

National Electric Power Regulatory Authority Islamic Republic of Pakistan

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No. NEPRA/SA(M&E)/LAD-35/ 12414

August 08, 2025

Chief Executive Officer, Sukkur Electric Power Company Limited (SEPCO), Administration Block, Thermal Power Station, Old Sukkur

Subject:

Order of the Authority in the matter of Explanation issued to SEPCO under Regulation 4(1) and 4(2) of NEPRA (Fine) Regulations, 2021, on account of failure to execute Earthing/Grounding of HT/LT Poles/Structures in its service territory

Please find enclosed herewith, the Order of the Authority (total 10 page) in the subject matter for information and compliance.

Enclosure: As above

(Wasim Anwar Bhinder)



National Electric Power Regulatory Authority

ORDER

IN THE MATTER OF EXPLANATION ISSUED TO SEPCO UNDER REGULATION 4(1) AND 4(2) OF NEPRA (FINE) REGULATIONS, 2021, ON ACCOUNT OF FAILURE TO EXECUTE EARTHING/GROUNDING OF HT/LT POLES/STRUCTURES IN ITS SERVICE TERRITORY.

1. Sukkur Electric Power Company Limited (SEPCO) (the "Licensee") was granted a Distribution License (No. 21/DL/2011) by the National Electric Power Regulatory Authority (the "Authority") on August 18, 2011, for providing Distribution Services in its Service Territory as stipulated in its Distribution License, pursuant to section 21 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 ("NEPRA Act").

Background:

3.

NEPRA AUTHORITY

- 2. During the investigation conducted by NEPRA with respect to Fatal Accidents in DISCOs, it was observed that the distribution facilities of DISCOs, such as poles/structures, lack earthing/grounding, which is one of the major causes of the occurrence of fatal accidents. The Authority while taking notice of such serious safety hazards directed the Licensee vide letter dated June 07, 2022, followed by reminders dated July 06, 2022, and August 02, 2022, to submit the data pertaining to the total number of poles/structures, number of poles/structures already earthed/grounded, and number of poles/structures to be earthed/grounded. Accordingly, the Licensee submitted the required information vide its letter dated August 12, 2022.
 - The Authority after carefully examining the data submitted by the Licensee called CEO of the Licensee vide letter dated September 26, 2022, for a meeting/hearing via Zoom at NEPRA Head Quarter with the direction to come up with a comprehensive plan along with specific timelines pertaining to execution of earthing/grounding of HT/LT poles/structures in its service territory, in order to avoid fatal accidents in future. The Authority also directed that the Licensee shall submit the response to specific queries/questions including, SOP of the Licensee pertaining to earthing/grounding of the poles/structures, scope of earthing in the contracts at the time of their installation, checking of poles/structures grounding at the time of handing over of the system from construction to operation departments, tackling these hazards in the absence of proper earthing/grounding, and time required to execute the earthing/grounding of 100% of the remaining poles/structures.
- 4. Accordingly, the said meeting/hearing was held on October 04, 2022, wherein, the Authority directed the Licensee to submit complete details of PCC poles and steel structures with and without earthing/grounding. The Authority further directed the Licensee to submit a comprehensive plan of the execution of earthing/grounding of poles & structures along with concrete timelines. Moreover, the Authority also desired

Page 1 of 10

that the Licensee should provide a mechanism on how they will efficiently perform the execution task within the minimum possible time. A letter dated October 28, 2022 containing all above directions was also sent to the Licensee.

- 5. In addition to above, NEPRA Regional Office, Sukkur, also reported and affirmed that in past contracts, the scope of earthing/grounding was only included in Steel Structures. However, in the latest contracts, the scope of earthing/grounding was included in both the Steel Structures and PCC poles and the same is present in the field too. The Regional Office further highlighted that Steel Structures installed in the past had earthing/grounding, however, the same has become ineffective due to deterioration and change of moisture contents at the sites over the passage of time. The same was also endorsed by the Licensee in its submitted replies.
- 6. In response to NEPRA's letter dated October 28, 2022, the Licensee vide its letter dated November 25, 2022, submitted its response against the aforementioned directions & queries of the Authority. The Licensee interalia, stated that it has deployed all Directorates of PD (Construction) to check the feeder/pole-wise status of earthing rods, either installed or not installed. Accordingly, eighty-eight (88) feeders have been surveyed/completed by PD (Construction), and the remaining are under process. Additionally, the Licensee vide the said letter also committed that it is trying its best to complete 100% of the project job for the execution of earthing/grounding of poles/structures up to the end of 2023. The details of HT/LT structures already earthed or to be earthed as submitted by the Licensee is as under:

Total :	Details of I	HT Poles/Str	uctures	Details of I	LT Poles/Stru	ctures	Total 🛫 🐇	Total
Number	Total ***	HT Poles/	HT Poles/	"Total 💎 🖰	LT. Poles/	LT Poles/	Number	Number
					Structures			
	of HT						Poles/	
Structure		Earthing	Earthed	[李]·英麗海[[[[西]]]][[[[[]]]][[[]]]	Earthing	Earthed :		
S ==	Structures			Structures	自 5 当实验证		s have	10 - 20 to 10 to 1
19 19 19 19 19 19 19 19 19 19 19 19 19 1		* ***		30.440	517 41 415,36	1 1 1 1 1 1 1	Earthing	
894,117	506,875	335,257	171,618	387,241	272,450	114,791	607,708	286,409

7. In this regard, it was observed that, since October 2022, the said survey had still not been completed by the Licensee, which depicted that the progress on Licensee's part is very poor. If the survey had not been completed despite the lapse of almost six months, then how will the Licensee execute earthing/grounding of 286,409 Nos. of HT/LT structures by the end of 2023? The Licensee's submitted plan seemed unrealistic and impractical, which showed its non-seriousness towards the execution of earthing on a war footing basis.

8.

NEPRA

AUTHORITY

Moreover, vide NEPRA's letter dated January 31, 2023, the Licensee was again directed to submit its revised plan in the light of observations highlighted by NEPRA. Meanwhile, Member (Technical), NEPRA during the visit of the Licensee's Headquarters on January 28, 2023, expressed serious concerns about the non-execution of earthing/grounding of poles/structures by the Licensee. In response, the Licensee vide its letter dated February 22, 2023, submitted that the available stock of earthing rods is 180 numbers only, and procurement of 10,000 earthing rods is under process. The availability of 180 earthing rods and procurement of only 10,000 rods as compared to 286,409 poles/structures again shows the Licensee's intentions towards timely completion of this task and subsequent inculcating a safety culture. Furthermore, the Licensee has shown its inability to fast-track its procurement process by giving reasons

Page 2 of 10

that the suppliers are least interested to participate in material procurement due to the economic condition of the country. The argument put forward by the Licensee does not seem justified as it has not provided any detail that how many times it has tried to award contracts and in which newspapers, it published the same. Additionally, if the Licensee will award the contract in bulk rather than in a very small quantity i.e., 10,000, then potential bidders may participate and take risks as the contract will be of bigger size.

- 9. The Licensee vide its letter dated February 22, 2023, submitted that it has completed a fresh survey and accordingly, the revised figures of HT/LT unearthed structures are 174,995. The Licensee further submitted that it is committed to complete the job by the end of 2024 upto the extent of structures only. However, the Licensee did not submit any figures/numbers regarding PCC poles, which were required to be earthed too. The submission of the revised number of structures by the Licensee shows that it had completed the survey after a lapse of seven months. Whereas, the Licensee submitted in its earlier letter that it will execute earthing by the end of 2023. All these statements clearly indicated that the Licensee did not have any plan to execute this important task. The Licensee should have realized that the operation of poles/structures without earthing/grounding in the field is highly dangerous and can lead to the occurrence of fatal accidents at any time. The Licensee was trying to mislead the Authority by manipulating the facts and hiding its inefficiencies.
- 10. Therefore, the Authority decided to initiate legal proceedings against the Licensee under the NEPRA Fine Regulations, 2021.

Explanation:

- 11. In view thereof, an Explanation was served to the Licensee under Regulation 4(1) and 4(2) of NEPRA (Fine) Regulations, 2021, vide NEPRA's letter dated April 27, 2023, on account of violation of Section 21(2)(f) of the NEPRA Act, Article 11 of the Distribution License read with Rule 4(g) of the NEPRA Performance Standards (Distribution) Rules, 2005, Clause 4 of Safety Requirements, Clause 4 of Design Code & Clause 1 of Protection Requirements of the Distribution Code, 2005, and Clause 12.2 of Chapter 12 of the Consumer Service Manual, 2021.
- 12. The Licensee, vide its letter dated June 27, 2023, submitted its response. Furthermore, in order to satisfy the requirement of law, a hearing in light of Regulation 4(5) of NEPRA (Fine) Regulations, 2021, was held on December 27, 2023, wherein, CEO of the Licensee, along with his team, participated and made their submissions.

Show Cause Notice

13.

AUTHORITY

The Authority considered the submissions of the Licensee and after detailed deliberations rejected the response submitted by the Licensee against the Explanation served upon it and directed to issue a Show Cause Notice (SCN) to the Licensee under Regulation 4(8) & (9) of the NEPRA (Fine) Regulations, 2021 on account of violation of Section 21(2)(f) of the NEPRA Act, Article 11 of the Distribution License read with Rule 4(g) of the NEPRA Performance Standards (Distribution) Rules, 2005, Clause 4 of Safety Requirements, Clause 4 of Design Code & Clause 1 of Protection Requirements of the Distribution Code, 2005, and Clause 12.2 of Chapter 12 of the Consumer Service Manual, 2021.

- 14. Accordingly, NEPRA vide letter dated March 20, 2024, issued an SCN to the Licensee upon failure to execute earthing/grounding of HT/LT poles/structures in its service territory. The salient points of the served SCN are as follows:
 - 3. WHEREAS, pursuant to section 21(2)(f) of the NEPRA Act, the Licensee is required to follow the performance standards laid down by the Authority for distribution and transmission of electric power, including safety; and
 - 4. WHEREAS, pursuant to Rule 4(g)(ii), Overall Standards 7-Safety of NEPRA Performance Standards (Distribution) Rules:
 - "A distribution company shall ensure that its distribution facilities do not cause any leakage of electrical current or step potential beyond a level that can cause harm to human life, as laid down in the relevant IEEE/IEC Standards; prevent accessibility of live conductors or equipment; and prevent development of a situation due to breakdown of equipment which results in voltage or leakage current that can cause harm to human life, property and general public including without limitation, employees and property of the distribution company."
 - 5. WHEREAS, according to clause SR 4 Safety Management Criteria of Distribution Code:
 - b. "A distribution company shall ensure that its distribution facilities do not cause any leakage of Electrical Current or Step Potential beyond a level that can cause harm to human life, as laid down in the relevant IEEE/IEC Standards; prevent accessibility of live conductors or equipment; and prevent development of a situation due to breakdown of equipment which results in voltage or leakage current that can cause harm to human life, property and general public including without limitation, employees and property of the distribution company."
 - 6. WHEREAS, as per clause DDC 4, Design Code- Earthing of Distribution Code:
 - "... The earthing of a distribution transformer, the neutral, and body of the transformer should be connected to ground rods as per IEC and PSI Standards Design Specifications. Earthing of Consumer Service and its meter shall be as per design standards adopted by the Licensees; and consistent with IEC, and IEEE Standards. The earth resistance of the distribution transformers and HT/LT structures/poles shall not be more than 2.5Ω and 5Ω respectively."
 - 7. WHEREAS, pursuant to clause PR 1 Protection System Practices and System Coordination of Distribution Code:
 - "The Licensee shall follow suitable and necessary provisions regarding protection system practices and co-ordination such as the following but not limited to achieve the aims of proper functioning of the distribution system of the Licensee at all times:
 - h. ... Provide protective earthing devices."

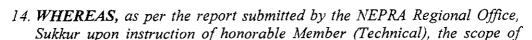
- 8. WHEREAS, as per clauses 12.2.4 and 12.2.5 of Chapter 12 of the Consumer Service Manual:
 - "12.2.4. The earthing systems installed shall be dimensioned and regularly tested to ensure protection from shock hazards.
 - 12.2.5. The steel structure installed on the public places shall be earthed at one point through steel/copper conductor, in accordance with the DISCO laid down procedures."
- 9. WHEREAS, the Authority issued an Explanation to the Licensee under Regulation 4(1) and 4(2) of NEPRA (Fine) Regulation, 2021 on April 27, 2023, on account of failure to execute earthing/grounding of HT/LT poles/structures in its service territory. The salient points of the said Explanation are reproduced below:
 - 9. "WHEREAS, during the investigation conducted by NEPRA with respect to fatal accidents in DISCOs, it was observed that the distribution facilities of DISCOs particularly HT/LT poles/structures lack earthing/grounding which is one of the major causes of the occurrence of fatal accidents. The Authority took notice of such serious safety hazards and directed to obtain data from all the DISCOs including the Licensee, with respect to the total number of HT/LT poles/structures, the number of HT/LT poles/structures already earthed/grounded, and the number of HT/LT poles/structures to be earthed/grounded. The same was obtained vide Licensee's letter dated August 12, 2022, and the detail is as under:

Total	Details of I	TT Poles/Str	uctures	Details of 1	T Poles/Stri	uctures	Total *	Total
Number,	Total	HT Poles/	HT Poles/	Total,	LT Poles/	LT: Poles/	Number	Number
of HT/LT	Number -	Structures	Structures	Number	Structures	Structures	of HT/LT	of HT/LT
Poles/			to be		have		2007 N. 1351-76	Poles/
Structures	Poles/	Earthing	Earthed	Poles/	Earthing	Earthed	Structures	
	Structures			Structures			have 💮	to be
		er eje i ling					Earthing	Earthed
190,528	102,024	51,634	50,390	88,504	45,168	43,336	96,802	93,726

- 10. WHEREAS, a hearing/meeting on the matter was also held on October 04, 2022, wherein the representatives from all DISCOs including CEO SEPCO participated. During hearing/meeting, the Authority directed all DISCOs along with the Licensee to submit complete details of PCC Poles and steel structures with and without earthing/grounding. The Authority further directed the Licensee to submit a comprehensive plan of the execution of earthing/grounding of poles/structures along with concrete timelines. Moreover, the Authority desired that DISCOs should provide a mechanism on how they will efficiently perform the execution task within the minimum possible time. However the Licensee failed to do so; and
- 11. WHEREAS, vide NEPRA's letter dated October 28, 2022, the Licensee was again directed to submit the said information. In response, the Licensee vide its letter dated November 25, 2022, submitted its reply, wherein, the Licensee interalia, stated that it has deployed all Directorates of PD (Construction) to check the feeder/pole-wise status of earthing rods, either

installed or not installed. Accordingly, eighty-eight (88) feeders have been surveyed/completed by PD (Construction), and the remaining are under process. Additionally, the Licensee vide the said letter also committed that it is trying its best to complete 100% of the project job for the execution of earthing/grounding of poles/structures up to the end of 2023. In this regard, it is observed that since October 2022, the said survey has still not been completed by the Licensee, which depicts that the progress on Licensee's part is very poor. If the survey has not been completed despite the lapse of almost six months, then how the Licensee will execute earthing/grounding of 286,409 Nos. of HT/LT poles/structures by end of 2023? The Licensee's submitted plan seemed unrealistic and impractical which showed its non-seriousness towards execution of earthing on a war footing basis; and

- 12. WHEREAS, vide NEPRA's letter dated January 31, 2023, the Licensee was again directed to submit its revised plan in the light of observations highlighted by NEPRA. Meanwhile, Member (Technical), NEPRA during the visit of SEPCO on January 28, 2023, expressed serious concerns about the non-execution of earthing/grounding of poles/structures by the Licensee. In response, the Licensee vide its letter dated February 22, 2023, submitted that the available stock of earthing rods is 180 numbers only, and procurement of 10,000 earthing rods is under process. The availability of 180 earthing rods and procurement of only 10,000 rods as compared to 286,409 poles/structures again shows the Licensee's intentions towards inculcating a safety culture. Moreover, the Licensee has shown its inability to fast-track its procurement process by giving reasons that the suppliers are least interested to participate in material procurement due to the economical condition of the country. The argument put forward by the Licensee does not seem justified as it has not provided any detail that how many times it has tried to award contracts and in which newspapers, it published the same. Moreover, if the Licensee will award the contract in bulk rather than in a very small quantity i.e. 10,000, then potential bidders can participate and take risks as the contract will be of bigger size; and
- 13. WHEREAS, the Licensee vide its letter dated February 22, 2023, has submitted that it has completed a fresh survey and accordingly the revised figures of HT/LT unearthed structures are 174,995. The Licensee has further submitted that it is committing to complete the job by the end of 2024 upto the extent of structures only. However, the Licensee has not submitted any figures/numbers regarding PCC poles, which are required to be earthed too. The submission of the revised number of poles/structures by the Licensee shows that it has completed the survey after a lapse of five months. Whereas, the Licensee submitted in its earlier letter that it will execute earthing by the end of 2023. All these statements clearly indicate that the Licensee does not have any plan to execute this important task. The Licensee should have realized that operation of poles/structures without earthing/grounding in the field is highly dangerous and can lead to the occurrence of fatal accidents at any time. The Licensee is trying to mislead the Authority by hiding its inefficiencies; and





earthing/grounding has always been included in the awarded contracts of structures. However, the same is missing in the field at various places. In this regard, the Licensee is required to clarify its position regarding the missing earthing/grounding of structures despite the scope being included in the awarded contracts. A copy of the said report is attached herewith; and

- 15. WHEREAS, it is a matter of record that despite repeated and continuous correspondence, the Licensee has failed to produce any concrete plan indicating specific timelines for executing the earthing/grounding of HT/LT PCC poles & steel structures on a war footing basis. Hence, it can be said that the Licensee has, prima facia, violated Section 21(2)(f) of the NEPRA Act, Article 11 of the Distribution License read with Rule 4(g) of the NEPRA Performance Standards (Distribution) Rules, Clause 4 of Safety Requirements, Clause 4 of Design Code & Clause 1 of Protection Requirements of the Distribution Code and Clause 12.2 of Chapter 12 of the Consumer Service Manual; and"
- 10. WHEREAS, the Licensee was given fifteen (15) days to either admit or deny the occurrence of the said violations and submit a reply against the aforementioned Explanation, failing which it shall be presumed that the Licensee has nothing to say in its defense and the Authority shall proceed based on available record in accordance with NEPRA Act, Rules, and Regulations; and
- 11. WHEREAS, the Licensee submitted its response vide its letter dated June 27, 2023, against the Explanation served, and a hearing in the matter was also held on December 27, 2023. Consequently, the Authority, after detailed deliberations, concluded that the Licensee has failed to provide any satisfactory reply to the Explanation served to it; and"
- 12. WHEREAS, the Licensee has failed to satisfy the Authority with its replies and prima facia, has committed the violations of Section 21(2)(f) of the NEPRA Act, Article 11 of the Distribution License read with Rule 4(g) of the NEPRA Performance Standards (Distribution) Rules, 2005, Clause 4 of Safety Requirements, Clause 4 of Design Code & Clause 1 of Protection Requirements of the Distribution Code, 2005, and Clause 12.2 of Chapter 12 of the Consumer Service Manual, 2021. Therefore, the Authority hereby rejects the response of the Licensee against the Explanation served, and an Order dated March 20, 2024, is attached herewith, mentioning the reasons of rejection; and
- 15. The response of the Licensee against the SCN was not received within the stipulated time period. However, the Licensee, vide its letter dated November 13, 2024, submitted a progress report pertaining to the execution of earthing/grounding of its HT/LT steel structures. A summary of the same is as follows:

AUTHORITY

"The continuous work was carried out by teams of Project Director Construction SEPCO and made focus to accomplish the assigned targets, and accordingly following nos. of poles/structures have been provided earthing/grounding.

Total Surveyed	Total No. of HT	HT Str	uctures	Total No. of LT	LT Str	uctures	Grand	l Total
No. of	Structures	Earthed	To be	Structures	Earthed	To be	Earthed	To be
feeders			Earthed			Earthed		Earthed
369	118800	75549	43251	101200	64356	36844	139905	80095

The details of plan for execution of earthing/grounding for HT/LT Structures:

S #	Description	Total No. of Earthings
i	Remaining Structures to be earthed vide NEPRA's letter # 3467 dated 20.03.2024.	220,000
ii	Total No. of HT Structures earthed from 27 th Dec 2023 to 31 st Oct 2024 as Certificate has been provided by SE Operations Circles.	75549
iii	Total No. of LT Structures earthed from 27th Dec 2023 to 31st Oct 2024 as Certificate has been provided by SE Operations Circles.	64356

The details of plan for remaining earthing/grounding for HT/LT Structures:

S #	Description	Total No. of Earthings
i	Remaining HT/LT (Structures) to be earthed.	80,095
ii	HT/LT Structures to be earthed during Nov 2024 as 10,000 earth rods has been issued by MMM SEPCO to all Operation Circles.	10000
iii	Invitation for bid for procurement of 24,000 no. of earth rods has been published in National Newspaper on 21.10.2024.	24000

Net remaining 46,095 no. of HT/LT (Structures) to be earthed up to June 2025 through procurement of earth rods on a war footing basis."

Hearing

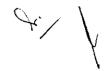
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16. In order to fulfill the requirement of law, the Authority decided to provide an opportunity for a hearing to the Licensee in light of Regulation 4(11) of NEPRA (Fine) Regulations, 2021, before finalizing the proceedings in the matter. Therefore, the hearing in the matter of SCN issued to the Licensee was held on May 14, 2025, wherein the CEO of the Licensee, along with his team, made the following submissions:

SEPCO, vide its letter dated 13.11.2024, submitted that the timeline to complete the remaining HT/LT Structures is June 2025.

In Nov-2025, only 46,095 number of HT/LT Structures were remaining for earthing, out of which 39,476 number of Structures have been earthed.

- iii. The remaining 6,619 number of Structures will be earthed by June 2025.
- 17. Meanwhile, the Licensee vide its letter dated May 14, 2025, also submitted its latest progress report pertaining to the subject matter. The salient points of the same are as follows:



"Details of earthed structures from 14.11.2024 to 13.05.2025

Name of Circle	Enclosure	No. of earthed structures	
Sukkur	Certificate has been provided	8250	
Ghotki	by SEs for installation of	7985	
Shikarpur	earthing/grounding from Nov	7959	
Larkana	2024 to 13 May 2025.	7528	
Dadu]	8054	
	Total		

Net Remaining 6,619 nos. of structures to be earthed up to ending June 2025 on a war footing basis."

Findings/Analysis:

- 18. The Licensee has not submitted its reply against the SCN served to it despite the lapse of considerable time period, which shows that the Licensee has taken this matter in a very casual manner. Being a distribution licensee, the Licensee is bound to submit the information as directed by the Authority; however, it has failed to do so.
- 19. Although the Licensee has submitted its progress reports vide above-referred letters, which also seems too slow as it has taken a total time duration of three years to complete the subject task, and even then, 6,619 number of structures are still remaining for earthing. It is a matter of record that NEPRA has been pursuing this matter since June 2022, repeatedly directing the Licensee to submit a concrete execution plan along with monthly progress reports. However, the Licensee's on-ground performance continues to reflect non-seriousness, inefficiency, and disregard for regulatory instructions. No evidence of accelerated or corrective action has been presented so far.
- 20. Moreover, it is a matter of grave concern that the Licensee has not completed the survey of HT/LT PCC poles, and still remains unable to determine the exact number of PCC poles that require earthing. This continued delay in even the identification stage reflects a clear lack of institutional capability and commitment to addressing this safety-critical requirement.
- 21. The Licensee's earlier explanation was rightly rejected due to the lack of satisfactory justification and negligible progress, and despite being given ample opportunity, no response was submitted by the Licensee against the Show Cause Notice. Moreover, the available record and the Licensee's own submissions clearly reflect continued violation of NEPRA laws, persistent non-compliance with the Authority's directives, and failure to address a serious and recurring safety hazard. Therefore, it is evident that the Licensee has failed to comply with the Authority's directives in a timely and effective manner, thereby violating the Performance Standards, Distribution Code, Power Safety Code, Consumer Service Manual, and other applicable regulatory documents.





22. Decision:

- i. After due deliberations and taking into account the submissions/arguments made by the Licensee during the hearing and in light of the NEPRA Act, NEPRA (Fine) Regulations, 2021, and other applicable documents, the Authority is of the considered opinion that the Licensee has failed to provide any satisfactory reply to the Show Cause Notice served to it, therefore, the Authority hereby decides to impose a fine amounting to PKR 10,000,000/- (Ten Million) on the Licensee due to its failure pertaining to 100% execution of earthing/grounding of its HT/LT poles/structures in its service territory. The Authority hereby further directs the Licensee to earth/ground all remaining (100%) steel structures within three months and PCC Poles within one year, failure to which proceedings with respect to per day fine on account of continued default will be initiated.
- ii. The Licensee is directed to pay the fine amount of PKR 10,000,000/- (Ten Million) in designated bank of the Authority within a period of 15 days from the date of issuance of this order and forward a copy of the paid instrument to the Registrar Office for information, failing which the Authority may recover the amount due under section 41 of the NEPRA Act as arrears of the land revenue or through any other appropriate legal means in addition to taking any other appropriate legal action against the Licensee for non-compliance.

AUTHORITY

Rafique Ahmed Shaikh Member (Technical)	2.18.
Amina Ahmed Member (Law)	annie ahmeed
Engr. Maqsood Anwar Khan Member (Development)	MATUREZ
Waseem Mukhtar Chairman	
NEPRA AUTHORITY	Dated 8th Aug, 2025