

National Electric Power Regulatory Authority
ISLAMIC REPUBLIC OF PAKISTAN
NEPRA Head Office
Attaturk Avenue (East) Sector G-5/1, Islamabad.
Ph:051-2013200, Fax: 051-2600021

Consumer Affairs
Department

5318
TCD 09/-2025
December 3, 2025

Chief Executive Officer,
K-Electric Limited, KE House No 39-B,
Sunset Boulevard Phase-II, Defence Housing Authority,
Karachi.

Subject: **DECISION IN THE MATTER OF REVIEW MOTION FILED BY K-ELECTRIC LIMITED AGAINST THE DECISION OF NEPRA REGARDING COMPLAINT FILED BY DR. MUHAMMAD RIZWAN BAIG UNDER SECTION 39 OF THE REGULATION OF GENERATION, TRANSMISSION AND DISTRIBUTION OF ELECTRIC POWER ACT, 1997 AGAINST K-ELECTRIC LIMITED REGARDING NET-METERING (AL0667567).**

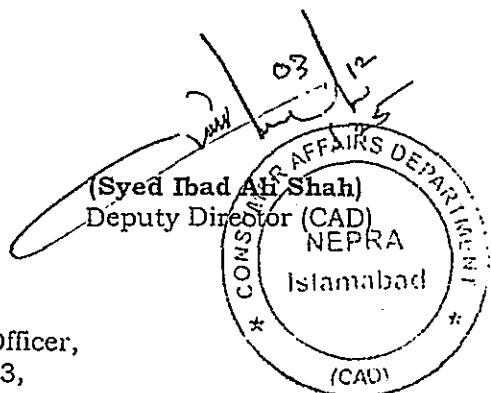
KElectric-KHI-31350-11-23

Please find enclosed herewith the decision of NEPRA Complaints Resolution Committee (CRC) dated December 03, 2025, regarding the subject matter for necessary action and compliance.

Encl: As above

Copy to:

1. Mr. M. Imran Hussain Qureshi
Chief Regulatory Affairs Officer & Govt. Relations Officer,
K-Electric Limited Office, 56 A, Street No. 88, G-6/3,
Islamabad.
2. Mr. Abid Hussain, Advisor,
NEPRA Regional Office, Plot No. 15/118,
Office No. 706, 7th Floor, Balad Trade Centre,
Alamgir Road, B.M.C.H.S. Block No. 3,
Bahadurabad, Karachi.
3. Mr. Muhammad Rizwan Baig,
Babar Hospital, 1st Floor, Habibi Chamber, Block 14,
Gulshan-e-Iqbal, Main University Road,
Civic Center, Karachi.
0333-2146024





BEFORE THE
NATIONAL ELECTRIC POWER REGULATORY AUTHORITY
(NEPRA)
REVIEW MOTION FILED BY K-ELECTRIC IN
Complaint No. KElectric-KHI-31350-11-23

K-Electric Limited (KE) Petitioner
KE House No.39B, Sunset Boulevard
Defence Housing Authority, Karachi.

Versus

Dr. Muhammad Rizwan Baig, Complainant
Babar Hospital, 1st Floor, Habibi Chamber, Block 14,
Gulshan-e-Iqbal, Main University Road,
Near Civic Centre, Karachi
Cell: 0333-2146024

Date of Hearing(s): November 11, 2025

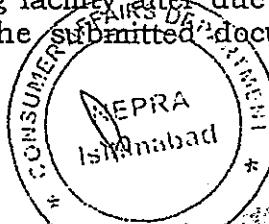
On behalf of
Complainant: Dr. Muhammad Rizwan Baig
Petitioner: Mr. Asif Shajar, KE

Subject: DECISION IN THE MATTER OF REVIEW MOTION FILED BY K-ELECTRIC LIMITED AGAINST THE DECISION OF NEPRA REGARDING COMPLAINT FILED BY DR. MUHAMMAD RIZWAN BAIG UNDER SECTION 39 OF THE REGULATION OF GENERATION, TRANSMISSION AND DISTRIBUTION OF ELECTRIC POWER ACT, 1997 AGAINST K-ELECTRIC LIMITED REGARDING NET-METERING (AL0667567)

DECISION

This decision shall dispose of the motion for leave for review filed by K-Electric Limited (hereinafter referred to as the "KE" or "Petitioner") against the decision of NEPRA Complaints Resolution Committee dated July 30, 2024 in the matter of complaint of Mr. Muhammad Rizwan Baig, Babar Hospital, 1st Floor, Habibi Chamber, Block 14, Gulshan-e-Iqbal, Main University Road, Near Civic Centre, Karachi, Karachi. (hereinafter referred to as "the Complainant") against K-Electric Limited, under Section 39 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (hereinafter referred to as the "NEPRA Act").

2. Brief facts of the case are that the Complainant in the complaint submitted that a 20 kW solar power system was installed for Babar Hospital, main University Road, Karachi on roof of Habib Chamber. The Complainant applied to K-Electric for net-metering connection, however, KE has not yet provided net-metering facility. The Complainant requested for redressal of the grievances and issuance of directions to KE for refund of bills charged by KE on account of non-usage of solar system and requested for installation of net-metering connection besides compensation by KE due to delay in giving permission of net-metering. The matter was taken up with KE. In response, KE submitted that the Complainant is the lessee/occupant of a General Hospital and Maternity Home (Babar Hospital) on the first floor of a multi-storey commercial building (Habib Chambers) and has applied for net-metering facility after due submission of required documents. However, upon scrutiny of the submitted documents it was



revealed that the Complainant does not possess the ownership of the location (i.e. roof top of the building in question) where the DG facility / solar network has been installed. Hence, the Complainant is requested to provide a sub-lease of the roof-top depicting ownership of the roof-top so that the application for provision of net-metering can be further processed. The report of KE was sent to the Complainant for information. In response, the Complainant raised observations over the report of KE and submitted that the Hospital possesses 11000 square feet area of roof of the said building, therefore, the point of view of KE is baseless. In order to proceed further into the matter, a hearing was held on January 23, 2024 at NEPRA Regional Office, Karachi wherein both the parties participated and advanced their arguments. Accordingly, in light of the available record, verbal arguments, and relevant laws, the matter was decided and KE was directed to provide net-metering connection to the Complainant after completion of all the codal formalities and subject to verification of NOC issued by the Management of Habib Chambers and allotment of 11000 square feet of the roof-top.

3. Being aggrieved with the decision of Complaints Resolution Committee (NEPRA), KE filed a motion for leave for review. KE in its review inter-alia submitted as under:

- i. The Complainant, Dr. Rizwan Baig, did not provide proof that he was authorized by the registered consumer (Ms. Zaitoon Nisa) to file the complaint.
- ii. The Complainant only owns the first floor of the building and has no ownership of the rooftop where the solar system is installed.
- iii. NOC from the Management of Habib Chambers is insufficient because supporting documents such as registration of the association, member list, and authority to sign contracts were not provided. KE also argued that the allotment letter from M/s Howkana Construction creates confusion about who actually owns the rooftop.
- iv. Proof of ownership of the rooftop is mandatory under Clause 2.3.1 of the NEPRA Consumer Service Manual and therefore the application could not be processed without it.
- v. Installing the solar system on the rooftop and using it on the first floor requires passing wires through common areas of a multi-storey building, would amount to "distribution," a licensed activity under Section 20 of the NEPRA Act.
- vi. NEPRA decision relied on insufficient evidence and did not adequately evaluate the ownership inconsistencies.

4. The motion for leave for review filed by KE was considered and accordingly, a hearing was held at NEPRA Regional Office, Karachi which was attended by both the parties. The case has been examined in detail in light of the record made so available by the parties, arguments advanced during the hearing and applicable law. KE in its review motion has not submitted any new ground. The motion for leave for review is disposed of on the following terms:

- i. The case has been analyzed in detail. KE did not present any new facts or evidence. The review only repeated earlier objections already addressed in the original decision.
- ii. The Management of Habib Chambers issued a valid NOC and formally allotted 11,000 sq. ft. of rooftop space to Babar Hospital. This establishes lawful possession and authorization for installing the solar system. Therefore, the Complainant is entitled for provision of net-metering connection in accordance with NEPRA (Alternative & Renewable Energy) Distributed Generation and Net Metering Regulations, 2015. Further, NEPRA Consumer Eligibility Criteria (Distribution Licensees) Regulations, 2022 provides that "a distribution licensee



shall ensure that all applicants and consumers are treated in a non-discriminatory, fair, transparent and just manner."

- iii. Under the NEPRA Distributed Generation & Net Metering Regulations, 2015, eligibility is not limited to owners; it includes owners, co-owners, lessees, tenants, and others. Thus, KE's insistence on rooftop ownership is inconsistent with the Regulations; it applies only to obtaining new electricity connections, not to net-metering for an existing connection. The consumer already has an active commercial connection.
- iv. Further, KE's contention regarding the requirement of a distribution license is not valid. The solar system is located on private property duly allotted to the Hospital, and electricity is intended solely for its own use. Under Section 2(v) of the NEPRA Act, this does not constitute "distribution" and does not require any license. No supply is being distributed to any other co-owner or third party. The activity therefore falls within the statutory exception and does not attract any distribution-licensing requirement. Moreover, all the cables, wire, equipment for supply of electric power from the solar installation to the consumer is designed in isolation with the electrical network of the main building.

v. The Complaint Resolution Committee correctly applied the law and facts. No error apparent on the record was shown. Therefore, the review does not meet the criteria under the NEPRA Review Procedure Regulations, 2009.

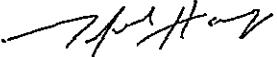
- vi. Additionally, under Regulation 3(2) of the NEPRA Review Procedure Regulations, 2009, a review may only be entertained where there is new and important evidence, an error apparent on the face of the record, or other sufficient cause. Regulation 3(7) further provides that leave for review may be refused where it would not result in withdrawal or modification of the order. As the Complaint Resolution Committee correctly appreciated the facts and applicable law, and as no new evidence or error has been established, KE's review motion is not maintainable and is liable to be refused.
- vii. In view of the foregoing, the Consumer's rooftop solar installation does not constitute "distribution," the Consumer fully meets the eligibility criteria for net-metering, and the review sought by KE against the Order of the Complaint Resolution Committee dated July 03, 2024 is not sustainable under the NEPRA Review Procedure Regulations, 2009.

5. Foregoing in view, KE is directed to provide net-metering connection to the Complainant after completion of all the codal formalities and subject to verification of NOC issued by the Management of Habib Chambers and allotment of 11000 square feet of the roof-top. The case is disposed of in the above terms.



(Lashkar Khan Qambrani)

Member, Complaints Resolution Committee/ Member, Complaints Resolution Committee/
Director (CAD) Assistant Legal Advisor (CAD)



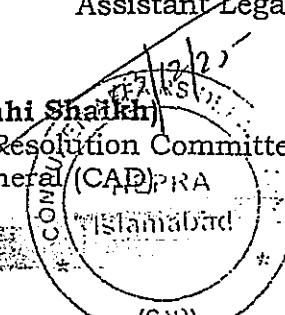
(Muhammad Irfan ul Haq)

Member, Complaints Resolution Committee/
Assistant Legal Advisor (CAD)



(Naweed Illahi Shaikh)

Convener, Complaints Resolution Committee/
Director General (CAD) PRA



PAKISTAN REGULATORY AUTHORITY
ISLAMABAD
(CAD)

Islamabad, December 03, 2025