

National Electric Power Regulatory Authority

ISLAMIC REPUBLIC OF PAKISTAN Attaturk Avenue (East) Sector G-5/1, Islamabad.

Ph: 051-2013200 Fax: 051-2600021

Consumer Affairs Department

August 27, 2025

Chief Executive Officer. Lahore Electric Supply Company (LESCO), 22-A, Queen's Road, Lahore.

SUBJECT: DECISION IN THE MATTER OF COMPLAINT FILED BY DIRECTOR (ELECTRICAL), CHIEF ENGINEER BRANCH, DEFENCE HOUSING AUTHORITY (DHA), LAHORE, UNDER SECTION REGULATION OF GENERATION, TRANSMISSION AND DISTRIBUTION OF ELECTRIC POWER ACT, 1997 AGAINST LESCO REGARDING INSTALLTION OF 1 X 20/26 MVA POWER TRANSFORMER AT GIS GRID STATION DHA PHASE-XII (EME).

Complaint No. **LESCO-NHQ-21666-05-23**

Please find enclosed herewith the decision of the NEPRA Complaints Resolution Committee (CRC), dated August 27, 2025 regarding the subject matter for necessary action and compliance.

Encl: As above

Copy to:

1. C.E/Customer Services Director LESCO, 22-A, Canal Bank Road, Faisalabad.

2. Incharge Complaint Cell LESCO, Focal Person to NEPRA, LESCO, 22-A, Queen's Road, Lahore.

3. Assistant Director (NEPRA), 54-B, Link Arcade, GECH Society, Phase 3, Link Road, Model Town, Lahore.

4. Director (Electrical), Chief Engineer Branch, Defence Housing Authority (DHA), Main Office Complex, Sector A, Commercial Area, Phase-VI, Lahore. Cell # <u>042-111342547</u>

Assistant Director (CAD)

NEPRA Islamabad

(CAD)



NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (NEPRA)

Complaint No. LESCO-NHQ-21666-05-23

Director (Electrical) Defence Housing Authority (DHA) Main Office Complex, Sector-A, Commercial Area Phase-VI, Lahore.

......Complainant

Versus

Lahore Electric Supply Company (LESCO)

...... Respondent

22-A, Queens Road, Lahore.

Date of Hearing:

August 19, 2023

September 13, 2023

On behalf of:

Mr. Tariq Rehman Jahangir, Director (Electrical), DHA

Complainant:

Ch. Muhammad Nacem, Power Consultant, SDO (Electrical), DHA

Mr. Amir Munir, APE (Electrical), DHA

Respondent:

Mr. Khurram Atta, DDT (GSO), LESCO

Mr. Naeem Qasim, Addl. Manager, LESCO

Subject:

DECISION IN THE MATTER OF COMPLAINT FILED BY DIRECTOR (ELECTRICAL), CHIEF ENGINEER BRANCH, DEFENCE HOUSING AUTHORITY (DHA), LAHORE, UNDER SECTION 39 OF THE REGULATION OF GENERATION, TRANSMISSION AND DISTRIBUTION OF ELECTRIC POWER ACT, 1997 AGAINST LESCO REGARDING INSTALLATION OF 1 X 20/26 MVA POWER TRANSFORMER AT GIS GRID STATION DHA PHASE-XII (EME).

DECISION

This decision shall dispose of the complaint filed by Director (Electrical), Chief Engineer Branch, Defence Housing Authority (DHA) (hereinafter referred to as "the Complainant") against Lahore Electric Supply Company Limited (hereinafter referred to as the "Respondent" or "LESCO"), under Section 39 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (hereinafter referred to as the "NEPRA Act").

- 2. The Complainant has submitted as under:
 - i. DHA EME Society, Phase-XII, Lahore, consists of more than 3000 residential/ commercial consumers and the complete society is being fed through independent 132 kV GIS Grid Station located at DHA Phase-XII where only 1 x 20/26MVA power transformer is installed. Being one point supply system, LESCO is responsible for O&M of subject grid station, whereas, the internal distribution network i.e. billing, O&M and continuity of supply etc. is the responsibility of DHA EME.
 - ii. DHA requested LESCO to grant permission for installation of additional 1 x 20/26 MVA Power Transformer at its 132 kV GIS Grid Station to counter any

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emergent situation. In response, LESCO asked the Complainant to approach NEPRA for their consent/permission on the said issue.

- iii.As per the approved design of 132 kV GIS Grid Station, an additional transformer Bay is already installed at GIS to encounter the N-1 Contingency. Furthermore, metering is being carried out by LESCO on 132 kV level and there is no chance of any pilferage or consumption beyond sanctioned load i.e. 15 MW while during summer season, maximum load recorded was 9 MW
- iv. In view of above, the Complainant has requested for permission for installation of an additional $1 \times 20/26$ MVA Power Transformer on cost deposit basis.
- 3. The issue was taken up with LESCO. In response, LESCO submitted as under:
 - i. The connection for load of 4000 KW under C-2 tariff was approved by competent authority through independent 11 KV feeder from 132 KV Chung Grid Station during 1995. Later, the management of DHA EME submitted revised design of external electrification during March 2010 with transition from one point supply to individual metering for ultimate load demand of 328427 kW through proposed 08 No. 11 kV feeders emanating from 132 KV DHA EME Grid Station which was also approved dated April 03, 2012 by LESCO.
 - ii. On September, 2014, DHA EME requested to retain one point supply under bulk supply tariff and requested for extension of load from 4000 KW to 15000 KW. The case of extension of load from 4 MW to 15 MW was processed and 1 x 20/26 MVA Power Transformer along with its Bay and other metering arrangement was approved for extension of load during May, 2016. NEPRA issued Distribution License to DHA EME during December, 2016.
 - iii. The 132 KV Grid Station DHA EME at one point supply was energized in August, 2021 as per approved design. Later, the Complainant requested for installation of 1x20/26 MVA Transformer under N-1 Contingency to counter any adverse situation in case of emergency while the same was regretted by LESCO on the pretext of already approved load commensurate with the appropriate capacity of power transformer with the exception that DHA EME may install 02x10/13 MVA Power Transformers instead of 01 No. additional 20/26 MVA Power Transformer to meet emergent situation.
- 4. In order to analyze the matter, hearings were held at NEPRA Regional Office, Lahore and Head Office, Islamabad, wherein the Complainant and LESCO officials duly participated and reiterated the previous arguments.
 - i. DHA Phase-XII EME approached LESCO for extension of existing load to a total of 15 MW for its bulk supply connection under C-III tariff located off Canal Road, Lahore In response, the application was approved by LESCO during the year 2016 against which an independent 132 kV EME GIS Grid Station comprising of (1) No. of 20/26 MVA transformer bay was constructed by the Complainant. Eventually, the connection was energized during the year 2021 by LESCO through standalone 20/26 MVA power transformer
 - ii. Later, the Complainant approached LESCO for technical approval for the installation of a standby 20/26 MVA power transformer at another bay with the similar scheme of arrangement, however denied by LESCO on the pretext of absence of any relevant policy or SOPs. The standby transformer was only to be utilized in emergent conditions as a replacement to provide continuity of electricity supply in order to safeguard right of its consumers.

The clause 3.2.2 (a) of Transmission Planning Criteria and Standards of Grid Code (TPCS), 2023 clearly states that single contingency (N-1) involves the

Decision - Director (Elec.), Chief Engineer Branch, Defence Housing Authority-DHA (LESCEPNHQ-2)

loss of 'Single transmission element' i.e. a transformer etc. while 'No loss of load' is allowed under such contingent conditions of transmission system. It is pertinent to mention here that under the same modalities of Grid Code, the system should be transiently & dynamically stable under single contingency.

- Furthermore, the administrative approval was accorded by LESCO in the iv. instant matter with a condition that, 'DHA Phase-XII EME will be bound to follow the load management instructions issued by PEPCO/LESCO.' Thus, the Complainant is forced not to use supply during the fault conditions arising out of any unfavorable situation.
- Hence, the administrative approval reflects that LESCO has implemented the N-1 contingency policy of Grid Code in its network arrangement. Accordingly, the Complainant could also be allowed to contribute in the implementation of Grid Code by avoiding loss of load in emergent situation after installation of a standby 20/26 MVA power transformer. Moreover, Grid Code does not expressly prohibit installation of standby power transformer thus providing logical reasoning and flexibility in supplying uninterruptable electricity at the Complainant's society
- It is pertinent to mention here that the metering of Complainant's connection is being performed on 132 kV level by LESCO and while doing so in presence of standby power transformer, no extra transformation losses shall be borne by LESCO. Hence, depriving the Complainant of reliable electricity supply in terms of disallowing standby transformer without any clear prohibition in the regulatory framework is not warranted. Furthermore, in order to prevent any misuse of electricity due to anticipated standby transformer, LESCO being a distribution licensee must be cognizant of any technical/financial constraint which may arise after installation of standby power transformer as requested. Moreover, NTDC has already approved an additional power transformer at 220kV Bahria Town (Pvt.) Ltd. grid stations, Islamabad/ Rawalpindi.

Foregoing in view, LESCO is directed to approve the installation of another 20/26 MVA power transformer after completion of all the codel formalities and obtaining an undertaking from the Complainant to the effect that the sanctioned load should not be violated and transformer shall be operated only in emergency situation for the continuity of electricity supply. The Complaint is disposed of in above terms.

(Lashkar Khan Qambrani)

Member, Complaints Resolution Committee/

Director (CAD)

TheHog (Muhammad Irfan ul Haq)

Member, Complaints Resolution Committee/

Assistant Legal Advisor (CAD)

(Naweed Villahil Shaikh) Convener, Complaints Resolution Committee

Director General (CAD)

Islamabad, August 27, 2025

NEPRA Islamabad

(CAD)