policy uncertainty, and reduced returns risk undermining investor confidence, not only in solar energy but in Pakistan's regulatory consistency as a whole. For many prosumers, this change transforms solar from a sustainable solution into a financial burden — something that defeats the very purpose of renewable transition.

At a time when Pakistan is battling inflation, energy shortages, circular debt, and climate challenges, discouraging decentralized renewable generation may have far-reaching consequences. Rooftop solar has proven to:

- Reduce peak load stress
- Save foreign exchange spent on fuel imports
- Empower citizens to be part of the solution
- Create local employment and technical growth

RECEIVED
DIRECTOR GENERAL OFFICE
Dated: 23.12.25
Entry No: 14963

Rolling back or weakening Net Metering risks slowing this progress.

With humility, I request NEPRA to kindly reconsider the Prosumer Act 2025 in its current form and **retain the Net Metering Policy as it is**, or at the very least, protect existing and future prosumers with a fair, predictable, and sustainable framework. Policies that reward contribution rather than penalize participation will ensure long-term prosperity for both the people and the power sector of Pakistan.

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EUCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

6

This request is not made in opposition, but in hope — hope that NEPRA will continue to stand as a guardian of public interest, clean energy growth, and national progress.

Thank you for your time, consideration, and continued service to Pakistan.

Yours sincerely,

Hafiz M. Mehran Tariq

Concerned Citizen & Energy Prosumer

Registrar

From: Faheem Dar <faheemdar55@gmail.com>
Sent: Monday, December 22, 2025 10:39 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Dear Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

A consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, illegal charges imposed under the guise of tariff adjustments, and

"Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;
Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and
Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Faheem Ahmad Dar

[BTPL Consumer

House 167, Street 27, Sector H, Bahria Town Phase 8, Rawalpindi

REGISTRAR OFFICE
Jany No. 14964
Date: 23.12.25

Forwarded please:

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<input type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EBCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Abdul Quddus Abbasi <aquddus.abbasi@gmail.com>
Sent: Monday, December 22, 2025 10:07 PM
To: registrar@nepra.org.pk
Subject: Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad
Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of Bahria Town (BTPL) Rawalpindi, I am already adversely affected by:

Arbitrary deduction/reduction of solar export units,

Illegal charges imposed under the guise of tariff adjustments, and

"Miscellaneous Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses; and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

The objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,

Abdul Quddus Abbasi

BTPL Consumer

House 157, street 19, Safari Villas-1, Bahria Town Rawalpindi.

Forwarded please:

☒ For reg. action ☐ For Information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input checked="" type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CTUGM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

ADG DG 10/12/25
ADG 10/12/25
TA 10/12/25

From: Muhammad Asim <asim@aaexchange.com.pk>
Sent: Tuesday, December 23, 2025 10:06 AM
To: registrar@nepra.org.pk
Cc: info@nepra.org.pk; hello@callmeasim.com
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Impact on Public & Private Stakeholders

Dear Sir/Madam,

I am writing to formally submit my objections and concerns regarding the recently published **Draft NEPRA (Prosumer) Regulations, 2025**. While I understand the Authority's goal to ensure grid stability and financial viability for DISCOs, the proposed shift from Net Metering to Gross Metering (Net Billing) presents significant drawbacks for both the public and private sectors in Pakistan.

1. Drawbacks for the Public Sector & National Economy

- Contradiction of Climate Goals:** The drastic reduction of buyback rates (from ~Rs. 26 to ~Rs. 13) and the 5-year contract limit will significantly slow down solar adoption. This contradicts Pakistan's **Indicative Generation Capacity Expansion Plan (IGCEP)** and international commitments to reach 60% renewable energy by 2030.
- Increased Circular Debt:** By discouraging private investment in solar, the government will remain forced to rely on expensive, imported fossil fuels and pay heavy **capacity payments** to IPPs. Private solar investment is a "zero-cost" generation for the state; suppressing it will increase the long-term cost of electricity for all.
- Foreign Exchange Pressure:** Every unit generated by a prosumer saves foreign exchange otherwise spent on coal or LNG. A slowdown in solar will lead to a higher import bill for fuel.

2. Drawbacks for the Private Sector & Domestic Consumers

- Economic Unviability (ROI):** The proposed buyback rate of **Rs. 11.30 – 13.00** per unit against an import cost of **Rs. 50+** per unit makes the payback period jump from 3 years to over 7–8 years. This makes solar financially inaccessible for the middle class and small businesses.
- Arbitrary Capacity Limits:** Reducing the allowed solar capacity to **100% of sanctioned load** (down from 150%) ignores the reality that solar generation is only available for a few hours a day. This restriction prevents consumers from achieving true "net-zero" energy bills.
- Industry Job Losses:** Pakistan's solar industry has grown into a billion-dollar sector employing thousands. These regulations threaten to collapse hundreds of solar SMEs (Small & Medium Enterprises) as demand for new installations is already plummeting due to policy uncertainty.

3. Conclusion and Recommendations

The proposed regulations place the burden of "capacity payments" and "DISCO inefficiencies" onto the only segment of society that has invested its own capital to solve the energy crisis. I urge the Authority to:

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (R.T)
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For kind information, please:
1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

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1. **Maintain the 1-for-1 Net Metering** until the grid reaches a pre-defined saturation point (e.g., 20% of total mix).
2. **Restore the 7-year contract term** to provide investment security.
3. **Encourage Battery Storage** through subsidies or duty waivers rather than penalizing grid exports.

I request that these objections be made part of the official record and that a public hearing be held where stakeholders can present these concerns in person.

Sincerely,

Muhammad Asim

Advisor

Registrar

From: Brig Iftikhar Opel, SI (M), Retd - SG FPCCI <iftikhar.opel@fpcci.org.pk>
Sent: Monday, December 22, 2025 11:14 AM
To: registrar@nepra.org.pk; office@nepra.org.pk
Cc: awaisleghari@hotmail.com; rehanjawed01@hotmail.com
Subject: Request for notification of cut-off date and protection of compensation mechanism for net metering applications filed prior to such date
Attachments: Letter to Registrar NEPRA - 22-12-2025.pdf

FPCCI-NEPRA/2025
22nd December 2025

The Registrar,
National Electric Power Regulatory Authority (NEPRA),
Islamabad

Subject: Request for notification of cut-off date and protection of compensation mechanism for net metering applications filed prior to such date

Dear Sir,

At the outset, FPCCI respectfully submits that a large number of residential and industrial consumers have already installed net metering systems and filed their applications with DISCOs or K-Electric strictly in accordance with the regulatory framework prevailing at the time of investment. These applications, whether processed or still under administrative review, were submitted in good faith based on the then-applicable export compensation at the national average power purchase price. The notification of the net billing framework, in the absence of a clearly defined cut-off date, has created confusion and uncertainty regarding the treatment of such applications.

In all fairness and in accordance with the principles of natural justice, we respectfully request NEPRA to notify a clear and objectively verifiable cut-off date linked to the date of application submission. Further, FPCCI submits that all applications filed up to such notified cut-off date must be compensated for exported energy at the national average power purchase price, irrespective of whether they are processed before or after the announcement of the cut-off date. Until such cut-off date is formally notified, all net metering applications being filed and processed must continue to be treated under the existing compensation mechanism at the national average power purchase price. This

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (at HCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

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23-12-25

approach ensures regulatory certainty, prevents retrospective application of policy changes, and guarantees uniform implementation across all DISCOs and K-Electric.

FPCCI respectfully request NEPRA's kind consideration and early issuance of an appropriate clarification or directive. **We will continue to highlight and submit further issues, if pointed out by the business community, to support a fair and orderly implementation of the regulatory framework.**

Best Regards,
Brig Iftikhar Opel, SI (M), Retd
Secretary General



Address: Federation House, Abdullah Shah Ghazi Road,
Main Clifton, Karachi, Pakistan.

Tel: +92 21 35873691 – 94 Ext: 205

Cell: +92 321-8201428

Email: iftikhar.opel@fpcci.org.pk URL: www.fpcci.org.pk

Copy to : - Honourable Minister for Energy (Power Division), Government of Pakistan
- The Secretary, Ministry of Energy (Power Division), Government of Pakistan

Registrar

From: secretary.general@kati.pk
Sent: Monday, December 22, 2025 11:35 AM
To: registrar@nepra.org.pk
Cc: president@kati.pk; osman.maftun@kati.pk; 'Rehan Jawed'
Subject: Humble request for notification of a clear cut-off date for net billing, for pending net metering applications with DISCOs

Respected Sir

On behalf of the **Korangi Association of Trade and Industry (KATI)**, we respectfully submit this request for NEPRA's kind consideration regarding the transition from the net metering framework to the net billing regime. This issue is being repeatedly raised by both residential consumers and industrial members, particularly those whose applications are currently pending at different stages of processing.

We understand that under the revised framework, existing net metering licence holders will continue to receive compensation for electricity exported to the grid at the national average power purchase price until the expiry of their licences, while new licence holders will be compensated at an energy-only rate. While we respect NEPRA's policy direction, we humbly submit that **the absence of a clearly notified cut-off date has created uncertainty for consumers who have already installed solar systems and submitted applications in good faith.**

It is important to highlight that a large number of net metering applications are presently pending with DISCOs and K-Electric and, in many cases, have not yet been forwarded to NEPRA for further processing. In practice, applications are only submitted after the installation of the system in accordance with prescribed technical standards. As a result, consumers have already incurred capital costs based on the regulatory framework prevailing at the time of installation. Delays in inspection, verification, and onward forwarding of applications are administrative in nature and are beyond the control of consumers.

In all fairness, consumers who have completed installations and submitted applications within time should not be disadvantaged due to procedural delays at the utility level. A clearly notified cut-off date will help ensure uniform treatment, avoid confusion across DISCOs, and provide consumers with clarity to make informed decisions regarding continuation under the new framework or modification of their system design, such as shifting to hybrid or storage-based solutions.

In view of the above, we humbly request NEPRA to kindly notify a clear-cut-off date, and allow all applications submitted and pending with DISCOs or K-Electric up to that date, including those not yet forwarded to NEPRA, to be accommodated under the net billing framework with compensation at the national average power purchase price. This will help ensure that consumers are treated fairly and consistently.

We believe that such clarification will significantly reduce grievances, maintain consumer confidence, and support a smooth and orderly transition to the revised framework. KATI and its members remain fully supportive of NEPRA's efforts to strengthen the power sector and submit this request in a spirit of cooperation and constructive engagement.

We respectfully request your kind consideration of this matter.

Yours sincerely,

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> DG (S/D)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/E/M)

For kind information, please.

1. Chairman	2. M (Tech)
3. M (Law)	4. M (Dev)

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		CA-III

149822
25-12-25

Registrar

From: Adnan Zubairy <mazubairy@gmail.com>
Sent: Monday, December 22, 2025 11:53 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

The proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and

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In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers;

Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and

Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
Adnan Zubairy

BTPL Consumer

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<input checked="" type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Admin)

For kind information, please,

1. Chairman * 2. M (Tech)
3. M (Law) 4. M (Dev)

14928
23-12-25

Registrar

From: Khawaja Kamran <khawajakamran294@gmail.com>
Sent: Monday, December 22, 2025 4:06 AM
To: registrar@nepra.org.pk
Subject: Concern and Request for Retention of Net Metering Policy

Respected Sir,

I respectfully request that the current net metering policy should be continued without any changes, as it has become a necessity for consumers.

Installing a solar system involved many challenges, including high costs, approvals, and delays. After bearing all these difficulties and making a long-term investment, any change in the policy at this point will place an unfair burden on customers.

Net metering supports renewable energy, helps reduce pressure on the national grid, and benefits both consumers and the country. I sincerely urge you to maintain the existing policy to protect the interests of solar users.

Thank you.

Forwarded please:

☒ For noc. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic)	<input type="checkbox"/> DG (Admin/HR)
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<input type="checkbox"/> ADG (TR)	<input type="checkbox"/> DG (Fin)
<input type="checkbox"/> S.A.	<input type="checkbox"/> DG (IT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (HRM)

For kind information please,

☒ Chairman ☒ Tech
☒ S.M (Law) ☒ S.M (Dev)

Registrar

From: Khawaja Abdullah <khawajaabdullah2010@gmail.com>
Sent: Monday, December 22, 2025 4:10 AM
To: registrar@nepra.org.pk
Subject: Concern and Request for Retention of Net Metering Policy

Respect Sir

I have installed an industrial unit in Pakistan and am currently facing very high electricity bills. To continue operating my industry and manage energy costs, I am now in the process of installing a solar power system.

At this stage, changing the net metering policy will create serious problems for my business. If this policy is changed in the future, my industry will not be able to sustain operations and may be forced to shut down. This will not only affect my business and workers but will also negatively impact Pakistan's economy.

Net metering provides essential support to industries that are trying to remain operational while contributing to clean and sustainable energy. I respectfully request that the existing net metering policy be continued to protect industries and economic stability.

Yours sincerely,

A Concerned Consumer

Forwarded please:

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<input type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
<input type="checkbox"/> DG (Tech)	<input type="checkbox"/> DG (AEC)
<input type="checkbox"/> ADG (T+I)	<input type="checkbox"/> DG (Fin)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> DG (IT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consultant (HR)

For kind information, please.

✓ 1. Chairman 2. M (Tech)
✓ 3. M (Law) 4. M (Dev)

Registrar

From: Pak China Solar Energy <pakchinasolarenergy@gmail.com>
Sent: Monday, December 22, 2025 4:13 AM
To: registrar@nepra.org.pk
Subject: Request to Continue Existing Net Metering Policy

Respected Sir,

I am Khawaja Kamran, owner of Pak China Solar Energy. I respectfully request NEPRA to continue the existing net metering policy, as it is vital for the growth of the solar industry, consumers, and Pakistan's economy.

The current net metering policy has encouraged investment in renewable energy and helped residential, commercial, and industrial consumers manage rising electricity costs. Any sudden change in this policy will negatively impact the solar sector, reduce consumer confidence, and affect businesses and employment opportunities linked to this industry.

As a solar energy service provider, I have observed the significant challenges faced by customers, including high installation costs and lengthy approval procedures. Policy uncertainty at this stage will discourage the adoption of clean energy and slow down Pakistan's progress toward energy sustainability.

I sincerely urge NEPRA to maintain the existing net metering policy in order to protect investments, support the solar industry, and ensure economic stability.

Thank you for your time and consideration.

Yours sincerely,

Khawaja Kamran

Pak China Solar Energy

Forwarded please:

☒ For nec. action ☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
<input checked="" type="checkbox"/> SA (M&E)	<input type="checkbox"/> DG (CAD)
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<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (Admin)

For kind information, please:

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

14978
23-12-25

Registrar

From: Khawaja Kamran <khawajakamran987654321@gmail.com>
Sent: Monday, December 22, 2025 4:04 AM
To: registrar@nepra.org.pk
Subject: Request to Continue Existing Net Metering Policy

Respected Sir,

I humbly request that the existing net metering policy may please be continued, as it has become an essential requirement for consumers.

I went through many difficulties to install a solar system, including significant financial burden and lengthy procedures. After making this investment, any change in the policy at this stage will cause serious hardship and financial loss to customers like me.

Net metering plays an important role in promoting renewable energy and reducing pressure on the national power grid. I sincerely request that the current policy should remain unchanged in the interest of existing and future consumers.

Thank you for your consideration.

Forwarded please:

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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. R.T.
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (ECOM)

For kind information, please:

✓ 1. Chairman • 2. M (Tech)
✓ 3. M (Law) ✓ 4. M (Dev)

Registrar

From: Muhammad Tariq <muhammadtariq30@gmail.com>
Sent: Sunday, December 21, 2025 4:49 PM
To: registrar@nepra.org.pk
Subject: Suggested Solar policy

There is a general perception that rich and wealthy people are the major users of solar energy therefore, they should bear the losses etc. This perception in mind govt tailors solar policies. This is a wring perception most of the solar users upto 10KWh solar system are white collared lower middle or middle class people. Mostly, retired or serving and installed the solar systems out of savings or taking loans from banks or relatives. This is total investment which they can afford. Now if govt changes the policy the rich will switch to non grid or hybrid systems whereas the middle class user will suffer the worst. The investment will be wasted and govt will loose its credibility. If the new policy is unavoidable then the purchasing rates from upto 10KWh producers may not be changed.

Regards

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<input checked="" type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (CRM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Khawaja Abdullah <khawajaabdullah987654321@gmail.com>
Sent: Monday, December 22, 2025 4:03 AM
To: registrar@nepra.org.pk
Subject: Request to Continue Existing Net Metering Policy

Respected Sir

I am writing this feedback as a concerned electricity consumer and net metering customer. I sincerely request NEPRA to please continue the existing net metering policy, as it has now become a basic need for consumers like us.

Installing solar energy systems was not easy. I personally faced many challenges, including high installation costs, technical issues, approvals, and long waiting periods. After going through all these difficulties and investing my hard-earned money, changing the policy at this stage will cause serious financial loss and uncertainty for customers.

Net metering encourages clean energy, reduces load on the national grid, and supports consumers who are trying to contribute positively to Pakistan's energy future. Sudden changes in policy will discourage people from adopting solar energy and will negatively affect trust in long-term government policies.

Therefore, I humbly request NEPRA to please continue the current net metering policy and protect the interests of existing and future solar consumers.

Thank you for your time and consideration.

Yours sincerely,

A Concerned Customer

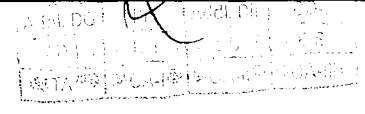
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For kind information, please:

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

From: Rana Raheel <raheel620@yahoo.com>
Sent: Sunday, December 21, 2025 2:07 PM
To: registrar@nepra.org.pk
Subject: Comments about National Electric Power Regulatory Authority (Prosumer) Regulations, 2025



1. According to new draft of policy the prosumers can only install solar system as per their sanctioned load, which was previously 1.5 times of sanctioned load, this in my opinion has no practical impact for Discos other than generating revenue as no wires or meters are required to be changed for domestic users who are using a 1kw to 20kw solar system as the three phase wire and the meter is capable of upto 20kw load so this step makes unnecessary hurdle and loss of money only for the prosumer because even if prosumer wants to apply for load extension there is no single office in pakistan which will do this without taking extra charges other than the demand draft so basically this is going to promote the culture of kharcha pani causing unnecessary loss to the prosumer. Discos can also easily calculate their installed capacity by multiplying sanctioned load of prosumer with 1.5 so there is no negative impact for discos as well. Further more most of the already installed electricity connections are on the name of elders of the house and their licenses are going to expire in 1-2 years, some of them are not alive and their Id cards are blocked as well from Nadra, in this case even if prosumer wants to upgrade sanctioned load this causes undue hardship for prosumer to first get the house registered on his name, (assuming there is no conflict between the family of deceased other wise forget about it) then apply for change of name, then apply for extension of load, respected sir all these steps involve a lot of kharcha pani, now there are two possible ways to look at it, first is the departmental way to just say complain about those who take bribes (which i already have a couple of times and no action has been taken even one of the employee has been retired and my complain is still pending) other way is postpone this policy of "same solar capacity and sanctioned load" until nepra develops an online system that does not involve any communication between the prosumer and the disco personals.
2. Secondly why the license period is reduced from 7 years to 5 years? Do you want every prosumer to suffer from the same steps every five years? What happens if the elder is not alive in next five years? It should be extended to at least 10 years and meanwhile develop a system that prosumer can apply and do all these steps online.
3. You have provided the power to enter in the house of the prosumer for "testing" even when you have all the data online through your online meters, so basically you can check at any given time the maximum export a prosumer has done through your online meter which is your only concern, why increase the interaction of these people with the prosumer when you have all the data at your online server? This is going to promote the culture of kharcha pani.
4. There is no option available for upgrading a solar system from lets say 7kw to 10kw with all the legalities and duties paid by the prosumer, discos has no idea what to do in this case they say to apply for new net metering connection which is unfair to pay all the dues and kharcha Pani again and again.
5. National Power Purchase Price VS National Power Energy Purchase Price, in this regard all the burden is again put on prosumer as if he is the only one getting "benefit" from the solar system. Let me put down some of the benefits the discos get from the systems of prosumers.

A) Due to systems of prosumers the discos are getting enough power to reduce load shedding which can be verified from last years data.

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<input type="checkbox"/> NEA	<input type="checkbox"/> DG (FIR)
<input type="checkbox"/> General Tech	<input type="checkbox"/> General Tech

For kind information, please:

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

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P\ Due to reduced load shedding Discos are getting a huge benefit because they are now able to sell electricity in full day time 10-14 hours causing huge amounts of cash inflow to discos which was previously been wasted since discos were unable to handle load which is now being shared/provided by the prosumer to its neighbours intern reducing load on discos.

C) Due to load reduction on the grid by the power supply from systems of prosumers the grid requires less maintenance/less parts degradation. Saving money for discos.

D) Previous couple of years data show that there has been no low voltage issue during the day time only because of the power provided by the systems of prosumers. Benefit for only Discos.

E) If Discos purchase power from IPP's they charge Fuel Price Adjustments, making electricity costly for non solar users however if prosumers provide electricity to discos FPA will not be charged to non Solar Pakistanis making electricity cheaper.

F) Due to solar systems of prosumers the gov is in a position to negotiate with IPP's which gov already did just because of solar systems of Pakistanis for capacity payments which is a burden on every single Pakistani, making electricity cheaper.

G) No other domestic user is being charged fixed charges only the prosumers are being charged Rs.1000/- every month, more revenue for Discos.

These are just some of the benefits i have written which the Discos are getting from Prosumer. What is prosumer getting in return? We are already paying same price as everyone else in peak hours. Why would you want to squeeze the benefit of off-peak units cancelling with the off-peak exported units when we are the reason for reducing your load shedding, low maintenance cost, high economic activity in country providing jobs and revenue for the business community?

Furthermore now you want to reduce the National Power Purchase Price as well? You pay capacity payments to IPP's where do you give effect of our solar systems? You charge us meter rent of Rs.1000 even though we paid for the meter. What is the justification for that?

You are going to give us National Power Energy Price because according to your understanding we have to do nothing to produce our power, but we have our plants setup, we pay 1000 extra every month, we provide ease to Discos so they can earn more profit which is clearly not possible without our systems. If you can negate these facts please provide what advances have discos made in Distribution losses? We made that possible through our input power at the source instead of using your whole distribution line we are making this possible and Discos and gov is the only beneficiary.

1. We all know that once grid goes off inverters cannot supply power to grid, but you have added a clause at No.5 for insurance of third party injury. How is prosumer responsible for that? Even though a system 5-20kw is not large enough to supply power to grid it will trip it-self and completely shut down since grid's requirement is hundreds of megawatts and domestic users will trip no matter what and if something goes wrong on disco's side which it will as has been going on for years who is going to determine who's fault it is? NEPRA? Who by the looks of it is pro Discos.

If anyone wants to understand this drafted policy just read the section named "rights of Prosumer" at No.5 he/she will understand there are none for prosumer. Even in the section of rights and obligation the drafter wrote another limitation on prosumer that he cannot sell it to other in the area nearby not a single right the prosumer have in this policy not even for face saving. This should be named Anti-sumer policy.
Regards

Registrar

From: atif.saeed@krw.com.pk
Sent: Friday, December 19, 2025 7:43 PM
To: registrar@nepra.org.pk
Subject: FW: Proposed Nepra Prosumers Regulations 2025 - Feedback
Attachments: IMPACT ON EXISTING CONSUMERS AND NECESSARY AMENDMENTS IN NEPRA PROSUMERS REGULATIONS 2025.pdf

Handwritten: *
valuable
Comments

For your information and necessary action, please.

From: atif.saeed@krw.com.pk <atif.saeed@krw.com.pk>
Sent: Friday, 19 December 2025 7:40 pm
To: 'info@nepra.org.pk' <info@nepra.org.pk>
Subject: Proposed Nepra Prosumers Regulations 2025 - Feedback

Handwritten: SP-0-88
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Dear Sir/Madam

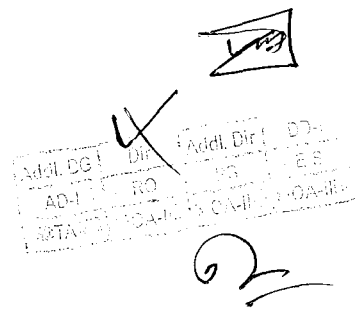
Per to the subject, please forward my attached feedback and concerns to the relevant Department for necessary amendments in the Regulations.

Kindly let me know of the public hearing date on this matter.

You may approach me at below details.

Regards

Muhammad Atif Saeed
Executive Director Assurance & Outsourcing



KRW

Khilji Rahat Waheed, Chartered Accountants
3rd Floor, Rafi Center, G-7/1, Islamabad, Pakistan
Office +92 51 2718336-7
Mobile +92 3331 8555 181

www.krw.com.pk

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (Legal)

For kind information, please:

1. Chairman 2. M (Tech.)
3. M (Law) 4. M (Dev)

IMPACT ON EXISTING CONSUMERS AND NECESSARY AMENDMENTS IN NEPRA PROSUMERS REGULATIONS 2025

A. Likely Impacts on Existing Solar Net Metering Consumers

1. Material Adverse Financial Impact

Existing net metering consumers were economically justified on a **one-to-one energy offset** basis (export units credited at consumer tariff). Under the proposed framework:

- Exported units are credited at the **National Average Energy Purchase Price (NAEPP)**, which is significantly lower than the applicable consumer tariff.
- This results in:
 - Substantial reduction in monthly bill credits.
 - Elongation of payback period for installed solar PV systems.
 - Erosion of the legitimate financial expectations of existing consumers who invested under the 2015 Regulations.

2. Retrospective Change to Contractual and Regulatory Framework

Although Regulation 21 attempts to provide a saving clause, it still:

- Alters the **billing methodology during the subsistence of existing agreements**.
- Introduces retrospective application of a new commercial regime to consumers who:
 - Installed systems,
 - Entered agreements, and
 - Secured financing, under a different regulatory promise.

This raises issues of:

- Regulatory certainty,
- Legitimate expectation,
- Sanctity of contracts.

3. Investment Confidence and Market Disruption

The perceived retroactive dilution of benefits may:

- Undermine consumer trust in NEPRA's regulatory consistency.
- Discourage future distributed generation investments.
- Negatively affect banks, EPCs, and vendors relying on stable net metering policies.

4. Disproportionate Burden on Residential and Small Commercial Consumers

Smaller prosumers, who sized systems closely to consumption, will be more adversely affected than large consumers with diversified loads or storage options.

5. Risk of Legal Challenges

Existing prosumers may challenge:

- The retrospective change in billing terms,
- Reduction of vested rights,
- Unilateral alteration of agreements approved under statutory regulations.

B. Specific Amendments Recommended to Protect Existing Net Metering Consumers

To mitigate the above impacts and ensure regulatory fairness, the following amendments are recommended in the draft regulations:

1. Grandfathering of Existing Net Metering Consumers (Critical Amendment)

Proposed Amendment to Regulation 21(2)

Current text (abridged):

"...except the billing shall be in accordance with regulation 14 commencing from the billing cycle subsequent to the month in which these regulations come into effect..."

Recommended Amendment:

"...nothing shall affect or be deemed to affect the licence issued, agreement executed, tariff methodology, or billing arrangement approved under the repealed regulations before commencement of these regulations, and **such distributed generators shall continue to be billed strictly in accordance with the net metering mechanism and tariff applicable at the time of execution of their agreement for the entire original term and all subsequent renewals thereof**, unless the prosumer voluntarily opts for transition to the new regime."

Rationale:

This ensures full grandfathering and protects legitimate expectations.

2. Protection Against Mid-Term Tariff Revision

Amendment to Regulation 14(3)

Current text:

"The Authority may revise the rate... during the subsistence of the agreement..."

Recommended Amendment:

"Provided that **no such revision shall apply to distributed generators having valid agreements executed prior to the commencement of these regulations**, unless expressly agreed to by the prosumer."

Rationale:

Prevents unilateral tariff dilution during an agreed term.

3. Optional Migration Clause Instead of Mandatory Transition

Insert a new sub-regulation under Regulation 21:

"Existing distributed generators may, at their discretion, opt to migrate to the net billing arrangement under these regulations by executing a revised agreement with the licensee; **such migration shall be voluntary and irrevocable.**"

Rationale:

Allows flexibility without coercion.

4. Clarification of 'National Average Energy Purchase Price'

Amend Regulation 14(1)(b) to include:

"...as determined, published, and periodically notified by the Authority in a transparent manner, along with methodology and data sources."

Rationale:

Ensures transparency and predictability, particularly if applied to future consumers.

5. Explicit Non-Retroactivity Clause

Insert a new regulation:

"Nothing contained in these regulations shall be construed to operate retrospectively so as to prejudice any right, benefit, or obligation accrued under the repealed regulations prior to their commencement."

Rationale:

Strengthens legal defensibility and reduces litigation risk.

C. Concluding Observation

While the shift from net metering to net billing may be a policy choice driven by system-wide cost considerations, **applying such changes to existing consumers without full grandfathering is neither equitable nor regulatorily sound.** Protecting existing prosumers will:

- Preserve investor confidence,
- Uphold regulatory credibility,
- Reduce legal exposure for NEPRA and DISCOs.

Registrar

From: Blaze FN <davionxbox489@gmail.com>
Sent: Friday, December 19, 2025 7:12 PM
To: registrar@nepra.org.pk
Subject: OBJECTION: Draft Prosumer Regulations 2025 – Retrospective Application of Regulation 14

Dear Registrar,

I am writing to formally object to the Draft National Electric Power Regulatory Authority (Prosumer) Regulations, 2025. My objection is specific to the proposed treatment of existing Distributed Generator (DG) license holders.

While the draft regulations appear to offer a "grandfathered" rate (NAPP) to existing users, this protection is rendered meaningless by the simultaneous application of Regulation 14 ("Net Billing"). Moving existing users from the current "Net Metering" (1:1 unit off-setting) mechanism to a "Net Billing" (monetary settlement) mechanism constitutes a fundamental breach of contract.

Existing users signed 7-year agreements based on the specific financial model of 1:1 unit exchange. Even if you maintain a higher buyback rate for us, shifting the underlying accounting mechanism to "Net Billing" destroys the value of our Vested Rights and alters the core consideration of the contract. You cannot retrospectively change the billing methodology for a closed transaction.

I demand that Regulation 14 be amended to include a specific proviso stating that it shall NOT apply to any license issued under the 2015 Regulations. Existing users must remain strictly on the "Net Metering" (1:1 unit-based) system for the entire duration of their valid 7-year licenses. Any attempt to force these users onto a "Net Billing" regime before their contracts expire will be viewed as a violation of law and will be challenged.

Sincerely,

A Concerned Citizen

Registrar

From: public opinion <publicopinion058@gmail.com>
Sent: Saturday, December 20, 2025 1:40 PM
To: registrar@nepra.org.pk
Subject: Public Opinion regarding NEPRA Prosumer Regulations 2025
Attachments: The Registrar NEPRA regarding prosumer regulations.docx

The Registrar NEPRA
Islamabad
Subject: Public Opinion regarding NEPRA Prosumer Regulations 2025

Respected sir,

NEPRA has published Prosumer Regulations for promulgation 2025 and required public comments. In this regard it is stated that it is a good step by the Authority to save the national grid and allow the consumers to obtain net-metering facilities, but consumers faced a lot of problems at the level of DISCOS. Each DISCO and even each circle of each DISCO has its own procedures and s.o.p's for sanctioning net-metering connections. In IESCO up to 250 K.W. connections of all tariff categories are sanctioned by S.D.O.'s in connivance with S.D.O. P@I. Prosumers of IESCO are happy with this s.o.p as they must consult only one office at S.D.O. level which is easily approachable for them. However, in some DISCOS net-metering files are entered in D.G. MIRAD office, in some DISCOS, these files are entered in S.E. office or X.E.N office and some DISCOS also include the useless process of getting feasibility done by M&T office, which is purely a metering-related office. This can easily be done by field offices by S.D. O's and X.E. Ns to avoid delays. All these lengthy and myriads of unnecessary procedures are already creating a lot of problems for the consumers, and these problems will increase once prosumer regulations are implemented without mentioning the procedures from file entry to doing feasibility to sanctioning connection, issuing demand notices and installing meters.

Hence, it is imperative for NEPRA to either amend consumers services manual or include this new agenda in the prosumer's regulations before its promulgation. NEPRA should clearly define the role of each office of DISCO that who will enter file up to how many kilowatts, who will do the feasibility, who will sanction the connection and issue demand notice and who will install the meter. NEPRA should also mention time frame of each office clearly by naming the said office such as S.D.O. or X.E.N., etc. This will save time of consumers, and it will also create uniform net-metering installation procedure in whole of the Pakistan and consumers will be saved from the red tapes of DISCOS. Apart from that, NEPRA should create an online portal like the ENC portal of DISCOS which is currently in use for new connections for the net-metering so that all the process should be completed online along with hard copy of files. The sanctioning offices must complete all procedures up till the billing online and file should also be sent to NEPRA for licensing through that online portal by the concerned office of DISCO along with the original hardcopy of file to avoid unnecessary delays and ensure transparency and facilitation to the consumers or as a first step PITC or DISCOS may be asked to include net-metering files in the existing ENC system as per the competency defined by NEPRA. For example, NEPRA should mention that net-metering files up to 25 KW of all tariffs will be entered in the office of S.D.O. After scrutinizing the documents, S.D.O., L.S AND MRSS will jointly verify the site for feasibility, then feasible cases should be forwarded to NEPRA for the purpose of licensing along with the actual site pictures of solar panels, S.P. D's and inverter. Once, license is received, S.D.O. will issue the demand notice for the meter and after payment the meter will be sent to M&T for testing and installation of sim and S.D.O. will get the meter installed at site personally under his supervision. In the same way NEPRA can issue instructions for net-metering connections having load above 25 K.W. It is recommended that all files of all tariffs up to 250 K.W. should be entered in the office of S.D.O. concerned for prosumers'

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (E/ECM)

For kind information, please,

1. Chairman 2. M (Tech)

3. M (Admin) 4. M (Legal)

facilitation. However, for the purpose of feasibility above 25 K.W. concerned operation X.E.N. should be the convenor along with concerned S.D.O. and L.S. as members. After feasibility and license, demand notice and installation procedure should also be done by S.D.O. to facilitate prosumers as they do not have to run from pillar to post by visiting several offices. Thanks

Regards

PUBLIC OPINION FOR BETTER POWER SYSTEM STRUCTURE

Registrar

From: Zaheer Abbas <zaheer_thull@icloud.com>
Sent: Sunday, December 21, 2025 12:21 AM
To: registrar@nepra.org.pk
Cc: cad@nepra.org.pk; info@nepra.org.pk
Subject: Public Objections & Feedback on Draft Prosumer (Net Metering) Regulations 2025

Respected Sir/Madam,

I hope this email finds you well.

I am writing to submit my objections and public feedback on the Draft Prosumer (Net Metering) Regulations 2025 issued by the National Electric Power Regulatory Authority (NEPRA) for public consultation.

While I appreciate NEPRA's efforts to ensure grid stability and address challenges arising from the rapid growth of solar energy in Pakistan, I am concerned that certain proposed amendments may unintentionally discourage industrial, commercial, and responsible prosumers who have invested in renewable energy to reduce dependence on the national grid.

My key concerns and suggestions are outlined below:

Reduction in Buyback Rate

The proposed reduction of the buyback rate from approximately Rs. 26/unit to the National Average Energy Purchase Price (around Rs. 13/unit) is a significant cut.

Such a sharp reduction will substantially reduce the attractiveness of net metering, and many consumers may lose interest in installing net metering systems altogether.

More importantly, reduced net metering adoption will deprive the government of access to relatively low-cost solar-generated electricity. As a result, the national grid will become increasingly dependent on more expensive sources of power generation,

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<input type="checkbox"/> ADG (TIT.)	<input type="checkbox"/> DG (Fin.)
<input type="checkbox"/> GLA	<input type="checkbox"/> Dir. (L.F.)
<input type="checkbox"/> Engrs/ Tech.	<input type="checkbox"/> Consultant

For kind information, please:

1. Chairman 2. M (Tech.)
3. M (Law) 4. M (Dev.)

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AD-5	AD-6	AD-7	AD-8

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including imported fuels and high-cost thermal plants, which will increase electricity procurement costs and fiscal pressure on the government.

A gradual or tiered buyback mechanism is therefore strongly recommended instead of an abrupt reduction.

2. Net Metering Should Remain Unit-for-Unit

The proposed shift toward separate import and export metering, instead of true unit-for-unit netting, undermines the core principle of net metering.

If electricity imported from the grid is charged at full retail tariffs while exported solar electricity is compensated at a much lower rate, it will cause serious disappointment and loss of confidence among solar consumers. This approach effectively converts net metering into a net billing system, making solar investments financially unattractive.

Such a change will discourage future solar installations and ultimately harm the government as well, by reducing private sector contribution of affordable solar power and increasing reliance on costly electricity sources.

It is respectfully requested that NEPRA retain the unit-for-unit net metering mechanism, which has proven successful and sustainable in Pakistan.

3. Limiting Solar Capacity to Approved Load

Restricting solar system capacity strictly to the approved load removes flexibility for industries with seasonal demand variations or future expansion plans.

Allowing solar capacity up to 1.25 times the approved load, subject to technical feasibility, would be a more balanced approach.

4. Reduction of Contract Period to Five Years

Reducing the net metering agreement period from seven years to five years increases uncertainty and discourages long-term investment.

A minimum contract duration of seven years should be retained, particularly for commercial and industrial prosumers, to ensure reasonable return on investment.

5. 80% Transformer Capacity Restriction

Allowing DISCOs to stop accepting new net metering applications once solar penetration reaches 80% of transformer capacity may lead to arbitrary rejections.

Instead of outright refusal, DISCOs should be encouraged to upgrade infrastructure based on technical assessments.

6. Mandatory Technical Feasibility for 250 kW and Above

While technical review is understandable for large systems, mandatory feasibility studies at the 250 kW threshold may delay genuine industrial projects.

Clear timelines and transparent procedures should be defined to avoid unnecessary delays.

Conclusion

Net metering has been one of Pakistan's most successful renewable energy initiatives, providing affordable electricity, reducing peak load pressure, and supporting national energy sustainability. Replacing unit-for-unit net metering with a separate import-export mechanism and significantly reducing incentives may reverse this progress and increase dependence on costly power generation sources.

I respectfully request NEPRA to reconsider these concerns and adopt a balanced, gradual, and industry-friendly approach in the final Prosumer Regulations 2025.

Thank you for providing the opportunity for public consultation.

Yours sincerely,

Zaheer Abbas Bhatti

Industrial Consumer / Prosumer

Sindh, Pakistan

03453947777

Registrar

From: ZAHEER BABAR <zaheerpak@hotmail.com>
Sent: Sunday, December 21, 2025 7:31 AM
To: registrar@nepra.org.pk
Subject: New net metering policy

Dear Sir,

I am writing as a concerned electricity consumer to formally express my strong disagreement with the recently introduced/revised Net Metering Policy. The proposed changes appear to be unfair, discouraging, and against the interests of consumers who have invested in renewable energy solutions in good faith.

Net metering was introduced to promote clean and sustainable energy, reduce dependence on fossil fuels, and encourage consumers to invest their personal resources in solar power generation. Thousands of consumers made significant financial investments based on the policy framework and assurances previously provided. The sudden revision of buyback rates and other terms undermines consumer confidence and places an unjust financial burden on households and small businesses.

The revised policy:

- Significantly reduces the economic viability of existing and future net metering systems
- Disincentivizes renewable energy adoption
- Creates uncertainty for consumers who planned investments based on earlier regulations
- Appears to favor distribution companies at the expense of ordinary consumers

Such changes contradict the broader national objectives of energy sustainability, carbon reduction, and energy cost relief for citizens.

I respectfully request NEPRA to reconsider the revised net metering policy, engage with stakeholders transparently, and ensure that consumer rights and prior commitments are protected. Any policy changes should be prospective, fair, and balanced, without penalizing existing net metering consumers.

I sincerely hope NEPRA will review this matter in the larger public interest and take corrective measures to restore confidence in the regulatory framework.

Thank you for your time and consideration.

Yours sincerely,
Zaheer Uddin Babar
Concerned Consumer
Pakistan

Forwarded please:

☒ For nec. action

☐ For information

<input checked="" type="checkbox"/> DG (Lic.)	<input type="checkbox"/> DG (Admin/HR)
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<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (LT)
<input type="checkbox"/> Consult (Tech)	<input type="checkbox"/> Consult (Admin)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

Registrar

From: Abid Masroor <abid.masroor@yahoo.com>
Sent: Tuesday, December 23, 2025 8:55 AM
To: registrar@nepra.org.pk
Subject: Objections to draft NEPRA (Prosumer) Regulations 2025- Additional Adverse impact on BTPL Consumer.

The Registrar
(NEPRA)
Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
ABID MASROOR

[BTPL Consumer /
House No. 1651 Street 58 Phase 3 Bahria Town Islamabad.
Dated. 23rd December, 2025

Sent from my iPhone

Forwarded please:

☒ For rec. action

☐ For information

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<input type="checkbox"/> ADG (Trd.)	<input type="checkbox"/> DG (Fin.)
<input checked="" type="checkbox"/> SLA	<input type="checkbox"/> Dir. (I.T)
<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (GRCM)

For kind information, please.

1. Chairman 2. M (Tech)
3. M (Law) 4. M (Dev)

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Chairman NEPRA

From: Ahsen Ali <ahsen9pk@gmail.com>
Sent: Thursday, December 18, 2025 11:17 PM
To: registrar@nepra.org.pk
Cc: Chairman@nepra.org.pk; info@nepra.org.pk; mirad@fesco.com.pk; ceo@fesco.com.pk
Subject: Request for Administrative Directions to DISCOs and Public Clarification Regarding Draft NEPRA (Prosumer) Regulations, 2025
Attachments: Nepra Adj.jpeg

Registrar

Respected Sir,

With reference to the subject cited and regarding the **refusal by certain DISCOs to accept net metering applications** on the premise that the **NEPRA (Prosumer) Regulations, 2025 have come into force**, while they have been published by NEPRA for **eliciting public opinion** (copy of newspaper ad attached), I respectfully submit the following for the Authority's kind consideration.

1. Administrative Misapplication by DISCOs

It is being observed across multiple DISCO jurisdictions that:

- Net metering applications are **not being accepted or processed**, and
- Field offices are **treating draft Prosumer Regulations as enforceable law**.

REGISTRAR OFFICE
Dy. No. 14937
Date: 23.12.25

This practice is administrative in nature and is occurring **under NEPRA's regulatory oversight**, despite the absence of any **Official Gazette notification** as required under **Section 47(1) of the NEPRA Act, 1997**.

2. Legal Position (Statutory & Judicial)

Statutory Framework

- Section 47(3), NEPRA Act, 1997**
Requires publication of proposed regulations **for public opinion prior to enforcement**.
- Section 47(1), NEPRA Act, 1997**
Regulations acquire legal force **only after notification in the Official Gazette**.

Forwarded please:

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EBCOM)

For kind information, please.

1. Chairman * 2. M (Tech)
3. M (Law) * 4. M (Dev)

Accordingly, the **Prosumer Regulations, 2025 remain draft and unenforceable**, and the **NEPRA Distributed Generation & Net Metering Regulations, 2015** continue to remain valid and operative.

Supreme Court of Pakistan – Administrative Law Principles

CHAIRMAN

Dy No. 7272
Date: 19-12-25

1. **Government of N.W.F.P. v. Said Kamal Shah**

(PLD 1986 Supreme Court 360)

The Honourable Supreme Court categorically held that **rules, regulations, or instructions which are not duly notified in the Official Gazette do not acquire the force of law and cannot be enforced**, nor can any rights or obligations be created thereunder.

2. **Abdul Karim v. Government of Pakistan**

(PLD 2016 Supreme Court 705)

The Supreme Court reaffirmed that **administrative actions must strictly conform to statutory requirements**, and that **unnotified or informal instruments cannot be relied upon to regulate rights, liabilities, or conduct of citizens**.

These judgments establish the settled principle that **administrative authorities cannot act on draft, proposed, or unnotified regulatory instruments**.

3. Compounding Effect of Media Misreporting

Simultaneously, incorrect reporting by sections of print and electronic media — suggesting that the Prosumer Regulations are already in force — is:

- Reinforcing **ultra vires administrative conduct** by DISCOs
- Creating confusion among consumers and investors
- Undermining regulatory certainty in the distributed generation and renewable energy sector

4. Respectful Request for NEPRA's Immediate Intervention

In order to restore legality, uniformity, and regulatory clarity, we respectfully request the Authority to:

(a) Issue Explicit Administrative Directions to All DISCOs

Directing them to:

- Continue acceptance and processing of net metering applications strictly under the **NEPRA Distributed Generation & Net Metering Regulations, 2015**
- Refrain from acting upon **draft or unnotified regulations**
- Ensure consistent compliance across all field formations

(b) Issue an Official Public / Media Clarification

Clearly stating that:

- The Prosumer Regulations, 2025 are **not yet in force**
- They shall only take effect after **finalization and Gazette notification**
- Existing net metering regulations remain applicable until such time

5. Regulatory Importance

Such timely intervention is essential to:

- Prevent continued ultra vires administrative practices
- Avoid financial and contractual disputes
- Maintain investor confidence in distributed renewable energy
- Uphold the Authority's statutory mandate and rule of law

We shall be grateful for NEPRA's guidance and directions to ensure lawful and orderly regulatory implementation.

Yours sincerely,

 Engr. Dr. Muhammad Ahsen Ali

(Ph.D. Electrical Engineering)

Ex-S.E (Chashma Nuclear Power Plant-1)

Professional Engineer (Pakistan Engineering Council)

COO

Shahzad Solar (Private) Limited
Jhang Road Faisalabad, Punjab

Ph#+92342-2334444



From: Malik Usman Gul <malik_gul87@msn.com>
Sent: Monday, December 22, 2025 11:42 PM
To: registrar@nepra.org.pk
Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

The Registrar
 (NEPRA)
 Islamabad

Subject: Objections to Draft NEPRA (Prosumer) Regulations, 2025 – Additional Adverse Impact on BTPL Consumers

Sir,

I submit my objections to the Draft NEPRA (Prosumer) Regulations, 2025, published through the press advertisement dated 12 December 2025 and uploaded on NEPRA's website.

Proposed changes to the net-metering/prosumer framework will cause serious financial loss to solar consumers who installed solar systems under an approved legal regime with legitimate expectations of affordable electricity. Any reduction in export value or adverse change in settlement mechanisms will deprive consumers of cheaper self-generated electricity and defeat the very purpose of net-metering.

As a consumer of (BTPL) I am already adversely affected by:

Arbitrary deduction/reduction of solar export units, Illegal charges imposed under the guise of tariff adjustments, and "Misc.Charges" routinely added to electricity bills, which do not exist in the bills of any other electricity distribution company anywhere in Pakistan.

In this background, the proposed draft regulations will further aggravate the financial exploitation of solar consumers, effectively using prosumers to offset inefficiencies, losses, theft, and non-recovery of distribution companies, for which consumers are in no way responsible.

Such an approach is unjust, discriminatory, and contrary to the objectives of renewable energy promotion, regulatory certainty, and consumer protection.

I respectfully request NEPRA to:

Reject any adverse or retrospective changes affecting existing net-metering consumers; Ensure that prosumers are not penalized to cover DISCO/utility losses and theft of electricity and Protect solar consumers from arbitrary deductions, illegal charges, and non-transparent billing practices, particularly in the case of BTPL.

These objections may kindly be placed on record and duly considered before finalization of the regulations.

Yours sincerely,
 Usman Gul

Street 17 Phase 6 Bahria town Rawalpindi

Sent from my iPhone

Forwarded please:

☒ For noc. action ☐ For Information

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (EPRM)

For kind information, please.

1. Chairman 2. M (Tech)
 3. M (Law) 4. M (Dev)

Man

14979
 23-12-25

From: Rehan Jawed <rehanjawed01@hotmail.com>
Sent: Thursday, December 18, 2025 12:46 AM
To: awaisleghari@hotmail.com; chairman@nepra.org.pk; Registrar; amina.ahmed@nepra.org.pk; mubashar.jalal@nepra.org.pk; Consumer Affairs Department
Subject: Subject: Comments on Draft Nepra Prosumer Regulations 2025, Transition from Net Metering to Net Billing, Industrial Cross Subsidy, and the Need to Rationalize Fixed Charges for Distributed Solar Consumers
Attachments: 1000187113.jpg

Sardar Awais Ahmad Leghari,
 Honourable Federal Minister
 Ministry of Energy Power Division
 Government of Pakistan
 Islamabad

Chairman,
 National Electric Power Regulatory Authority
 Islamabad

Registrar,
 National Electric Power Regulatory Authority
 Islamabad

Dear All,

I would like to congratulate you and your teams on initiating the transition from the earlier net metering framework to the net billing regime. I have been repeatedly highlighting the undeserved benefit being availed by net metering users. This shift reflects an important policy recognition that energy exported to the grid and energy imported from the grid must be valued separately in order to improve transparency and system discipline.

At the same time, I wish to highlight a structural gap that, if left unaddressed, will continue to undermine tariff rationalization efforts and exacerbate the industrial cross subsidy burden, which currently stands at approximately Rs 131 billion annually.

While the transition to net billing corrects energy pricing distortions, it does not adequately address recovery of fixed grid costs from distributed solar consumers. Residential consumers under net billing continue to rely on the national grid as a full standby and balancing mechanism, yet their contribution towards capacity payments, network fixed costs, and system availability remains disproportionately low. As a result, these costs continue to be shifted onto industrial and fully grid dependent consumers.

This imbalance has two serious implications. First, it directly sustains and potentially increases the cross subsidy burden imposed on industry, further weakening competitiveness, exports, and electricity demand. Second, it significantly improves the economics of combining rooftop solar with battery energy storage systems. After transition from net metering to net billing, There is a massive flood of Battery about to come in, which will result in residential

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<input type="checkbox"/> Consult (Tech.)	<input type="checkbox"/> Consult (CIVICM)

For kind information, please:

1. Chairman	2. M (Tech)
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Registrar

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		OA-III

CHAIRMAN
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 19.12.25
 Dy No. 7231
 Date: 18-12-25

users keeping grid on standby without paying anything against fixed cost of grid which will ultimately be recovered from Industry.

As grid tariffs rise and fixed costs remain under recovered from net billing consumers, higher income households will logically invest in large battery systems, progressively reducing their grid dependence while still expecting grid availability. This will accelerate demand erosion, increase stranded capacity costs, and intensify tariff pressure on remaining consumers.

Unless fixed charges are imposed on net billing consumers on a per kW (Sanctioned load) basis, the transition from net metering to net billing will remain incomplete from a cost recovery perspective. Demand will continue to shrink, grid costs will be socialized over a smaller consumer base, and industrial cross subsidies will persist despite policy intentions to reduce them.

I respectfully submit that fixed charges should be applied to net metering /Net billing consumers based on sanctioned load, at a rate of Rs 1,250 per kW. Such a measure would materially improve recovery of grid fixed costs, reduce reliance on industrial cross subsidies, and align the net billing framework with the economic realities of a capacity constrained power system, particularly as tariff rebasing approaches.

This is not a punitive intervention. It is a necessary structural correction to protect grid sustainability, lower the Rs 131 billion cross subsidy burden on industry, and prevent an uncontrolled shift towards battery driven grid defection by affluent residential consumers.

I hope these comments are received in the spirit of constructive policy engagement, and I will send further comments on this matter.

Yours sincerely,

Rehan Javed
Industrial Consumer
03458256891