National Electric Power Regulatory Authority
Islamic Republic of Pakistan

Registrar

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No: NEPRA/R/LAG-65/646-48 January 16, 2018

Mr. Muhammad Toufique.
Director Finance,
Lucky Energy (Private) Limited,
L – A, 2/B, Block – 21,
Federal "B" Area, Karachi.

Subject: **Modification in Generation Licence No: SGC/30/2005**
Licence Application No. LAG-65
Lucky Energy (Private) Limited (LEPL)

Reference: *LEPL's Licensee Proposed Modification (LPM) submitted vide Saqlain Arshad & Co.'s letter dated July 31, 2017 (received on August 01, 2017)*

It is intimidated that the Authority has approved "Licensee Proposed Modification" in Generation Licence No. SGC/30/2005 in respect of Lucky Energy (Private) Limited (LEPL), pursuant to Regulation 10(11)(a) of the NEPRA Licensing (Application and Modification Procedure) Regulations 1999.

2. Enclosed please find herewith determination of the Authority in the matter of Licensee Proposed Modification in the Generation Licence of LEPL along with Modification - IV in the Generation Licence No. SGC/30/2005 as approved by the Authority.

Enclosure: **As Above**

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(Syed Safeer Hussain)

Copy to:

1. Chief Executive Officer, K-Electric Ltd, KE House, 39-B, Sunset Boulevard, Phase-II, DHA, Karachi.
2. Director General, Environment Protection Department, Government of Sindh, Complex Plot No. ST-2/1, Korangi Industrial Area, Karachi.

National Electric Power Regulatory Authority (NEPRA)

Determination of the Authority in the Matter of Licensee Proposed Modification in the Generation Licence of Lucky Energy (Private) Limited

January , 2018
Case No. LAG-65

(A). Background

(i). The Authority in terms of Section-15 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (the "NEPRA Act") granted a generation licence (No. SGC/030/2005) to Lucky Energy (Private) Limited (LEPL) on April 19, 2005 for Natural Gas based generation facilities/Thermal Power Plants. Thereafter, the generation licence of LEPL was modified on September 26, 2007, October 13, 2011 and January 15, 2015.

(ii). The above generation licence was granted to LEPL for its four (04) distinctly located generation facilities/power plants i.e. Plant-I (at 57-Km, Super Highway, Karachi), Plant-II (at L-8, Block-21, Federal "B" Area, Karachi), Plant-III (at L-3, Block-21, Federal "B" Area, Karachi) and Plant-IV (at Plot No A/8-C, SITE, Karachi) The Authority had also allowed Second Tier Supply Authorization (STSA) for supplying to five Bulk Power Consumers (BPCs).

(B). Communication of Modification

(i). In accordance of Regulation-10(2) of the NEPRA Licensing (Application & Modification Procedure) Regulations, 1999 (the "Licensing Regulation"), LEPL communicated a fresh Licensee Proposed Modification (LPM) in its above mentioned generation licence on August 01, 2017.

(ii). In the "text of the proposed modification", LEPL submitted that it intends to enhance its installed capacity from 46.57 MW to 56.575 MW by addition/deletion of generating units. LEPL further submitted that it intends to add/delete BPCs at its different plants. Detail of the proposed modification is given below:

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Plant	Proposed Modification
Plant-I (located at 57-Km, Super Highway, Karachi)	The installed capacity of Plant-I is proposed to be enhanced from 19.65 MW to 30.65 MW by installation of 2 x 3.3 MW (Jenbacher JMS620F) and 1 x 4.4 MW (Jenbacher JMS624H). Further, Lucky Textile Mills Limited No. 5 (LTML-5) and Lucky Knits (Pvt.) Limited No-2 (LKPL-2) are proposed to be added and Fazal Textile Mills Limited (FTML) is proposed to be deleted from the list of BPCs at Plant-I of LEPL.
Plant-II (Located at L-8, Block-21, Federal "B" Area, Karachi)	The installed capacity of Plant-II is proposed to be reduced from 2.475MW to 1.51 MW by de-commissioning of 1x0.965 MW (Caterpillar G3516A).
Plant-III (located at L-3, Block-21, Federal "B" Area, Karachi)	The installed capacity of Plant-III is proposed to be changed from 21.53 MW to 21.50 MW by installation of 3 x 3.3 MW (Jenbacher JMS620F) + 1 x 4.4 MW (JenbacherJMS624H) + 1x1.6 MW (Cummins Diesel Engine) + 2x2.8 MW (Cummins Diesel Engines). Further, Lucky Knits (Pvt.) Limited No-1 (LKPL-1) and Lucky Land Mark (Pvt.) Limited (LLMPL) are proposed to be added to the list of BPCs at Plant-III of LEPL.
Plant-IV (Located at Plot No A/8-C, SITE, Karachi)	No Change

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(iii). Regarding the "statement of the reasons in support of the modification", LEPL submitted that the proposed modification is in public interest as

it will allow LEPL to supply uninterrupted power to its BPCs which will result in increased production of the BPCs to boost the economy of the country. The newly installed units are highly fuel efficient and therefore consume lesser gas with high reliability which ensures the continuous supply of power to the BPCs. In result of the proposed modification the production of the BPCs will be enhanced and it will also provide employment opportunities to the skilled and non-skilled workers of the country. The proposed modification is in conformity to the applicable documents and specifically Regulation-10 (5) of the Licensing Regulations.

(iv). Regarding the "statement of the impact on the tariff, quality of service and performance by the licensee of its obligation under the licence", LEPL informed that all the arrangement of generation and supply of power are within private property of the LEPL and BPCs and LEPL will supply power to its BPCs at mutually agreed rates. Therefore, proposed modification does not have any impact on tariff, quality of service and its performance under the generation licence. Rather, the proposed modification would facilitate it in fulfilling its obligations under the licence.

(C). Processing of Modification

(i). After completion of all the required information as stipulated under the Regulation-10(2) and 10(3) of the Licensing Regulations by LEPL, the Registrar published the communicated LPM in one (01) English and one (01) Urdu daily newspaper on August 30, 2017, to seek comments of the general public, interested/affected parties, and different stakeholders about the communicated LPM as required under the Regulation-10(4) of the Licensing Regulations.

(ii). Apart from the above notice in the press, separate letters were also sent to Government ministries/attached departments and other representative organizations etc. on August 30, 2017. Through the said letters, the stakeholders were informed about the communicated LPM and publication of notice in the press and invited to submit their views and comments for the assistance of the Authority.

(D). Comments of Stakeholders

(i). In response to the above, The Authority received comments from

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four (04) stakeholders. These included K-Electric Limited (KEL), Sui Southern Gas Company Limited (SSGC), Anwar Kamal Law Associates (AKLA) and Petroleum Division Ministry of Energy (PDMoE). The salient points of the comments offered by the above mentioned stakeholders are summarized in the following paragraphs: -

(a). KEL in its comments did not support the LPM on the following grounds:

(i). Article-7 of its distribution licence states that subject to the provisions of Section-22 of the NEPRA Act, KEL during the term of the distribution licence that is for twenty (20) years have the exclusive right to provide distribution service, make sales of electric power, make schemes and engage in incidental activities in the service territory. This service territory excluded BPCs which were already operating their own distribution systems within the service territory on the date of issuance of KEL's distribution licence. The generation licence of LEPL and its modification does not fall within this exclusion and hence its distribution activities and sales of electric power to BPCs within the exclusive jurisdiction of service of KEL.

(ii). The exclusivity of KEL is also protected by virtue of Section-21(2)(a) of the NEPRA Act read with Rule-7 of the NEPRA Licensing (Distribution) Rules, 1999 (the "Distribution Rules") and NEPRA is not permitted to grant STSA. Further, Section-22 of the NEPRA Act does not permit, a generation licensee, through modification in the licence to allow sale of electric power in the service territory of KEL after fifteen (15) years of the commencement of the NEPRA Act. Thus, after 2012 NEPRA cannot permit and is statute barred from granting any generation company permission or licence to sale electricity within the service territory of KEL;

(iii). The exclusivity of KEL, including the exclusive right to make sale of electricity, is applicable for the whole of KEL's service territory and is not restricted to public property. Therefore, the sale of electricity to any other entity including BPCs violates the

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exclusivity of KEL, regardless of the fact that the property is public or not, therefore, the same cannot be allowed by NEPRA. This has been duly confirmed in the judgment of the Honorable High Court of Sindh dated June 17, 2014 in the case of KEL vs. Lotte Powergen (Pvt.) Ltd and others (in Suit 1638 of 2013) in which NEPRA was a co-defendant. The said judgment was never appealed and has attained finality. Hence, NEPRA cannot allow LEPL to make supply surplus electric power by allowing addition of new BPCs (i.e. LTML-5, LKPL and LLMPL) in the exclusive territory of KEL and modify the term of supply of existing BPC's after 15 years of commencement of NEPRA Act;

(iv). The KEL's exclusivity to provide distribution services in its service territory requires KEL to serve a broad range of consumers, some of which (life line consumers and residential consumers up to 300 units) pay lower tariff and are cross subsidized from other residential, bulk industrial and commercial consumers. It is therefore critical for KEL to ensure that it has access to entire service territory as defined in the distribution licence and various categories of consumers therein. This is supported by the Section-21 of NEPRA Act which allows the licensee the exclusive rights to provide distribution services and to make sales of electric power to consumers in the territory specified in the licence and to frame schemes in respect of that territory, for such period as may be specified in the licence;

(v). Any unilateral variation in the existing and projected demand in the service territory through permission and STSA is bound to materially and adversely affect KEL and its consumers through lower capacity utilization resulting in higher prices and stranded generation and transmission assets. NEPRA by giving exclusivity to KEL in its distribution licence duly backed with the statutory force and protection is estopped from diluting such vested and established distribution rights of KEL. NEPRA

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through the distribution licence has represented, warranted and undertaken in pursuance of the relevant provisions of the NEPRA Act that KEL's right to make sales of electricity is exclusive in its service territory. Any departure from the exclusive rights conferred by NEPRA under and pursuant to the NEPRA Act will result in material and adverse impact and detriment to its financial, technical and legal performances and hence NEPRA is estopped from dilution of the exclusive distribution rights of KEL. Further, KEL has been conferred an exclusive title and a right, with grant of distribution licence, through operation of proprietary estoppel, for carrying out exclusive distribution of electricity in its service territory and it shall be unconscionable if this exclusivity is revoked, limited or reduced. For the reasons and grounds stated hereinabove, KEL vehemently objects to the grant of proposed modification to the generation licence of LEPL.

(b). SSGC in its comments informed that it registers consumers under captive power category for self use only. As per record, SSGC has not issued NOC for sale of surplus power to the BPCs. Further, as per Government of Pakistan (GoP) directives the application for new gas connection/load enhancement case can only be processed through supply of RLNG on as and when available basis and subject to completion of all codal formalities;

(c). PDMoE in its comments endorsed the comments of SSGC and requested to consider the same before proceeding further with the LPM; and

(d). AKLA in their comments submitted that DISCOs are exploiting the situation and their monopoly is adversely affecting the economy of Pakistan and her citizens. In view of the said, the approach on the basis of which the LPM has been sought by LEPL is supported but at the same time the matter requires that a clear regime should be developed to get rid of monopoly and introduce competition. Further, AKLA in their detailed comments have submitted that:

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(i). Under the power conferred upon Section-22 of the NEPRA Act and Rule-7 of the Licensing (Generation) Rules, 2000 (the "Generation Rules"), the Authority allowed SPPs/CPPs to sell electricity to BPCs under the STSA. The maximum period for which the Authority could grant this STSA was 15 years from the commencement of the NEPRA Act, i.e. till December 2012 and after 15th December 2012, the Authority has no power to grant the STSA. After the expiry of the 15 years, the Authority should have given a clear ruling in the matter. It is not clear whether after 15 years the regime of direct supply of electricity to BPCs by power producers is finished or continued? However, in the presence of the discouragement of monopoly and the concept of competitive electric power market, AKLA understand that after 15 years the business of sale to BPCs needs to be continued but without the permission of NEPRA. However, this requires guidelines from the Regulator. Unfortunately the Authority did not bother to give its ruling in this regard;

(ii). The Authority, while granting the generation licences to SPPs, decided that SPPs can neither add a new BPC nor can replace the existing consumers. AKLA have noted that NEPRA is making the decisions against the provisions of its own applicable documents/laws. AKLA request the Authority to review the regime of SPPs/CPPs in the light of the determinations of the Authority rendered in the matter of grant of generation licences and their tariff determinations and remove the illegality.

(ii). The Authority examined above comments of the stakeholders and found that the stakeholders have raised certain observation regarding the LPM of LEPL in its generation licence. Accordingly, the Authority considered it appropriate to seek perspective of the licensee/LEPL on the observations of KEL, SSGC, PDMoE and AKLA.

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(iii). In reply to the comments/observations of KEL, the licensee/LEPL has submitted that comments of KEL deserve to be rejected out rightly as KEL has no locus standi under the NEPRA Act to challenge the LPM. The LPM of LEPL in no way affects the services of KEL as LEPL or any of its BPCs are located on private property and do not have any electric connection of KEL. LEPL holds a generation licence since 2005 and supply power to its BPCs under a valid licence from NEPRA.

(iv). LEPL further submitted that similar objections taken by KEL were rejected by the honorable Authority while rendering its determination dated January 15, 2015 in Modification-III of LEPL and therefore the instant objections of KEL deserves the same treatment and should be rejected. It is worth mentioning that KEL never challenged licence of' LEPL nor any subsequent modifications until LEPL filed Modification-IV in its licence. Furthermore the determination had attained finality as neither KEL filed a review petition against said determination not it has challenged the same on any other forum. Therefore the instant objections are merely an effort to stall the proceedings before this honorable Authority without any legal substance and justification.

(v). On the observations of KEL regarding exclusive right to distribute electricity in its service territory, LEPL submitted that distribution of electric power simply means that KEL has the exclusivity to deliver or supply electricity on a public property i.e., from point 'A' to point 'B' through its distribution network. KEL generates power from its own generation fleet and also purchase power from various IPPs/generation companies. Under the NEPRA Act, the role of distribution licence is that of a courier, i.e. that if electricity is generated at point 'A', and if it needs to be delivered at point 'B', then it can only be delivered to point 'B' through distribution network of KEL. The supply of electricity on a private property has been purposely and specifically excluded from the definition of "Distribution" under the NEPRA Act. It is submitted that "exclusivity to distribute" only safeguards KEL in relation to recover distribution cost or the use of system charges, if at all distribution network of KEL is used. The supply of power from LEPL to its BPCs on a private property does not any way affect KEL system. The claim of KEL that only KEL can generate and supply electricity is in sheer violation of NEPRA Act, as it simply means that all generation companies, captive power plants or the private generators owners should stop producing electricity and purchase power from KEL

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It is submitted such interpretation of NEPRA Act is fatal and against the express provisions of the NEPRA Act. LEPL has further submitted that NEPRA Act, while provision of exclusivity to KEL has also allowed generation companies to generate power and supply power to its BPCs. All that KEL can lawfully claim is that movement of electricity in KEL area can be done through distribution network of the KEL. However if captive power plant is supplying power to its own units or in the case of LEPL providing electricity to its own sister concerns companies, located within private property, KEL has no legal right under NEPRA Act to object to such arrangement.

(vi). In addition to above reasons, it is submitted that KEL has no legal justification to object to the LPM of LEPL when the LPM is not prejudice to the interest of KEL. Rather it is an indirect assistance to KEL in relation to its obligation to provide electricity to its consumers without load shedding. KEL is obliged to provide reliable, efficient and uninterrupted supply to its consumers however it has been observed that KEL has been struggling in controlling the outages in Karachi. It is pertinent to state that KEL service territory will only be endangered if a company proposes to distribute electricity in the defined service area of KEL. It is abundantly clear on the record that LEPL is generating and providing electricity to its own BPCs which are located in private property owned by LEPL.

(vii). Regarding supply/distribution of electricity to BPCs, LEPL has submitted that it would be helpful to see the definition of the term "distribution" under Section-2 of the NEPRA Act which states that "distribution" means the ownership, operation, management or control of distribution facilities; for the movement or delivery or sale to consumers of electric power; But shall not include the ownership, operation, management and control of distribution facilities; located on private property; and used solely to move or deliver electric power; to the person owning, operating, managing and controlling those facilities or to tenants thereof. In view of the said definition of "distribution" in the NEPRA Act, it is clarified that LEPL is providing electricity to its own BPCs and as such not doing activity of distribution therefore not hurting the exclusivity granted to KEL.

(viii). LEPL submitted that its foregoing analysis is supported by Section-21 and 22 of the NEPRA Act. The proviso of Section-21 (2) (a) states that "Provided that a generation company may make sales of electric power to BPCs

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within such territory as the Authority may allow, subject to Section-22, for a period of fifteen (15) years. Section-22 of the NEPRA Act is only referred for understanding of distribution regime, as it is abundantly clear that Section-22 was only applicable for 15 years from the commencement of the NEPRA Act and as of today is not more in field. So a generation company at all relevant times were allowed to generate and sell electric power to a DISCO or to a BPCs subject to Section-22 of the NEPRA Act. Further, Section-22 of the NEPRA Act ensured that in case a BPC having a connection of a DISCO wanted to stop purchase of electric power from a DISCO, the BPC was required to give three years notice as well as to pay cross subsidy for uneconomic service to its DISCO as compensation for loss of business to DISCO. It is submitted that arrangement of LEPL being on private property do not help case of KEL as LEPL or its BPCs have no connection from KEL.

(ix). Regarding the order passed by Honorable Sindh High Court in Suit 1638 of 2013 dated June 17, 2014, LEPL submitted that the said order passed on an application filed by KEL and was in fact a tentative assessment of the Honourable Court. It is submitted that an appeal was filed by NEPRA against the said order and the Order was declared as a tentative view of learned single judge, therefore reliance of KEL on the said order is misplaced. KEL has also attempted to prove its stance by stating that in view of catering life line consumers, KEL has an absolute right to have access to all kind of prized consumers i.e., commercial or industrial BPCs. The plea is irrelevant as NEPRA through multiyear tariff have already taken care of all prudent costs to KEL and on the pretext of providing electricity to life line consumers, KEL cannot claim that all BPCs in its territory having connection from captive power plants or having private generator should stop purchasing electricity and instead now connect to KEL.

(x). LEPL further submitted that Section-22 of the NEPRA Act, till 15 years helped DISCOs to retain their existing BPCs, however by no means it can be assumed that KEL can insist private generators to stop producing electricity as such 15 years have lapsed. LEPL is of the view that rather today if a BPC of KEL, can switch to have supply from different source even without need to serve any notice or to pay compensation to KEL. In view of the said submissions, LEPL requested to reject comments of KEL and to issue appropriate directions to KEL to stop making hurdles in the lawful business being carried out by HEPL and its associate

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companies.

(xi). On the observations of SSGC and PDMoE, LEPL submitted that it has a valid Gas Supply Agreement (GSA) with SSGCL under which LEPL is operating its natural gas based power plants as per the original arrangement under the GSA with SSGC regarding gas allocation. Under the proposed LPM, no additional gas load will be required as the existing sanctioned load will be sufficient to operate the plants. Further, LEPL being a SPP is providing electricity to its sister concern entities which is in line with the terms of GSA. It is further stated that various SPP of the country are supplying power to other companies as being done by LEPL, therefore no discrimination may be made for LEPL. Later on, SSGC through its letter dated December 05, 2017 clarified that the power generating units of LEPL have been issued gas connection for supplying power to its sister concern/industrial units only.

(xii). On the observations of AKLA, LEPL submitted that comments of AKLA are in favor of the LPM. LEPL further submitted that AKLA has made certain recommendations in relation to power sector of the country which may be considered by the Authority for appropriate orders.

(xiii). The Authority considered the above reply of LEPL to the comments of stakeholders and found the same plausible. Regarding the observations of KEL and AKLA, the Authority has observed that Section-21 of the NEPRA Act deals with the rights and liabilities of a distribution licensee and states that the Authority may, subject to conditions specified in the NEPRA Act grant distribution licence and the licensee shall possess exclusive right to provide distribution and to make sale of electric power to consumers in the territory specified in the licence. Further, Section-21 carves out an exception to aforementioned exclusivity of a distribution licensee and allows a generation company to make sales to a BPC within the territory of distribution licensee.

(xiv). In this regard the Authority observes that the exclusive distribution right granted to distribution licensees is subject to conditions specified in the NEPRA Act. The NEPRA Act imposes certain conditions on a distribution licensee and that licensee cannot enjoy exclusivity without corresponding obligations to provide safe, continuous and reliable electricity to consumers. Thus a distribution

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licensee cannot claim the exclusive right as an absolute right for the reason that the NEPRA Act does not intend to create a monopoly to sell electricity to consumers being bonded consumers. Moreover, proviso to Section-21 of the NEPRA Act further clarifies the intention of the legislature by carving out an exception to aforementioned exclusive right of a distribution licensee. The said Proviso categorically states that a generation company may make sales of electric power to BPCs within such territory as the Authority may allow, subject to Section-22 for a period of fifteen (15) years. Proviso to Section-21 explicitly bifurcates sales of electric power from delivery of electric power and allows sales of electric power by another licensee to BPC in the territory of a distribution company, thereby negating the exclusivity of a distribution licensee with respect to sales of electric power. Any generating company intends to sell power to a BPC located within service territory of a distribution company, it will seek STSA from the Authority under Section-21 of the NEPRA Act read with Rule-7 of the NEPRA Licensing (Distribution) Rules, 1999 ("the Distribution Rules").

(xv). Regarding the period of fifteen (15) years, The Authority has observed that the Rule-7 of the Distribution Rules read with Proviso to Section- 21 of the NEPRA Act make it abundantly clear that the Authority may allow, for a period of fifteen (15) years from the commencement of NEPRA Act, a generation company to supply electric power to BPCs in the territory of a distribution licensee. It may however be clarified that such restriction was for fifteen (15) years from the commencement of the NEPRA Act and that after December 16, 2012 BPCs are free to get supply of electricity from any source without re-coursing to Section-21 and 22 of the NEPRA Act. It is clarified that time period mentioned in Proviso to Section-21 read with Section-22 of the NEPRA Act does not restrict the powers of the Authority to allow a generation company to supply electric power to a BPC in the territory of a distribution licensee only for the fifteen (15) years from the commencement of the NEPRA Act. Such restrictive interpretation of period of fifteen (15) years mentioned in the Proviso is against the spirit of the NEPRA Act, undermines the competitive environment and discourages the investment in private sector resulting in enhanced demand and supply gap. It is a settled principle of law that a statute has to be read as whole and no single provision can be read to arrive at a just and correct interpretation. Therefore, period of 15 years cannot be read in isolation, it has to be interpreted in the context of scheme of the law. The NEPRA

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Act envisages a competitive market which was duly translated in the licence of NTDC setting year 2012 as Commercial Market Operation Date, meaning thereby after fifteen (15) years of commencement of the NEPRA Act power market will be opened for bilateral contracting. Therefore, fifteen (15) years mentioned in the Proviso cannot be read as to disallow sales of electricity by a generation company to BPCs in the territory of a DISCO rather that no such permission will be required after 15 years of commencement of 15 years of the NEPRA Act.

(xvi). Further, the Authority considers that the assertion of KEL regarding suit 1638/2013 that judgment in this particular case was never appealed by NEPRA, therefore it has attained finality, is not correct. The order passed in suit No. 1638/2013 was interim which was duly appealed. However, after merger of Lotte Power which was the necessary party for filing appeal in the matter, the appeal became infructuous. However, Bench while disposing off the matter has ordered that interim order passed by the Single Bench will not come in way of the parties. Further, suit No. 1630/2013 is being heard by the Single Bench on regular basis.

(xvii). Foregoing in view, the Authority considered it appropriate to proceed further with the communicated LPM as stipulated in the Licensing Regulations and the Generation Rules.

(E). Evaluation of the Case

(i). The Authority has examined the entire case in detail including the already granted Generation Licence, the communicated LPM, comments of the stakeholders, submissions of LEPL and relevant rules & regulations.

(ii). In this regard, the Authority observes that in terms of Regulation-10(5) of the Licensing Regulations, the Authority is entitled to modify a licence in accordance with an authority proposed modification or LPM, subject to and in accordance with such further changes as the Authority may deem fit if, in the opinion of the Authority such modification (a). does not adversely affect the performance by the licensee of its obligations; (b). does not cause the Authority to act or acquiesce in any act or omission of the licensee in a manner contrary to the provisions of the NEPRA Act or the rules or regulations made pursuant to it; (c). is or is likely to be beneficial to the consumers; (d). is reasonably necessary for the

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licensee to effectively and efficiently perform its obligations under the licence; and (e).is reasonably necessary to ensure the continuous, safe and reliable supply of electric power to the consumers keeping in view the financial and technical viability of the licensee.

(iii). The main features of the LPM under consideration are that the Authority granted LEPL a generation licence (No. SGC/30/2005 dated April 19, 2005 for its four distinctly located natural gas/diesel based generation facilities/power plants. The Authority also allowed LEPL three different modification in the said generation licence, for enhancement of capacity and addition/deletion of BPCs. According to the existing generation licence, the accumulative installed capacity of LEPL is 46.57. Further, LEPL is also allowed to supply power to FTML, GTML (from Plant-I), LTML-1 (from Plant-II), LTML-2 (from Plant-III), and LTML-3 (from Plant-IV), as its BPCs.

(iv). Through the current LPM (i.e. LPM-IV), the licensee/LEPL intends to change the installed capacity and number of BPCs. LEPL will now install additional ten (10) generating units with accumulative install capacity of 32.50 MW, including eight (08) Gas Engines [i.e. 5 x 3.3 MW + 2x 4.4 MW], and three (03) Diesel Engines [1x1.6 MW + 2x2.8 MW]. Whereas, LEPL will decommission ten (10) of its existing generating units with 22.515 MW installed capacity. This arrangement will result in about 10 MW increase in installed capacity of LEPL. Further, LEPL also intends to delete FTML and add LTML-5 LKPL-1, LKPL-2 LLMPL in the list of its BPCs.

(v). Plant wise detail of the communicate LPM is as follows:

(a). LEPL plans to enhance the installed capacity of Plant-I from 19.65 MW to 30.65 MW by addition of 2 x 3.3 MW (Jenbacher JMS620F) and 1 x 4.4 MW (Jenbacher JMS624H). Further, LEPL intends to add LTML-5 and LKPL-2 and exclude FTML from the list of BPCs at Plant-I.

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(b). At Plant-II, LEPL intends to de-commission of the existing unit (i.e. 1x0.965 MW Caterpillar G3516A) which will result in reduction of capacity of Plant-II from 2.475 MW to 1.51 MW.

(c). Similarly, at Plant-III, LEPL intends to decommission all the existing generating units and to install new generating units which include 3 x 3.3 MW (Jenbacher JMS620H) + 1 x 4.4 MW (JenbacherJMS624H) + 1x1.6 MW (Cummins Diesel Engine) + 2x2.8 MW (Cummins Diesel Engines). This will change the installed capacity of Plant-III from 21.53 MW to 21.50 MW. LEPL also plans to add LKPL-1 and LLMPL in the list of BPCs at Plant-III.

(d). There is no change in capacity or list of BPCs of Plant-IV.

(vi). According to the provided information in LPM the new net capacity of LEPL is 54.317 MW which sufficient to meet the requirements of its BPCs. The net capacity will be distributed among the BPC according to new contracted load. The contracted load of BPCs are 17.50 MW (Gadoon Textile), 6.00 MW (LTML-5), 0.50 MW (LKPL-2), 1.30 MW (LTML-1), 1.5 MW (LTML-2), 0.70 MW (LKPL-1), 9.0 MW (LLMPL) and 2.43 MW (LTML-3).

(vii). Regarding supply to the BPCs, the Authority has observed that both the existing and proposed BPCs of LEPL at its different plants are located within the same premises without involving any public property. Therefore, the Authority is of the view that supply of power to the BPCs by LEPL does not constitute a distribution activity under the NEPRA Act, and LEPL will not require a distribution licence for supplying to the BPCs.

(viii). In view of the above, the Authority considers that the LPM will not have any adverse effect on the performance of the licensee of its obligations as it will enable it to supply the available energy for a considerable time. Further, the LPM will not cause the Authority to act or acquiesce in any act or omission of the licensee in a manner contrary to the provisions of the NEPRA Act or the rules or regulations made pursuant to the NEPRA Act. The LPM will be beneficial to the consumers in general as relatively cheap and reliable electricity will be available to the BPCs. The LPM is reasonably necessary for the licensee to effectively and efficiently perform its obligations under the licence. The LPM is necessary to ensure the continuous, safe and reliable supply of electric power to the consumers keeping in view the financial and technical viability of the licensee.

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(F). Approval of LPM

(i). In view of the above, the Authority is satisfied that LEPL has complied with all the requirements of the Licensing Regulations pertaining to the modification. Therefore, the Authority in terms of Regulation-10(11)(a) of the Licensing Regulations approves the communicated LPM.

(ii). Accordingly, the generation licence (No. SGC/030/2005 dated April 19, 2005) is hereby modified. The changes made in the generation licence and STSA are attached as annexure to this determination. The approval of the LPM will be subject to the provisions contained in the NEPRA Act, relevant rules framed there under, terms & conditions of the generation licence and other applicable documents.

Authority

Syed Masood-ul-Hassan Naqvi
(Member)

15/1/18

Himayat Ullah Khan
(Member)

Saif Ullah Chattha
(Member/Vice Chairman)

16.1.2018

Tariq Saddozai
(Chairman)

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16 01 18

National Electric Power Regulatory Authority (NEPRA)

Islamabad – Pakistan

GENERATION LICENCE

SGC/30/2005

In exercise of the Powers conferred under Section-26 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 the Authority hereby modifies the Generation Licence granted to Lucky Energy Private Limited to the extent of changes mentioned as here under.

(i). Installed capacity mentioned in the **Face Sheet** may be read as **56.575 MW** instead of **46.57 MW**;

(ii). Changes in **Schedule-I** attached as **Modified/Revised Schedule-I**; and

(iii). Changes in **Schedule-II** attached as **Modified/Revised Schedule-II.**

(iv). Changes in **STSA** attached as **Modified/Revised STSA.**

This **Modification-IV** is given under my hand this 16th **day** of **January Two Thousand** & **Eighteen**

16 01 18

Registrar

NATIONAL ELECTRIC POWER REGULATORY AUTHORITY ★ NEPRA ★ REGISTRAR

SCHEDULE-I
(Revised/Modified)

The Location, Size (i.e. Capacity in MW), Type of Technology, Interconnection Arrangements, Technical Limits, Technical/Functional Specifications and other details specific to the Generation Facilities of the Licensee are described in this Schedule.

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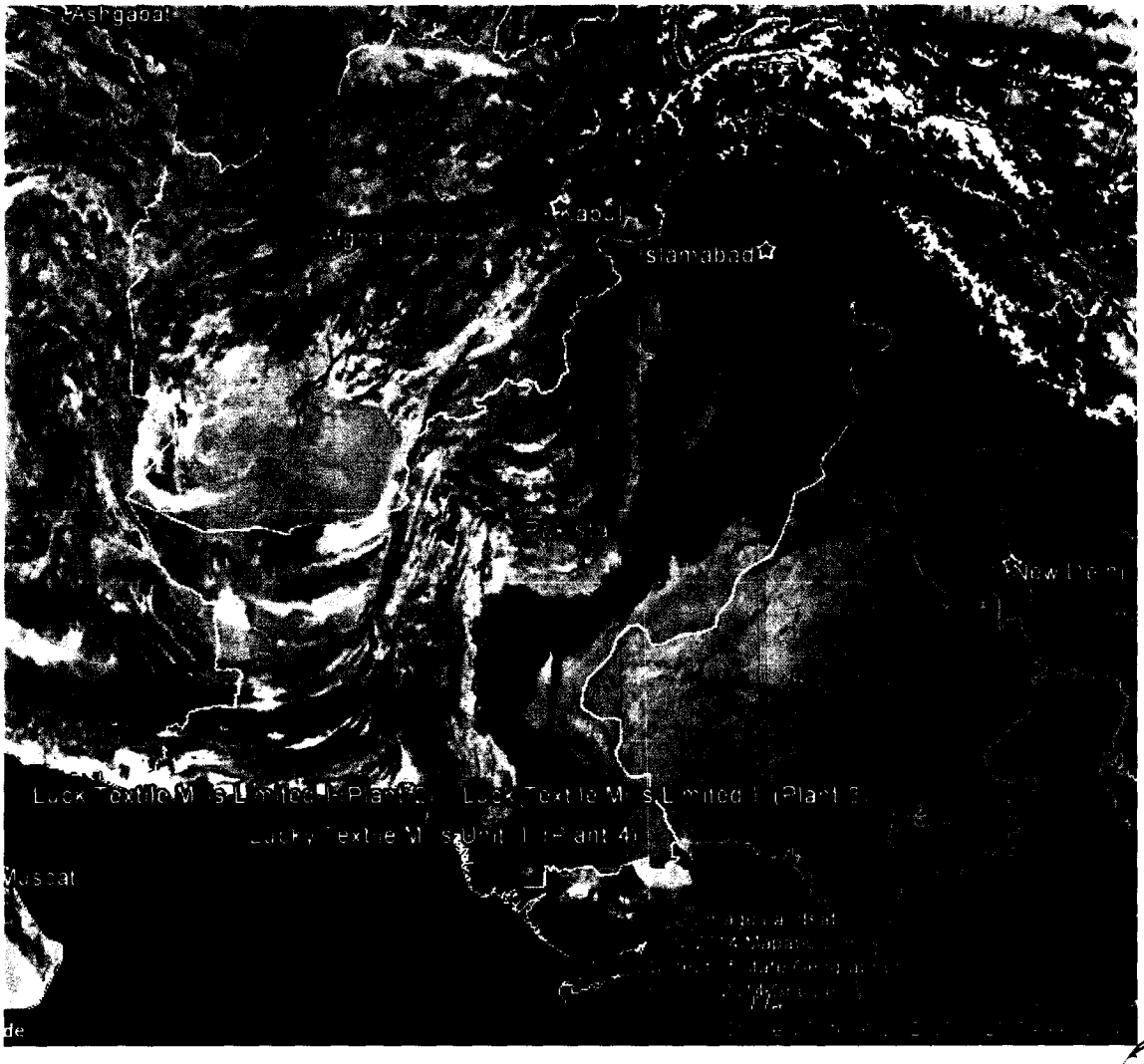
Location Map of Generation Facilities of Lucky Energy (Pvt.) Limited (LEPL)



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Location/Layout of Plant-I of LEPL

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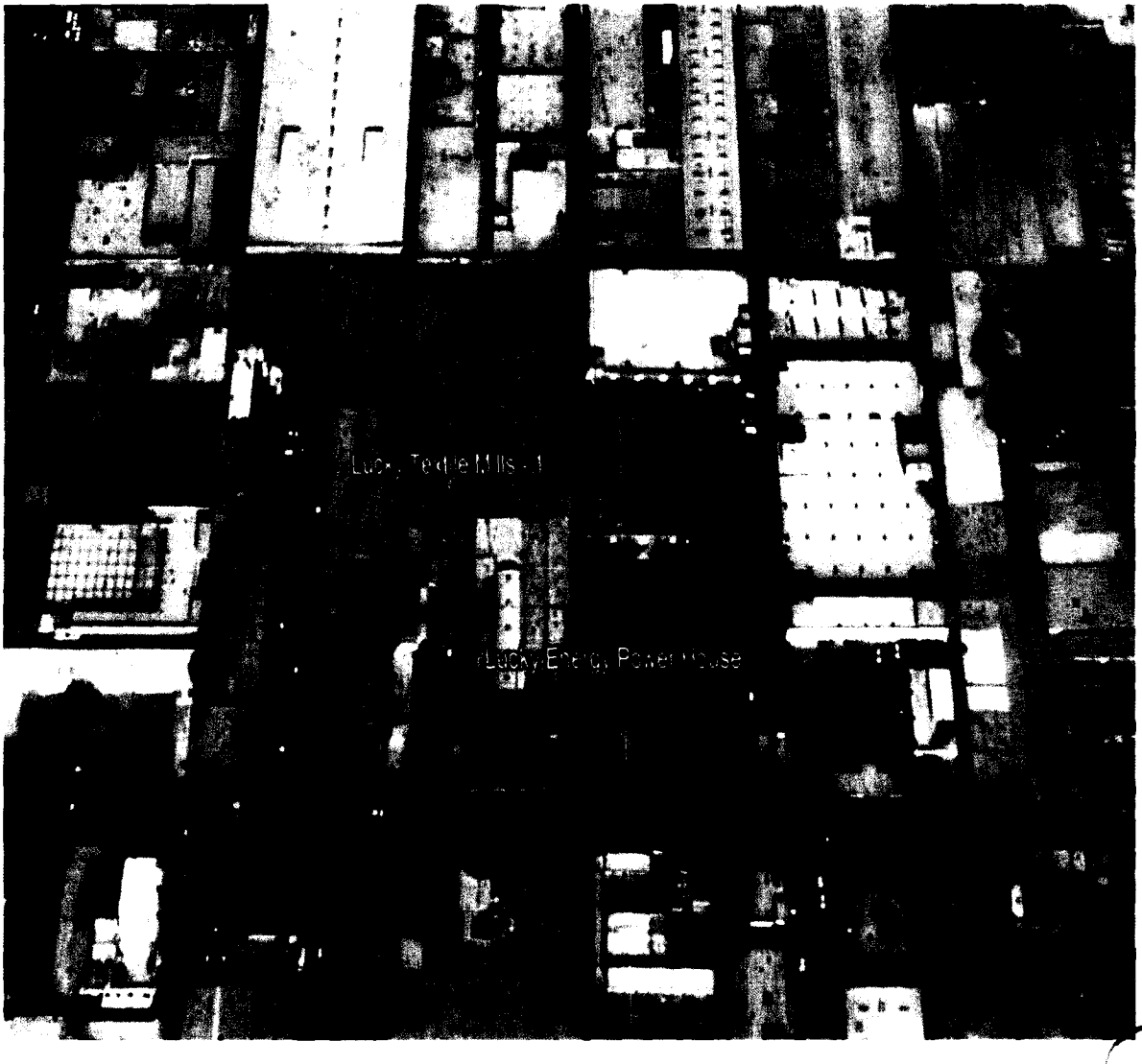
Location/Layout of Plant-II of LEPL



Location/Layout of Plant-III of LEPL

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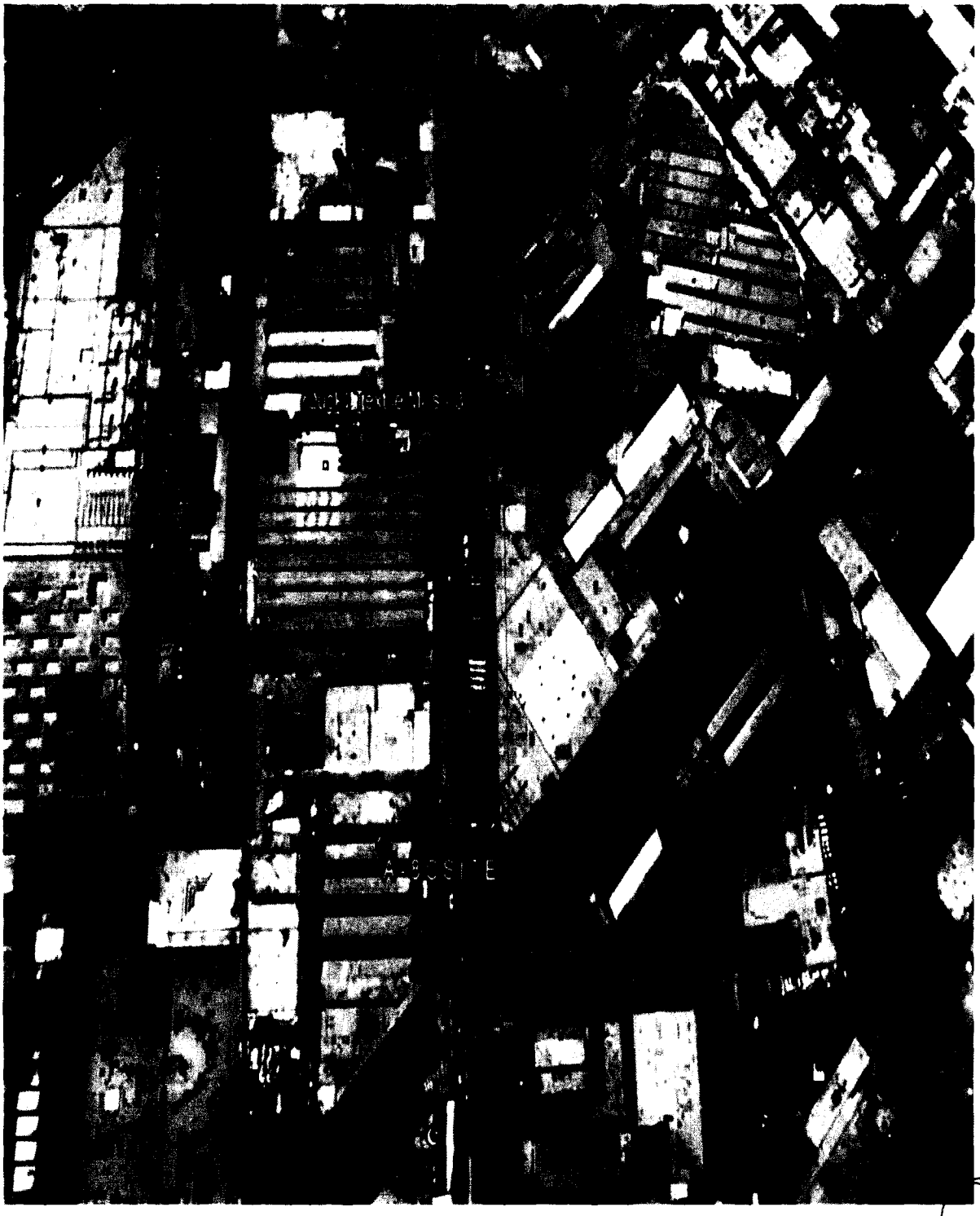
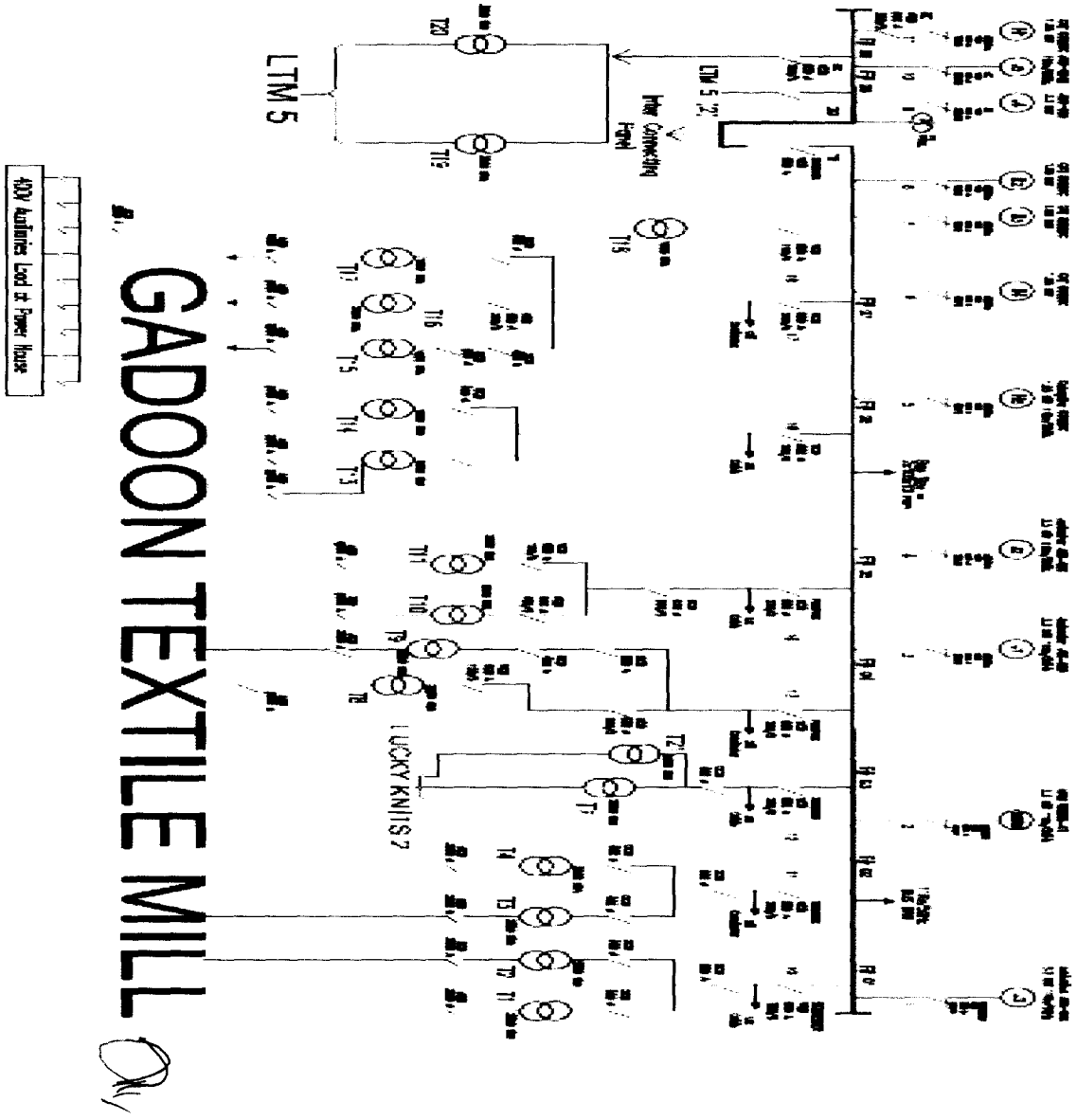
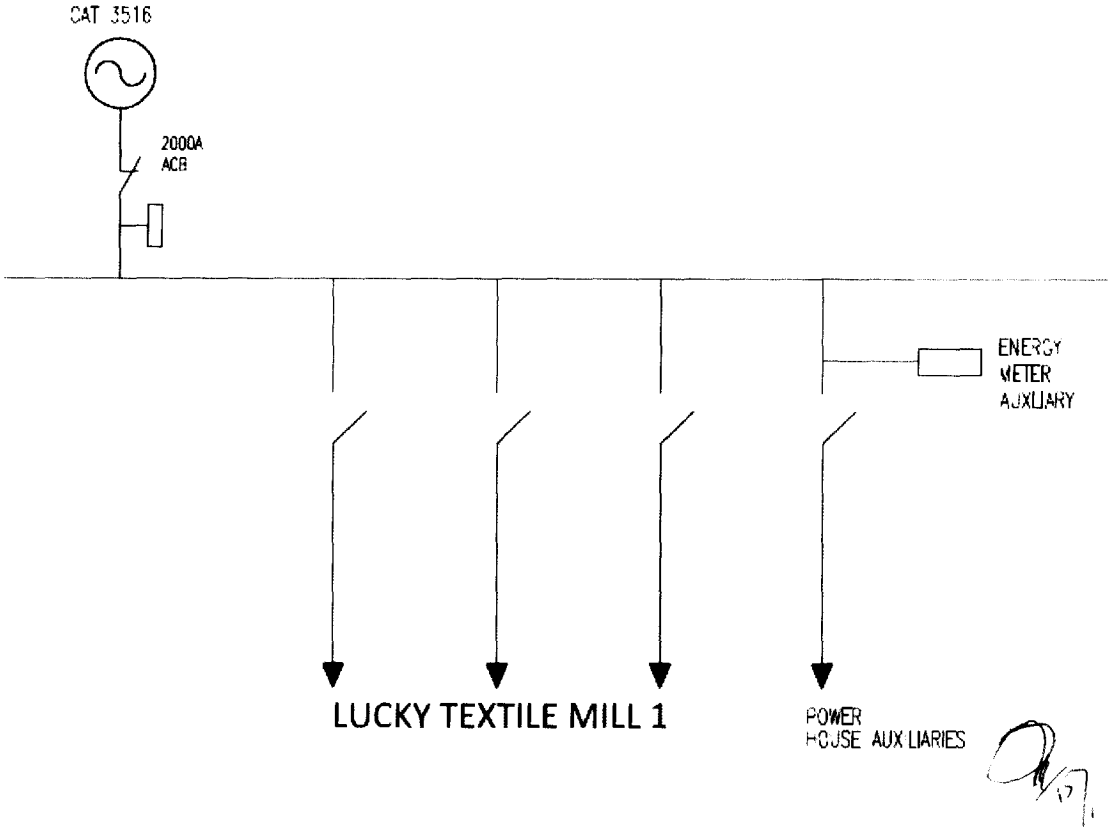
Location/Layout of Plant-IV of LEPL



Single Line Diagram (Electrical) of Plant-I of LEPL



Single Line Diagram (Electrical) of Plant-II of LEPL



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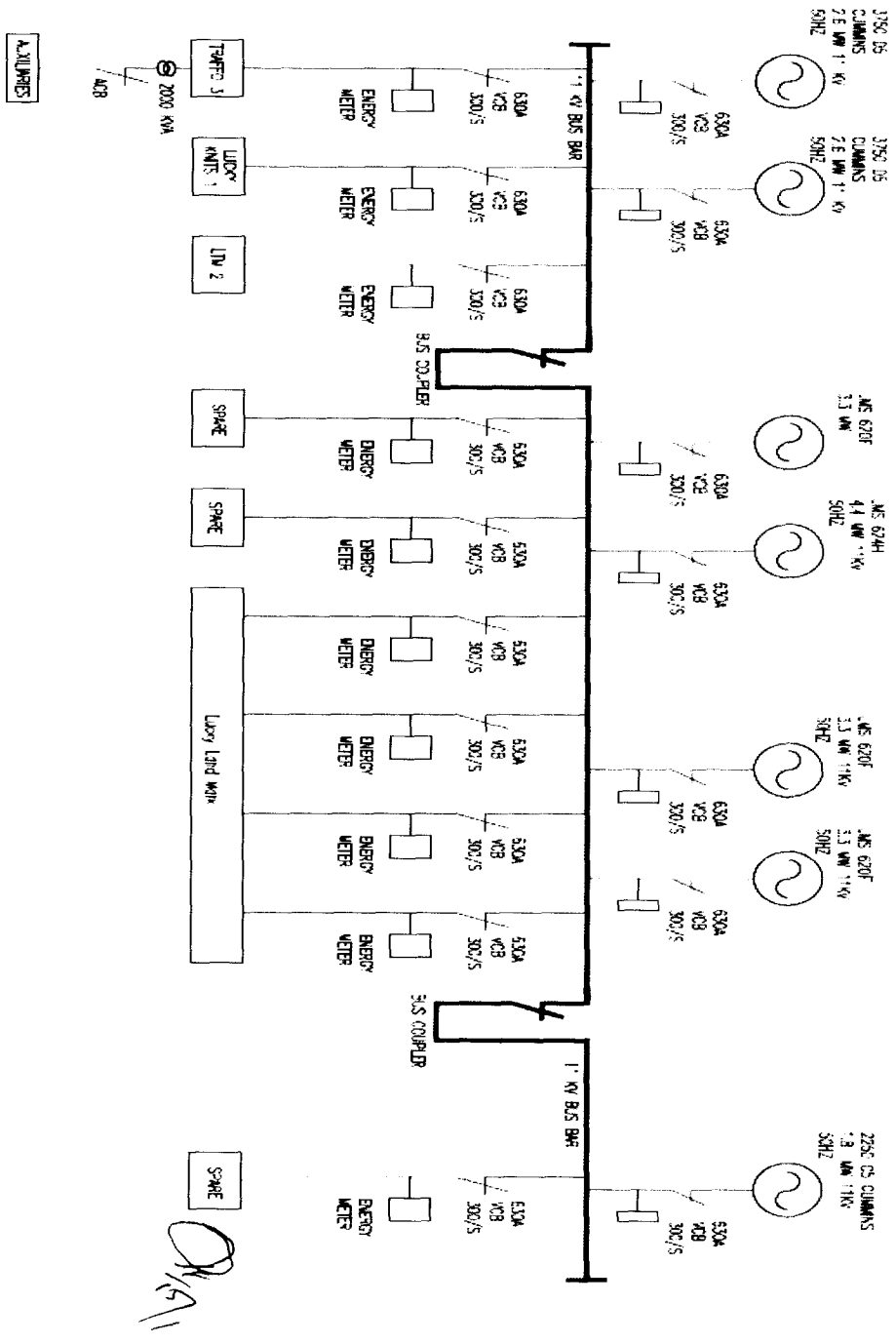
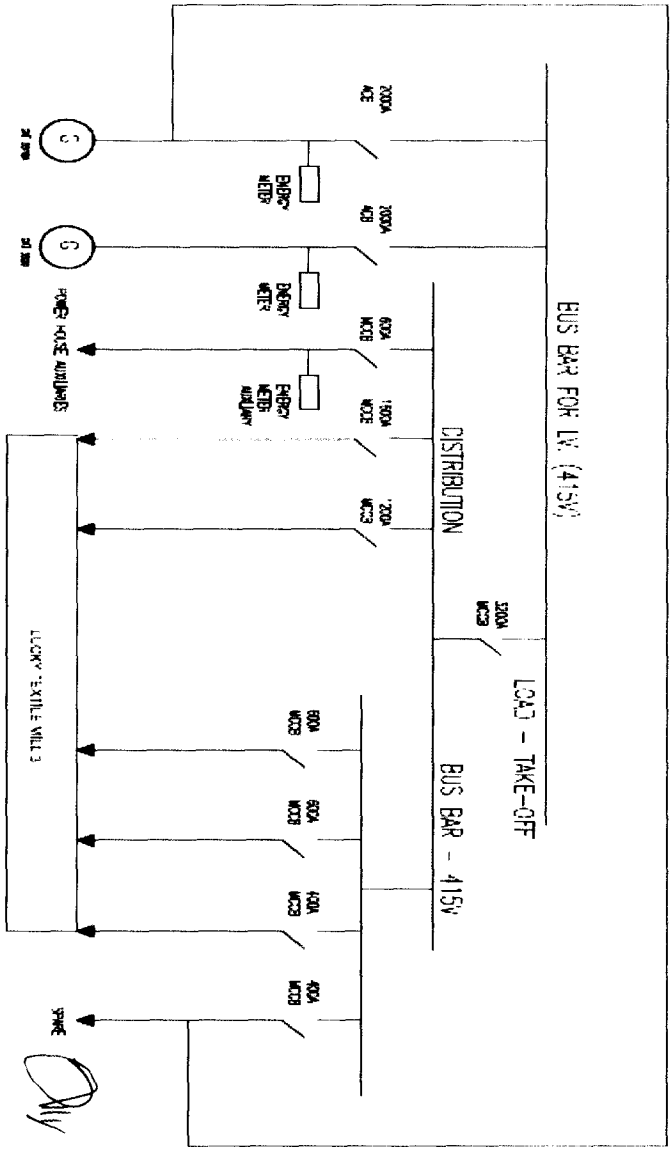
Single Line Diagram (Electrical) of Plant-III of LEPL



Single Line Diagram (Electrical) of Plant-IV of LEPL



Plant Details

(A). General Information

(i).	Name of Applicant	Lucky Energy (Pvt.) Limited			
(ii).	Registered/Business Office	L-A, 2/B, Block-21, Federal "B" Area, Karachi.			
(iii).	Plant Location	Plant-I	Plant-II	Plant-III	Plant-IV
		57-Km, Super-highway, Karachi	L-8, Block-21, Federal "B" Area, Karachi	L-3, Block-21, Federal "B" Area, Karachi	Plot No. A/8-C, SITE, Karachi.
(iv).	Type of Generation Facility	Thermal Generation Facilities			

(B). Plant Configuration

	Plant Size Installed Capacity MW (Gross)	
(i).	Plant-I	30.65
	Plant-II	1.51
	Plant-III	21.50
	Plant-IV	2.915
(ii).	**Plant type**	
	Plant-I	Gas Engines (G.E.)
	Plant-II	G.E.
	Plant-III	G.E. + Diesel Engine (D.E.)
	Plant-IV	G.E.
(iii).	**Number of Units/Size/Make & Model**	
	Plant-I	5 x1.95MW (Caterpillar-G3520C) + 2x3.3MW (Jenbacher-JGS620F) +

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		2x3.3 MW (Jenbacher-JMS620F) + 1x 4.4 MW (Jenbacher-JMS624H) + 1 x 3.3 MW (MWM-CG60-12CG260-12)
	Plant-II	1 x 0.965 MW (Caterpillar 3516)
	Plant-III	3x3.3 MW Jenbacher JMS620F + 1 x 4.4 MW (Jenbacher JMS624H) + 1x1.6 MW(CUMINS D.E.) + 2x2.8 MW (CUMINS D.E.)
	Plant-IV	1x1.95 MW (Caterpillar G3520C) + 1x0.965 MW (Caterpillar G3516A)
(iv).	**Commissioning/ Commercial Operation Dates (COD) of units of the Generation Facilities**	
	Plant-I	5 x Caterpillar-G3520C: September 30, 2007, 2 x Jenbacher- JGS620F : July 31, 2011 1 x Jenbacher-JMS620F: May 21, 2014 1 x Jenbacher-JMS620F: March 03, 2015 1x Jenbacher-JMS624H: April 04, 2017 1 x MWM-CG260-12: February 28, 2013
	Plant-II	1xMWM-CG 170-16: February 28, 2013
	Plant-III	3 x Jenbacher- JMS620F: December 05, 2016 1 x Jenbacher-JMS624H: August 12, 2017 1 x CUMMINS D.E.: November 15, 2017 1 x CUMMINS D.E.: December 21, 2016 1 x CUMMINS D.E.: December 12, 2016
	Plant-IV	1xCaterpillar-3520C: May 23, 2005 and 1xCaterpillar 3516A: April 23, 1995
(v).	**Minimum Expected Life of units of the Generation Facilities from COD**	
	Plant-I	Caterpillar-G3520C: 20 Years Jenbacher- JGS620F: 20 Years Jenbacher-JMS620F: 20 Years

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		Jenbacher-JMS620F: 20 Years Jenbacher-JMS624H: 20 Years MWM-CG260-12: 20 Years
	Plant-II	MWM-CG 170-16: 20 Years
	Plant-III	Jenbacher- JMS620F: 20 Years Jenbacher-JMS624H: 20 Years CUMMINS Diesel Engine: 20 Years CUMMINS Diesel Engine: 20 Years
	Plant-IV	Caterpillar-3520C: 20 Years Caterpillar 3516A: 20 Years
(vi).	**Minimum Expected Remaining useful Life of units of the Generation Facilities at the time of issuance of Modification-III dated January 15, 2015**	
	Plant-I	Caterpillar-G3520C: 13 Years 2xJenbacher- JGS620F: 17 Years Jenbacher-JMS620F: N/A (Added Afterwards) Jenbacher-JMS624H: N/A (Added Afterwards) MWM-CG260-12: 19 Years
	Plant-II	MWM-CG 170-16: 18 Years
	Plant-III	Jenbacher- JMS620F: N/A (Added Afterwards) Jenbacher-JMS624H: N/A (Added Afterwards) CUMMINS D.E.: N/A (Added Afterwards) CUMMINS D.E.: N/A(Added Afterwards)
	Plant-IV	Caterpillar-3520-C: 11 Years Caterpillar-3516-A: 03 Years
(vii).	**Minimum Expected Remaining useful Life of the units of the Generation Facilities at the time of grant of this Modification-IV dated November__, 2017.**	
	Plant-I	Caterpillar-G3520C: 10 Years 2xJenbacher- JGS620F: 14 Years Jenbacher-JMS620F: 16 Years Jenbacher-JMS620F: 18 Years Jenbacher-JMS624H: 20 Years MWM-CG260-12: 16 Years

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	Plant-II	Caterpillar- 3516: 16 Years
	Plant-III	Jenbacher- JMS620F: 19 Years Jenbacher- JMS620F: 19 Years Jenbacher-JMS624H: 20 Years CUMINS Diesel Engine: 20 Years CUMINS Diesel Engine: 20 Years
	Plant-IV	Caterpillar-3520-C: 08 Years Caterpillar-3516-A: 03 Years (Refurbished)

(C). Fuel Details

		Plant-I	Plant-II	Plant-III	Plant-IV
(i).	Primary/Main Fuel	Natural Gas	Natural Gas	Natural Gas + Diesel	Natural Gas
(ii).	Alternate Fuel	Plant-I	Plant-II	Plant-III	Plant-IV
		N/A	N/A	N/A	N/A
(iii).	Fuel Source (Imported/Indigenous)	Plant-I	Plant-II	Plant-III	Plant-IV
		Indigenous	Indigenous	Indigenous	Indigenous
(iv).	Fuel Supplier	Plant-I	Plant-II	Plant-III	Plant-IV
		SSGC	SSGC	SSGC/PSO	SSGC
(v).	Fuel Storage Facilities	Plant-I	Plant-II	Plant-III	Plant-IV
		N/A	N/A	N/A/Tanker	N/A
(vi).	Capacity of Storage Facilities	Plant-I	Plant-II	Plant-III	Plant-IV
		N/A	N/A	N/A/90 Ton	N/A
(vii).	Supply Arrangement	Plant-I	Plant-II	Plant-III	Plant-IV
		Through Pipeline	Through Pipeline	Through Pipeline/ Tankers	Through Pipeline

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(D). Emission Values

(i).	SO_x	0 mg/Nm^3
(ii).	NO_x	200 mg/Nm^3
(iii).	CO_2	0 mg/Nm^3
(iv),	CO	500 mg/Nm^3
(v).	PM_{10}	100 mg/Nm^3

(E). Cooling System

(i).	Cooling Water Source/Cycle	Municipal Supply/Tube Wells through (Reverse Osmosis Plant)

(F). Plant Characteristics

(i).	Generation Voltage	11KV
(ii).	Frequency	50 Hz
(iii).	Power Factor	0.95 Lagging
(iv).	Automatic Generation Control (AGC)	Yes
(v).	Ramping Rate	N/A
(vi).	Time required to Synchronize to Grid and loading the complex to full load.	N/A

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Information Regarding the Bulk Power Consumers (BPCs) to be supplied from Plant-I of the Licensee i.e. LEPL

(i).	No. of BPCs		(03)
(ii).	Name of BPCs		(a). Gadoon Textile Mills Ltd. (GTML), (b). Lucky Textile Mills Ltd. No. 5 (LTML-5) and (c). Lucky Knits (Pvt.) Limited No.2 (LKPL-2)
(iii).	Location of each BPC (distance and/or identity of premises)		(a). GTML: 57 KM Superhighway (b). LTML-5: 57 KM Superhighway (c). LKPL: 57 KM Superhighway
(iv).	Contracted Capacity and Load Factor of BPC.		(a). GTML: 17.50 MW/90% (b). LTML-5: 06.00 MW/90% and (c). LKPL-2: 05.00 MW/90%
(v).	Specify Whether		
	(a).	The BPC is an associate undertaking of the LEPL-If yes, specify percentage. ownership of equity;	Yes-The BPCs are associate undertakings of LEPL with common directorship.
	(b).	There are common directorships;	Yes.
	(c).	Either can exercise influence or control over the other.	Yes.
(vi).	Specify nature of contractual relationship.		
	(a).	Between the BPCs and LEPL.	The BPCs are associated undertakings of LEPL
	(b).	Between the BPCs and DISCO.	Nil
(vii).	Any other network information deemed relevant for disclosure to or consideration by the Authority.		N/A.

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Information Regarding
Distribution Network for Supply of Electric Power to the BPCs from Plant-I of the Licensee (i.e. LEPL)

(i).	No. of Feeder(s).		(a). GTML: 06 (b). LTML-5: 02 (c). LKPL: 01
(ii).	Length of Feeder		(a). GTML: 1000 Meters each (b). LTML-5: 800 Meters each and (c). LKPL: 300 Meters.
(iii).	In respect of Feeder, describe the property (streets, farms, Agriculture land etc.) through under or over which it passes right up to the premises of customers, whether it crosses over or pass near the lines of DISCO.		All the Feeders are Located within respective consumer premises. Feeders/Power Cables do not cross over or pass near any DISCO's line.
(iv).	Whether owned by LEPL, the BPC or DISCO (deal with each Feeder Separately).		All the Feeders are owned by the respective BPCs.
	(a).	If owned by DISCO, please furnish particulars of contractual arrangement.	N/A
	(b).	Operation and Maintenance responsibility for Feeder.	Operation and Maintenance of the Feeders is the responsibility of the BPCs.
(v).	Whether connection with network of DISCO exists (whether active or not), if yes, provide details of connection arrangements (both technical and contractual).		No
(vi).	Any other network information deemed relevant for disclosure to or consideration by the Authority.		N/A

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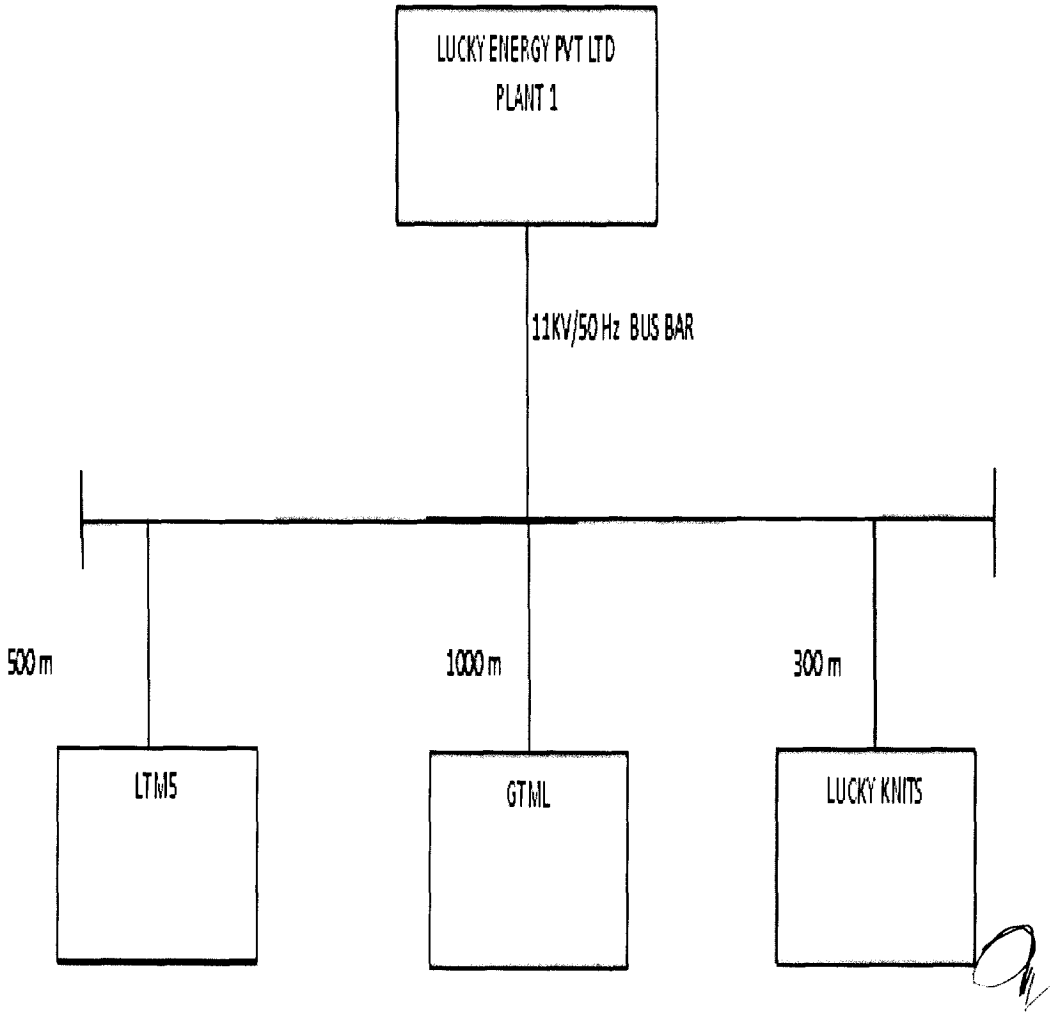
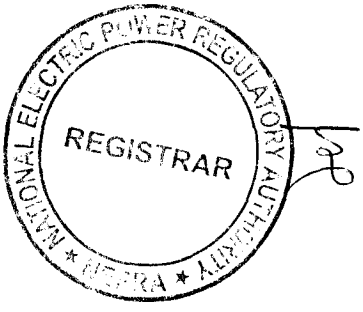
Block Diagram of Distribution Network for Supply of Electric Power to the BPCs from Plant-I of the Licensee (i.e. LEPL)





Information Regarding the BPC to be supplied from Plant-II of the Licensee i.e. LEPL

(i).	No. of BPCs		One (01)
(ii).	Name of BPCs		Lucky Textile Mills Ltd. No. 1 (LTML-1)
(iii).	Location of each BPC (distance and/or identity of premises)		Plot L-8, Block-21, FB Area, Karachi
(iv).	Contracted Capacity and Load Factor of BPC.		0.90 MW MW/90%
(v).	Specify Whether		
	(a).	The BPC is an associate undertaking of the LEPL-If yes, specify percentage. ownership of equity;	Yes-The BPC is an associate undertaking of LEPL with common directorship.
	(b).	There are common directorships;	Yes.
	(c).	Either can exercise influence or control over the other.	Yes.
(vi).	Specify nature of contractual relationship.		
	(a).	Between the BPCs and LEPL.	The BPC is an associated undertaking of LEPL
	(b).	Between the BPCs and DISCO.	Nil
(vii).	Any other network information deemed relevant for disclosure to or consideration by the Authority.		N/A.

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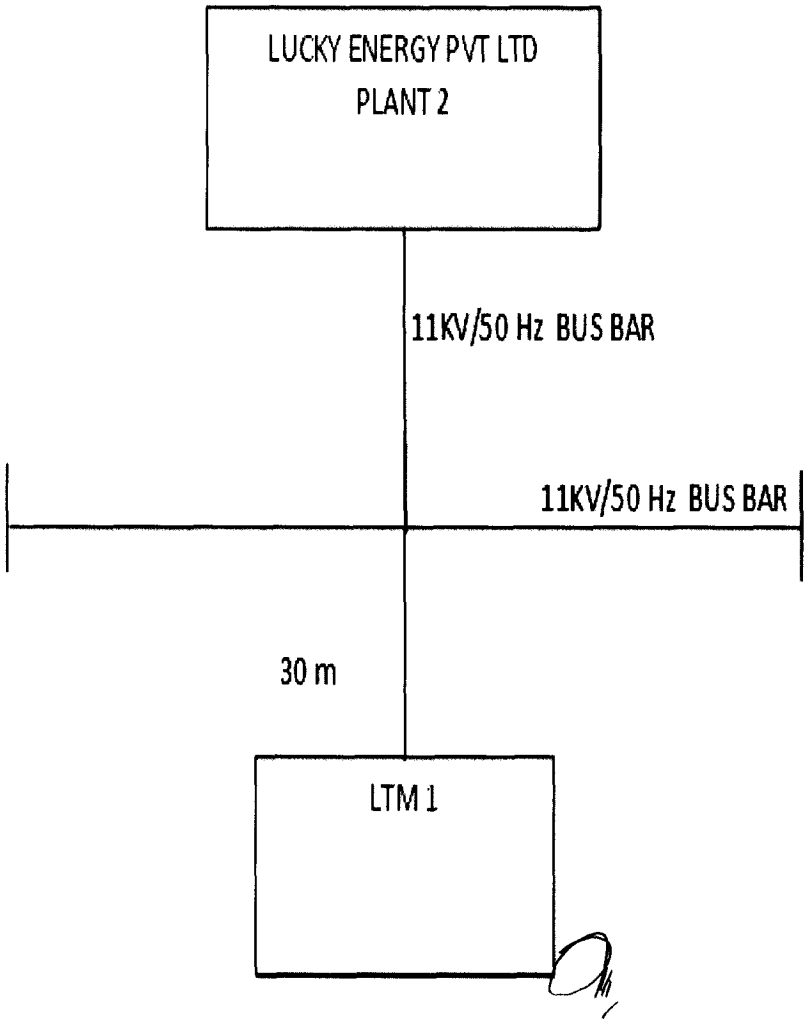
Information Regarding Distribution Network for Supply of Electric Power to the BPC from Plant-II of the Licensee (i.e. LEPL)

(i).	No. of Feeder(s).		One (01)
(ii).	Length of Feeder		30 Meters.
(iii).	In respect of Feeder, describe the property (streets, farms, Agriculture land etc.) through under or over which it passes right up to the premises of customers, whether it crosses over or pass near the lines of DISCO.		The Feeder is Located within respective consumer premises and do not cross over or pass near any DISCO's line.
(iv).	Whether owned by LEPL, the BPC or DISCO (deal with each Feeder Separately).		The Feeder is owned by the BPC.
	(a).	If owned by DISCO, please furnish particulars of contractual arrangement.	N/A
	(b).	Operation and Maintenance responsibility for Feeder.	Operation and Maintenance of the Feeder is the responsibility of the BPC.
(v).	Whether connection with network of DISCO exists (whether active or not), if yes, provide details of connection arrangements (both technical and contractual).		No
(vi).	Any other network information deemed relevant for disclosure to or consideration by the Authority.		N/A

NATIONAL ELECTRIC POWER REGULATORY AUTHORITY ★ NEPRA ★ REGISTRAR

Block Diagram of Distribution Network for Supply of Electric Power to the BPC from Plant-II of the Licensee (i.e. LEPL)



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Information Regarding the BPCs to be supplied from Plant-III of the Licensee i.e. LEPL

(i).	No. of BPCs		(03)
(ii).	Name of BPCs		(a). Lucky Textile Mills Ltd. No. 2 (LTML-2) (b). Lucky Knits (Pvt.) Limited No. 1 (LKPL-1) (c). Lucky Land Mark (Pvt.) Limited (LLMPL)
(iii).	Location of each BPC (distance and/or identity of premises)		(a). LTML-2: Plot L-3, Block 21, FB Area, Karachi. (b). LKPL-1: Plot L-3, Block 21, FB Area, Karachi. (c). LLMPL: Plot L-3, Block 21, FB Area, Karachi.
(iv).	Contracted Capacity and Load Factor of BPCs.		(a). LTML-2: 01.50 MW/90% (b). LKPL-1: 00.70 MW/90% and (c). LLMPL: 09.00 MW/90%
(v).	Specify Whether		
	(a).	The BPC is an associate undertaking of the LEPL-If yes, specify percentage. ownership of equity;	Yes-The BPCs are associate undertakings of LEPL with common directorship.
	(b).	There are common directorships;	Yes.
	(c).	Either can exercise influence or control over the other.	Yes.
(vi).	Specify nature of contractual relationship.		
	(a).	Between the BPCs and LEPL.	The BPCs are associated undertakings of LEPL
	(b).	Between the BPCs and DISCO.	Nil
(vii).	Any other network information deemed relevant for disclosure to or consideration by the Authority.		N/A.

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Information Regarding
Distribution Network for Supply of Electric Power to the BPCs from Plant-III of the Licensee (i.e. LEPL)

(i).	No. of Feeder(s).		(a). LTML-2: 01 (b). LKPL-1: 01 (c). LLMPL: 04
(ii).	Length of Feeder		(a). LTML-2: 250 Meters (b). LKPL: 100 Meters and (c). LLMPL: 100 Meters each.
(iii).	In respect of Feeder, describe the property (streets, farms, Agriculture land etc.) through under or over which it passes right up to the premises of customers, whether it crosses over or pass near the lines of DISCO.		All the Feeders are located within respective consumer premises. Feeders/Power Cables do not cross over or pass near any DISCO's line.
(iv).	Whether owned by LEPL, the BPC or DISCO (deal with each Feeder Separately).		All the Feeders are owned by the respective BPCs.
	(a).	If owned by DISCO, please furnish particulars of contractual arrangement.	N/A
	(b).	Operation and Maintenance responsibility for Feeder.	Operation and Maintenance of the Feeders is the responsibility of the BPCs.
(v).	Whether connection with network of DISCO exists (whether active or not), if yes, provide details of connection arrangements (both technical and contractual).		No
(vi).	Any other network information deemed relevant for disclosure to or consideration by the Authority.		N/A

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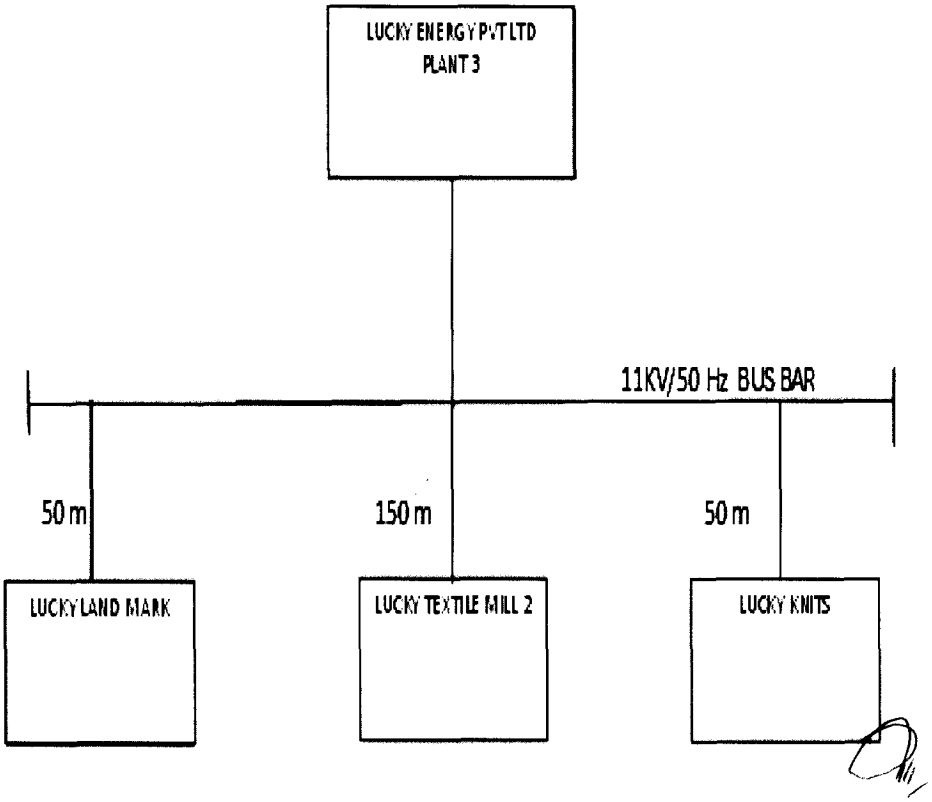
Block Diagram of Distribution Network for Supply of Electric Power to the BPC from Plant-III of the Licensee (i.e. LEPL)



Information Regarding the BPC to be supplied from Plant-IV of the Licensee (i.e. LEPL)

(i).	No. of BPCs		One (01)
(ii).	Name of BPCs		Lucky Textile Mills Ltd. No. 3 (LTML-3)
(iii).	Location of each BPC (distance and/or identity of premises)		A-8/C, S. I. T. E., Karachi.
(iv).	Contracted Capacity and Load Factor of BPC.		2.43 MW MW/90%
(v).	Specify Whether		
	(a).	The BPC is an associate undertaking of the LEPL-If yes, specify percentage. ownership of equity;	Yes-The BPC is an associate undertaking of LEPL with common directorship.
	(b).	There are common directorships;	Yes.
	(c).	Either can exercise influence or control over the other.	Yes.
(vi).	Specify nature of contractual relationship.		
	(a).	Between the BPCs and LEPL.	The BPC is an associated undertaking of LEPL
	(b).	Between the BPCs and DISCO.	Nil
(vii).	Any other network information deemed relevant for disclosure to or consideration by the Authority.		N/A.

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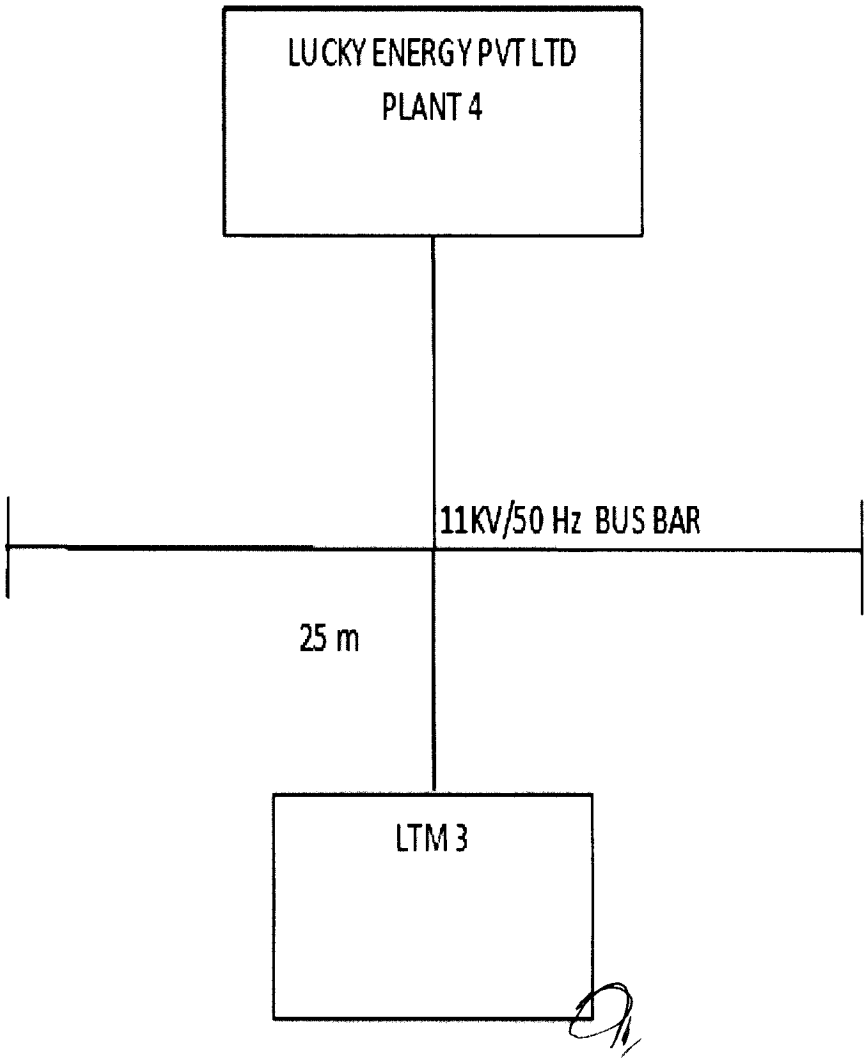
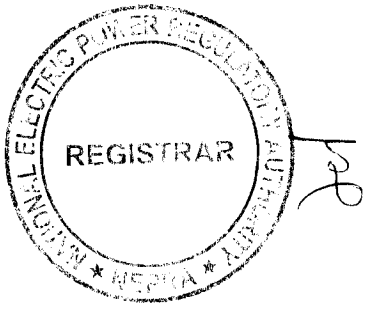
Information Regarding
Distribution Network for Supply of Electric Power to the BPC from Plant-IV of the Licensee (i.e. LEPL)

(i).	No. of Feeder(s).		One (01)
(ii).	Length of Feeder		100 Meters.
(iii).	In respect of Feeder, describe the property (streets, farms, Agriculture land etc.) through under or over which it passes right up to the premises of customers, whether it crosses over or pass near the lines of DISCO.		The Feeder is located within the consumer premises and do not cross over or pass near any DISCO's line.
(iv).	Whether owned by LEPL, the BPC or DISCO (deal with each Feeder Separately).		The Feeder is owned by the BPC.
	(a).	If owned by DISCO, please furnish particulars of contractual arrangement.	N/A
	(b).	Operation and Maintenance responsibility for Feeder.	Operation and Maintenance of the Feeder is the responsibility of the BPC.
(v).	Whether connection with network of DISCO exists (whether active or not), if yes, provide details of connection arrangements (both technical and contractual).		No
(vi).	Any other network information deemed relevant for disclosure to or consideration by the Authority.		N/A

NATIONAL ELECTRIC POWER REGULATORY AUTHORITY ★ NEPRA ★ REGISTRAR

Block Diagram of Distribution Network for Supply of Electric Power to the BPC from Plant-III of the Licensee (i.e. LEPL)





SCHEDULE-II
Modified/Revised

Installed/ISO Capacity (MW), De-Rated Capacity at Mean Site Conditions (MW), Auxiliary Consumption (MW) and the Net Capacity at Mean Site Conditions (MW) of the Generation Facilities of the Licensee is given in this Schedule.

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SCHEDULE-II

Sr. No.	Description	Plant-I	Plant-II	Plant-III	Plant-IV	Total
1.	Installed Capacity (MW) Gross ISO	30.65	1.51	21.5	2.915	56.575
2.	De-rated Capacity (MW) at Mean Site Conditions	30.65	1.51	21.5	2.915	56.575
3.	Auxiliary Consumption (MW)	1.5	0.06	0.5	0.198	2.258
4.	Net Capacity of the Plant at Mean Site Conditions	29.15	1.45	21	2.717	54.317

Note

All the above figures are indicative as provided by the Licensee. The Net Capacity available to BPCs for dispatch will be determined through procedure(s) contained in the Bi-lateral Agreement(s) or any other applicable document(s).

NATIONAL ELECTRIC POWER REGULATORY AUTHORITY ★ NEPRA ★ REGISTRAR

Authorization
by National Electric Power Regulatory Authority (NEPRA) to Lucky Energy Private Limited (LEPL)

Incorporated under the Companies Ordinance, 1984
Under Certificate of Incorporation

No. K-04740, Dated July 24, 1993

NEPRA GENERATION LICNCE No. SGC/30/2005
For
Sale to Bulk Power Consumer(s)

Pursuant to Section-21 of the NEPRA Act and Rule-7 of the NEPRA Licensing (Generation) Rules, 2000, the Authority hereby authorizes LEPL (the Licensee) to engage in Second-Tier Supply Business, limited to the following consumer(s), also mentioned in Schedules-I of the Generation Licence No. SGC/30/2005.

(A). Lucky Energy (Private) Limited (Plant-I)

(a). Gadoon Textile Mills Limited;
(b). Lucky Textile Mills Limited No. 5;
(c). Lucky Knits (Pvt.) Limited, Unit-2.

(B). Lucky Energy (Private) Limited (Plant-II)

(a). Lucky Textile Mills Limited No. 1;

(C). Lucky Energy (Private) Limited (Plant-III)

(a). Lucky Textile Mills Limited No. 2;
(b). Lucky Knits (Pvt.) Limited Unit-1;
(c). Lucky Land Mark (Pvt.) Limited.

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(D). Lucky Energy (Private) Limited (Plant-IV)

(a). Lucky Textile Mills Limited No. 3

Authority

Masood ul Hasan Naqvi 15/1/18
(Member)

Himayat Ullah Khan
(Member)

Saif Ullah Chattha
(Member/Vice Chairman)
16.1.2018

Tariq Saddozai
(Chairman)

NATIONAL ELECTRIC POWER REGULATORY AUTHORITY
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