



**Registrar**

# **National Electric Power Regulatory Authority Islamic Republic of Pakistan**

NEPRA Tower, Attaturk Avenue (East), G-5/1, Islamabad.  
Tel: +92-51-9206500, Fax: +92-51-2600026  
Web: www.nepra.org.pk, E-mail: registrar@nepra.org.pk

No. NEPRA/DG(M&E)/LAD-04/ 14205

September 10, 2024

**Chief Executive Officer,**  
Faisalabad Electric Supply Company Ltd. (FESCO),  
Abdullahpur, Canal Bank Road,  
Faisalabad.

**SUBJECT: ORDER OF THE AUTHORITY IN THE MATTER OF SHOW CAUSE NOTICE  
ISSUED TO FESCO UNDER REGULATION 4(8) AND 4(9) 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

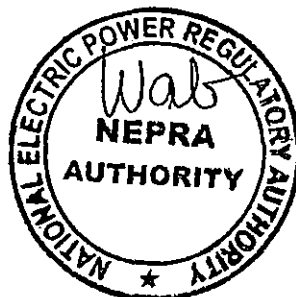
### IN THE MATTER OF SHOW CAUSE NOTICE ISSUED TO FESCO UNDER REGULATION 4(8) AND 4(9) OF NEPRA (FINE) REGULATIONS, 2021, ON ACCOUNT OF FAILURE TO EXECUTE EARTHING/GROUNDING OF HT/LT POLES/STRUCTURES IN ITS SERVICE TERRITORY.

1. Faisalabad Electric Supply Company Limited (FESCO) (the "Licensee") was granted a Distribution License (No. DL/02/2023) by the National Electric Power Regulatory Authority (the "Authority") on 09.05.2023, 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 (the "NEPRA Act").

#### Background:

2. During the investigation conducted by NEPRA with respect to fatal accidents in the service territories of DISCOs including the Licensee, it was revealed that one of the major causes of electrocutions is lack of earthing/grounding of poles/structures. The Authority while taking notice of such safety hazards, directed all the DISCOs including the Licensee vide letter dated June 07, 2022, followed by a reminder dated July 06, 2022, to submit the data pertaining to the total number of poles/structures, number of poles/structures installed in its service territory and number of poles/structures lacking earthing. Accordingly, the Licensee submitted the required information vide its email dated June 20, 2022.
3. 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 the 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 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.

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5. In addition to above, NEPRA Regional Office, Faisalabad, 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 28, 2022, submitted its response against the aforementioned directions & queries of the Authority. The Licensee submitted that the execution of earthing/grounding of remaining structures would be done by the end of the year December 2023. The details of HT/LT structures already earthed or to be earthed as submitted by the Licensee is as under:

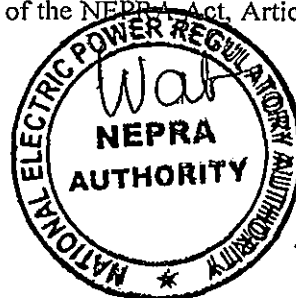
Total Number of HT/LT Structures	Details of HT Structures			Details of LT Structures			Total Number of HT/LT Structures have Earthing	Total Number of HT/LT Structures to be Earthed
	Total Number of HT Structures	HT Structures have Earthing	HT Structures to be Earthed	Total Number of LT Structures	LT Structures have Earthing	LT Structures to be Earthed		
190,528	102,024	51,634	50,390	88,504	45,168	43,336	96,802	93,726

7. In this regard, it was observed that the Licensee submitted a plan upto the extent of HT/LT structures only, and it did not submit anything about PCC poles. It is pertinent to highlight that the earlier submitted details by the Licensee also pertained to structures only. Though, the Licensee is committed to complete the earthing/grounding of structures by December 2023, however, it is reluctant to provide any detail with regard to the execution plan of PCC poles, which is equally important as structures.
8. It was further highlighted during the hearing dated October 04, 2023, the Licensee also misrepresented the figures before the Authority, as it was claiming that the provided numbers were of both PCC Poles and Steel Structures. However, at a later stage, it was revealed that the said numbers only pertained to steel structures. The Licensee has never provided any details of PCC Poles to the Authority despite repeated directions issued by the Authority.
9. Moreover, the Licensee did not share any progress regarding the execution of earthing/grounding of structures even though the Licensee was directed to submit monthly progress on a regular basis. All this clearly indicates that the Licensee does not have any plan to execute this important task and shows non-seriousness of the Licensee towards inculcating a safety culture in its service territory. 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.
10. Therefore, the Authority decided to initiate legal proceedings against the Licensee under 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

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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.

12. The Licensee vide its letter dated May 16, 2023, submitted its response. Furthermore, in order to satisfy the requirement of law, a public hearing in light of Regulation 4(5) of NEPRA (Fine) Regulations, 2021, was held on August 17, 2023, wherein, CEO of the Licensee along with his team participated and made submissions.

#### Show Cause Notice

13. 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 Show Cause Notice (SCN) to the Licensee under Regulation 4(8) & (9) of the NEPRA (Fine) Regulations, 2021 on account of violation of Performance Standards, Distribution Code, Power Safety Code, and other applicable documents.
14. Accordingly, NEPRA vide letter dated January 09, 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:

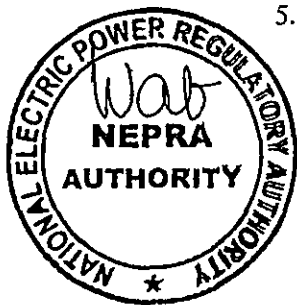
*"A distribution company shall ensure that its distribution facilities do not cause any leakage of electrical current or step potential beyond a level that can cause harm to human life, as laid down in the relevant IEEE/IEC Standards; prevent accessibility of live conductors or equipment; and prevent 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*



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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 Co-ordination 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 June 26, 2022, and the detail is as under:*

Total Number of HT/LT Poles/ Structures	Details of HT Poles/Structures			Details of LT Poles/Structures			Total Number of HT/LT Poles/ Structures have Earthing	Total Number of HT/LT Poles/ Structures to be Earthed
	Total Number of HT Poles/ Structures	HT Poles/ Structures have Earthing	HT Poles/ Structures to be Earthed	Total Number of LT Poles/ Structures	LT Poles/ Structures have Earthing	LT Poles/ Structures to be Earthed		
190,528	102,024	51,634	50,390	88,504	45,168	43,336	96,802	93,726

*The aforementioned data was reviewed and observed that the Licensee only submitted details of steel structures.*

10. **WHEREAS**, a hearing/meeting on the matter was also held on October 04, 2022, wherein the representatives from all DISCOs including CEO FESCO

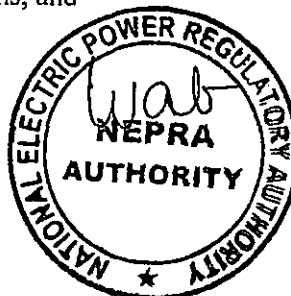
participated. During hearing/meeting, the Authority directed all DISCOs along with the Licensee to submit complete details of PCC Poles and steel structures with and without earthing/grounding. The Authority further directed the Licensee to submit a comprehensive plan of the execution of earthing/grounding 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 has 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 28, 2022, submitted its reply, wherein, the Licensee inter alia, stated that the execution of earthing/grounding of remaining structures would be done by end of the year December 2023. In this regard, it is observed that the Licensee submitted a plan upto the extent of HT/LT structures only, and it did not submit anything about PCC poles. It is pertinent to highlight that the earlier submitted details by the Licensee also pertained to structures only. Though, the Licensee is committed to complete the earthing/grounding of structures by December 2023, however, it is reluctant to provide any detail with regard to the execution plan of PCC poles, which is equally important as structures. It is further highlighted that during the hearing dated October 04, 2023, the Licensee also misrepresented the figures before the Authority, as it was claiming that the provided numbers were of both PCC Poles and Steel Structures. However, at later stage, it was revealed that the said numbers only pertained to steel structures. The Licensee has never provided any details of PCC Poles to the Authority despite repeated directions issued by the Authority. Moreover, the Licensee has not shared any progress regarding the execution of earthing/grounding of structures even though the Licensee was directed to submit monthly progress on regular basis. Hence it is unable to assess whether the Licensee will meet its deadline of December 2023, or otherwise. All this clearly indicates that the Licensee does not have any plan to execute this important task and shows non-seriousness of the Licensee towards inculcating a safety culture in its service territory. 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; and

12. **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 poles/structures on a war footing basis. Hence, it can be said that the Licensee has, prima facie, 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

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11. **WHEREAS**, the Licensee submitted its response vide its letters dated May 16, 2023, against the Explanations served, and a hearing in the matter was also held on August 17, 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, 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. Therefore, the Authority hereby rejects the response of the Licensee against the Explanation served, and an Order dated January 09, 2024, is attached herewith, mentioning the reasons of rejection; and”

15. In response, the Licensee vide its letter dated January 25, 2024, submitted its reply. The salient points of the same are as follows:

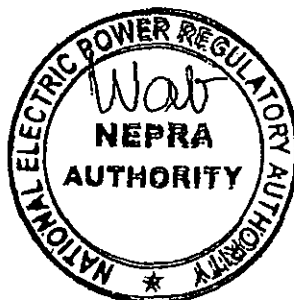
“At the very outset FESCO deems it proper to convey its gratitude to NEPRA towards appreciating the steps / efforts taken by it to promote the safety culture to minimize the fatal / non-fatal accidents of General Public by adopting the earthing's / groundings of HT / LT poles and distribution transformer sub stations. It has often been observed that failure of earthing of transformers and HT/LT structure / pole is the major cause of occurrence of fatal/non-fatal accidents. But by the grace of ALLAH Almighty, there is zero fatality/injuries of general public occurred owing to failure of grounding system in FESCO more than 4 years.

Initially FESCO would like to illustrate brief account of the efforts made and the steps taken to promote the safety culture towards employees and general public specifically by earthing/groundings of HT / LT poles and distribution transformer sub stations. FESCO is proactive, conscious and quite vigilant to cause any harm to human life, property and general public including its own employees. In this regard, FESCO is determined to maintain high standards of care to avoid any leakage of electrical current and safe working practices.

**Para wise reply to the Show Cause Notice:**

9. (a) In reply to the contents of this paragraph, it is submitted that FESCO is the first distribution licensee who conducted survey on the directions of NEPRA authority on war footing basis. Initially in the first step, pole to pole survey of steel structures was completed and same was shared in June, 2022, i.e.

Total Number of HT/LT Structures	Details of HT Structures			Details of LT Structures			Total Number of HT/LT Structures have Earthing	Total Number of HT/LT Structures to be Earthed
	Total Number of HT Structures	HT Structures have Earthing	HT Structures to be Earthed	Total Number of LT Structures	LT Structures have Earthing	LT Structures to be Earthed		
190,528	102,024	51,634	50,390	88,504	45,168	43,336	96,802	93,726



Up to date survey of HT/LT Structures ending December 2023, is as under:

Total Number of HT/LT Structures	Details of HT Structures			Details of LT Structures			Total Number of HT/LT Structures have Earthing	Total Number of HT/LT Structures to be Earthed
	Total Number of HT Structures	HT Structures have Earthing	HT Structures to be Earthed	Total Number of LT Structures	LT Structures have Earthing	LT Structures to be Earthed		
192,337	102,984	52,594	50,390	89,353	46,017	43,336	98,611	93,726

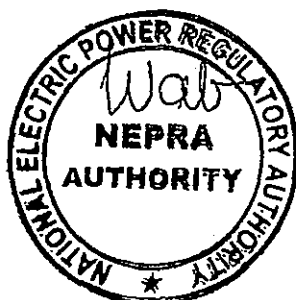
Up to ending December 2023, the progress of earthing of HT/LT structures is as under:

Remaining			Progress Upto 31.12.2023			%age Completion		
HT	LT	Sub Station	HT	LT	Sub Station	HT	LT	Sub Station
50,390	43,336	25,970	12,270	10,488	11,055	24.30%	24.20%	42.60%

Whereas the survey of HT/LT PC Poles is under process and will be completed up to February, 2024.

9. (b) Before the meeting held on 04-10 2022 at NEPRA, in reply to the contents of this paragraph it is submitted that FESCO on the directions of NEPRA authority formulated following road map for the earthing of distribution system.
  - i. FESCO put up the case before BOD and got approval for the purchase of material, execution of work and budget accordingly.
  - ii. FESCO then purchased the material, required for earthing and ensured its availability at all field stores of FESCO.
  - iii. Afterward, all the Divisions under FESCO floated the tenders and work orders have been awarded to the contractors and started physical work at site. And FESCO completed earthing up to ending December 2023 of about 24% of HT/LT structures, whereas progress of substations is 42%.
  - iv. Admitted that timeline for HT/LT structures earthing committed upto ending December 2023 by FESCO but as far as slow pace of progress regarding earthing is concerned, the following constraints were observed,
    1. Budget arrangements.
    2. Lack of healthy competition of contractors.
    3. Bad weather conditions.
    4. Acute Shortage of staff
  - v. FESCO has got approval of amount 600 Million for FY-2023-24 from BOD in its 274<sup>th</sup>/24<sup>th</sup> meeting held on dated 27-11-2023 and the same was further allocated to all circles. All the Circles under FESCO floated the tenders and work orders have been awarded to the contractors (List enclosed) and physical work progress is being monitored vigorously.

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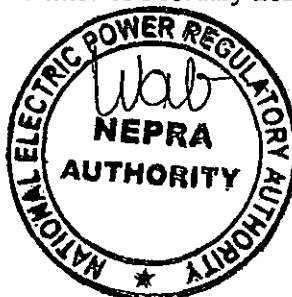
9. (c) (i) In reply to the contents of this paragraph it is submitted that FESCO in addition to his reply submitted vide letter dated November 28, 2022 humbly mentioned that:
- "FESCO has completed the survey of HT/LT structures on war footing basis whereas survey of HT/LT PC Poles/PC Spun Hollow Poles at the sub divisional level 70% completed and remaining survey will be completed up to ending February 2024"**
9. (d) The earthing of HT/LT structures will be completed up to ending 06-2024, whereas, earthing of HT/LT PC Poles will be started after establishment of proper mechanism and detailed study in the light of approved NTDC specifications which is still awaited.
12. The para as stated does not seems to be correct whereas FESCO has already submitted concrete plan showing specific timelines for executing earthing/groundings of HT/LT poles/structures on emergent basis. Moreover, it will be mentionable that FESCO is a law-abiding company and can never even think of violating any provisions of NEPRA Laws."
16. In order to fulfill the requirement of law, the Authority decided to provide an opportunity of 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 13, 2024, wherein, CEO FESCO along with his team, made the following submissions:
- Currently, FESCO has completed 46% earthing/grounding of HT/LT structures and will achieve the remaining 60% target by June 2024. Whereas, the remaining 40% work will be completed by September 2024;
  - In addition to that, the proper earthing/grounding requires a deep boring in the soil to get the desired results of resistance, that's why, it is taking time therefore, we are requesting NEPRA to extend some time period so that quality of work could be done in letter & spirit.

**Findings/Analysis:**

17. The Licensee has submitted that it is the first distribution licensee who conducted survey on the directions of the NEPRA Authority on war footing basis. Initially, in the first step, pole to pole survey of steel structures was completed and the same was shared in June 2022. The survey of HT/LT PC Poles is under process and will be completed up to February 2024.

The Authority has considered the submissions of the Licensee and observes that the Licensee has started to carry out the task after the direction of NEPRA. However, the Licensee being a distribution licensee should have initiated such efforts a lot earlier which it failed to do. NEPRA has taken up this matter since June 2022 and repeatedly directed the Licensee to submit a concrete plan and subsequently provide monthly progress reports. However, no single progress report has yet been submitted by the Licensee which again shows that it has not earthed any single pole/structure despite the lapse of more than one year. Moreover, as far as the survey of PCC poles is concerned, the Licensee has not yet completed despite the committed timelines of February 2024 which show its seriousness

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towards inculcating safety culture in its territory. Hence it appears that the submissions of the Licensee are only on paper but not on the ground.

18. The Licensee has submitted that it has put up the case before BOD and got approval for the purchase of material, execution of work, and budget accordingly. The Licensee then purchased the material, required for earthing and ensured its availability at all field stores of the Licensee. Afterward, all the Divisions under the Licensee floated the tenders, and work orders were awarded to the contractors and started physical work at the sites. The Licensee has further submitted that it has completed earthing up to ending December 2023 of about 24% of HT/LT structures, whereas progress of substations is 42%. In addition to the above, the Licensee has submitted that the timeline of December 2023, for earthing of HT/LT structures could not be met due to budget arrangements, lack of healthy competition of contractors, bad weather conditions, and acute Shortage of staff.

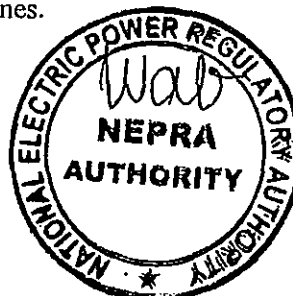
The Authority after examining the submissions of the Licensee observes that the execution progress of the task is far behind its committed timelines which depicts the Licensee's willingness and commitment towards removal of this severe safety hazard. Moreover, the Licensee has highlighted the reasons behind its slow progress such as budget arrangements, lack of healthy competition of contractors, bad weather conditions, and acute Shortage of staff, however, these factors seem invalid and could not absolve the Licensee from its responsibility to complete the task in a timely manner. It is a matter of record that five fatalities of its employees occurred in FY-2020-21, six fatalities (3 Employees and 3 Public) occurred in FY 2021-22, and four fatalities (2 Employees and 2 Public) occurred from July 2023 onwards. This reveals that the Licensee has failed to rectify serious safety hazards, which caused the leakage current & harm to human life, and subsequently inculcation of a Safety culture in its territory. Moreover, to effectively address this public safety issue, a more comprehensive and demonstrably accelerated plan is required from the Licensee, however, it failed to do submit the same.

19. As far as earthing of PCC poles is concerned, the Licensee has requested NEPRA to arrange a suitable meeting in order to formulate a strategy for their earthing. In this regard, it is clarified that NEPRA has already conducted a meeting with the Licensee, wherein, the earthing design of PCC poles was discussed. Later on, the Licensee had taken up the matter with NTDC, and accordingly, NTDC clearly communicated the SOP/design of earthing of PCC poles to the Licensee. Now, the request for another meeting by the Licensee is beyond understanding, and seems that the Licensee is applying delaying tactics which is highly unjustifiable as already considerable time has been lapsed.

20. **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 comply with the directions of the Authority may lead towards further penalty on the Licensee which will be decided after the completion of specified timelines.

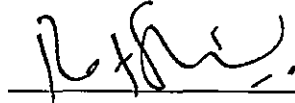
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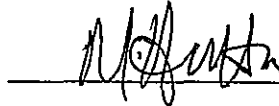
- ii. The Licensee is directed to pay the fine amount of PKR 10,000,000/- (Ten Million) in designated bank of the Authority within a period of 15 days from the date of issuance of this order and forward a copy of the paid instrument to the Registrar Office for information, failing which the Authority 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)



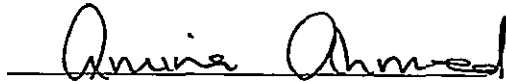
Engr. Maqsood Anwar Khan  
Member (Licensing)




Mathar Niaz Rana (nsc)  
Member (Tariff & Finance)

ON LEAVE

Amina Ahmed  
Member (Law)



Waseem Mukhtar  
Chairman



Dated 10th SEPT 2024

