



National Electric Power Regulatory Authority

ISLAMIC REPUBLIC OF PAKISTAN

NEPRA Head Office

Ataturk Avenue (East) Sector G-5/1, Islamabad.

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Consumer Affairs
Department

TCD 05/

5135

-2025

November 24, 2025

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

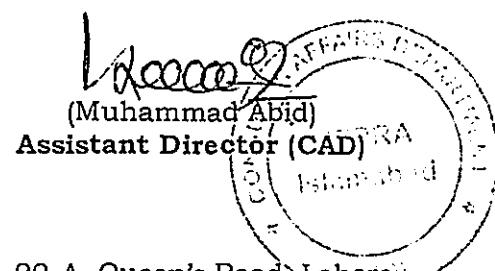
Subject: DECISION IN THE MATTER OF COMPLAINT FILED BY MR. SALEEM AKHTAR, M/S MOIZ TEXTILE MILLS LIMITED, THROUGH COUNSEL MR. KHALIL-UR-REHMAN ADVOCATE HIGH COURT, UNDER SECTION 39 OF THE REGULATION OF GENERATION, TRANSMISSION AND DISTRIBUTION OF ELECTRIC POWER ACT, 1997 AGAINST LESCO REGARDING DETECTION BILL (A/C# 24 11919 9063000)

Complaint No. LESCO-NHQ-33044-01-24 & LESCO-NHO-59886-08-25

Please find enclosed herewith decision of the NEPRA Complaints Resolution Committee (CRC) dated November 24, 2025 for necessary action.

Copy to:

1. Chief Engineer/Customer Services Director, LESCO, 22-A, Queen's Road, Lahore.
2. Director (Commercial), LESCO, 22-A, Queen's Road, Lahore.
3. Incharge Central Complaint Cell, LESCO & Focal Person to NEPRA, LESCO, 22-A, Queens Road, Lahore. 042-99204859
4. XEN (Ops), Model Industrial Division LESCO, Lahore.
5. Mr. Khalil-ur-Rehman Advocate High Court, SKB Law Associates, 3rd Floor, Hameed Law Chambers, Near Al-Taj Hotel, 1-Turner Road, Lahore. 0321-4457240
6. Mr. Saleem Akhtar, M/s Moiz Textile Mills Limited, 35 KM, Raiwind Road, Lahore.





BEFORE THE
NATIONAL ELECTRIC POWER REGULATORY AUTHORITY
(NEPRA)

Complaint No. LESCO-NHQ-33044-01-24 & LESCO-NHQ-59886-08-25

Mr. Saleem Akhtar,
M/s Moiz Textile Mills Limited,
35 KM, Raiwind Road, Lahore. Complainant

VERSUS

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

Date of Hearing: November 28, 2024
December 16, 2024
January 21, 2025
April 24, 2025
May 27, 2025
July 08, 2025
July 30, 2025
August 20, 2025
October 02, 2025

On Behalf of
Complainant: Mr. Mr. Kalil Ur Rehman (Legal Counsel)
Mr. Noraiz Ismail Gondal (Advocate)
Mr. Mr. Zain Ul Abideen (Legal Counsel)

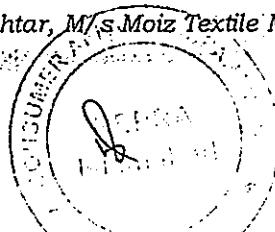
Respondent: Mr. Sana Muhammad, XEN - LESCO
Mr. Fayyaz Hussain, XEN - LESCO

Subject: DECISION IN THE MATTER OF COMPLAINT FILED BY MR. SALEEM AKHTAR, M/S MOIZ TEXTILE MILLS LIMITED, THROUGH COUNSEL MR. KHALIL-UR-REHMAN ADVOCATE HIGH COURT, UNDER SECTION 39 OF THE REGULATION OF GENERATION, TRANSMISSION AND DISTRIBUTION OF ELECTRIC POWER ACT, 1997 AGAINST LESCO REGARDING DETECTION BILL (A/C# 24 11919 9063000)

DECISION

This decision shall dispose of the complaint filed by Mr. Saleem Akhtar, M/s Moiz Textile Mills through Mr. Khalil-ur-Rehman, Advocate hereinafter referred to as the "Complainant" before NEPRA 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").

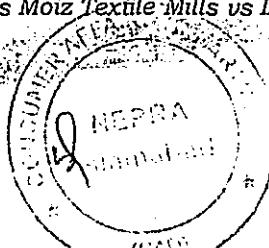
2. Brief facts of the case are that the Complainant in the complaint submitted that subsequent upon approval of extension of load by LESCO from 3000 kW to 6800 kW, LESCO has over charged amount in the bill issued for the month of December, 2023 on account of difference of Grid end meter and meter at the premises for the period from June, 2023 to November, 2023 and requested NEPRA to direct LESCO for withdrawal of the same being in violation of relevant provisions of Consumer Service Manual (CSM).



3. The matter was taken up with LESCO whereby LESCO submitted that M/s Moiz Textile Mills applied for extension of load from 3000 kW to 6800 kW which was approved by LESCO on April 11, 2023. Further, according to the applicable document while allowing extension of load from 5-MW to 7.5-MW, the DISCOs are to ensure that no additional line losses are incurred and additional loss if any shall be borne by the respective consumer. Therefore, billing of the consumer was shifted at 11 KV Grid end Panel to avoid line losses and consumer has been charged difference of reading between the grid end meter reading and consumer end meter only and no overbilling has been charged to the Complainant.

4. In order to proceed further hearings were held at NEPRA Head Office, Islamabad which were attended by both the parties wherein case was discussed in detail. The case has been analyzed in the light of arguments advanced by the parties, documents placed on record and applicable law. The following has been observed:

- (i) The Complainant is an industrial consumer of LESCO under reference No. 24 11919 9063000 getting supply from LESCO with dedicated feeder under B-3 tariff category. The Complainant applied to LESCO for extension of load from 3000 kW to 6800 kW which was approved by LESCO on April 11, 2023. Initially the Complainant agitated charging of arrears amounting to Rs. 3,554,197.56 for the period from June, 2023 to November, 2023 on account of difference of reading between the grid end meter reading and consumer end meter reading in the bill issued for the month of November, 2023. LESCO further charged arrears/bill adjustment amounting to Rs. 6,305,345.47 and Rs. 2,491,752/- in the bills issued for the months of July, 2025 and September, 2025 respectively for which the Complainant filed Writ Petitions before Lahore High Court, Lahore vide WP No. 47590 of 2025 and WP No. 4362 of 2025 whereby the honourable court directed NEPRA to decide the pending complaint within period of thirty (30) days.
- (ii) Prior to extension of load LESCO was carrying out billing at consumer end meter (installed at premises), however, after extension of load LESCO started meter reading at grid end meter likewise other consumers having load more than 5-MW i.e. B-4 consumers with independent grid stations. When meter reading is carried out at grid end meter, line losses between grid and consumer premises shift to the consumers whereas in the case of B-3 consumers where billing is carried out at feeder such loss does not pass on to the consumer. According to the applicable document regarding allowing extension of load between 5-MW to 7.5-MW; DISCOs are to ensure that no additional line losses are incurred and additional loss if any are to be borne by the respective consumer means that consumer is liable for payment of line loss which will be incurred additionally after extension of load i.e. over and above losses after extension of load and not the total losses. In the instant case, LESCO has charged the Complainant the total losses i.e. difference of reading between grid end meter and consumer end meter.
- (iii) Further Clause-2.6(6) of Consumer Service Manual (CSM) provides that for load above 5-MW there is requirement of dedicated transformer(s), dedicated feeder(s) and dedicated grid station alongwith associated lines, however, the consumers may be allowed extension of load beyond 5MW from the DISCO's owned grid station subject to availability of load in the grid and capacity in the 11kV existing dedicated feeder. In the instant case the load was extended from LESCO owned grid station through dedicated feeder of the Complainant, as such tariff category of the Complainant remained under B-3 tariff whereby the billing is to be carried out at consumer end meter i.e. meter installed at the premises and the Complainant is liable to pay only additional losses if any in the light of NEPRA letter No. NEPRA/ADG(Trf)TRF-100/43071-78 dated December 22, 2021. The said directions have also been incorporated in the terms and condition of tariff issued during the year 2022. Moreover, According to USAID Power Distribution Program Planning Guide and recent study of



distribution companies (DISCOs), Annual Energy Loss (AEL) at HT is 3%, therefore, LESCO can only charge the losses which are above 3% i.e. additional losses above the permissible limits.

(iv) Moreover, NEPRA vide decision dated August 27, 2013 in the matter of complaint "M/s Al-Qadir Textile Mills Limited Vs IESCO (IESCO-80/2012)" decided that losses between the grid station and premises upto 3% be borne by IESCO and losses beyond 3% be borne by the Complainant.

5. Foregoing in view, it is concluded that NEPRA vide letter dated December 22, 2021 has already clarified that due to extension of load from 5-MW to 7.5-MW, no additional line losses should be incurred and additional loss if any shall be borne by the respective consumer and permissible limit of 11 kV feeder is 3%. As such the consumer is liable for payment of line loss which are incurred additionally after extension of load i.e. over and above losses of 3% (progressive) and not the total losses. Therefore, LESCO is directed to withdraw all the bills charged to the Complainant on account of total line losses i.e. difference of reading between grid end meter and consumer end meter. LESCO is further directed to charge additional losses (beyond permissible limit of 3% at 11 kV feeder) after extension of load. The complaint is disposed of in above terms.



(Lashkar Khan Qambrani)

Member, Complaints Resolution Committee/
Director (Consumer Affairs)



(Muhammad Irfan ul Haq)

Member, Complaints Resolution Committee/
Assistant Legal Advisor



(Naweed Illahi Shaikh)

Convener, Complaints Resolution Committee /
Director General (CAD)

Islamabad, November 24, 2025

