

# National Electric Power Regulatory Authority Islamic Republic of Pakistan

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

No. NEPRA/R/ADG(Tariff)TRF-100/MFPA/ 19024-39

December 06, 2024

1.	Chief Executive Officer, Faisalabad Electric Supply Company Ltd. (FESCO), Abdullahpur, Canal Bank Road Faisalabad	2.	Chief Executive Officer, Gujranwala Electric Power Company Ltd. (GEPCO), 565/A, Model Town, G.T. Road, Gujranwala
3.	Chief Executive Officer, Hyderabad Electric Supply Co. Ltd. (HESCO), WAPDA Offices Complex, Hussainabad, Hyderabad	4.	Chief Executive Officer Islamabad Electric Supply Co. Ltd. (IESCO), Street # 40, Sector G-7/4, Islamabad.
5.	Chief Executive Officer, Lahore Electric Supply Company Ltd. (LESCO), 22-A, Queens Road, Lahore	6.	Chief Executive Officer, Multan Electric Power Company Ltd. (MEPCO), MEPCO Headquarter, Khanewal Road, Multan
7.	Chief Executive Officer, Peshawar Electric Supply Company Ltd. (PESCO), WAPDA House, Shami Road, Sakhi Chashma, Peshawar	8.	Chief Executive Officer, Quetta Electric Supply Company Ltd. (QESCO), Zarghoon Road, Quetta
9.	Chief Executive Officer, Sukkur Electric Power Company Ltd. (SEPCO), Administration Block, Thermal Power Station, Old Sukkur	10.	Chief Executive Officer, Tribal Areas Electric Supply Company Ltd. (TESCO), Room No. 213, 1st Floor, WAPDA House, Shami Road, Sakhi Chashma, Peshawar

Subject: Decision of the Authority in the matter of Fuel Charges Adjustment for the month of October 2024 for XWDISCOs along with Notification Thereof

Enclosed please find herewith a copy of the Decision of the Authority along with Annex-I, Decision of Mr. Mathar Niaz Rana (nsc), Member (NEPRA) and Additional Note of Mr. Rafique Ahmed Shaikh, Member (NEPRA) (total 13 Pages) regarding adjustment in fuel charges in respect of Ex-WAPDA Distribution Companies for the month of October 2024 and its Notification i.e. S.R.O. 2026 (I)/2024 dated December 06, 2024.

2. XWDISCOs are directed that while charging the fuel charges adjustment from their consumers, the Order of the Honorable Court(s), if any, be kept in mind and ensure compliance with the Order(s) of the Court(s), whatsoever, in this regard. In case of non-compliance of Court(s) Order(s) the concerned DISCO shall be held responsible for violating/defying the orders of the Honorable Court(s).

Enclosure: [Decision along with Notification is also available on NEPRA's website]

(Wasim Anwar Bhinder)

## Copy to:

- 1. Secretary, Ministry of Energy (Power Division), 'A' Block, Pak Secretariat, Islamabad
- 2. Secretary, Cabinet Division, Cabinet Secretariat, Islamabad
- 3. Secretary, Ministry of Finance, 'Q' Block, Pak Secretariat, Islamabad
- 4. Member (Power), WAPDA, WAPDA House, Shahrah-e-Quaid-e-Azam, Lahore
- 5. Managing Director, NTDC, 414 WAPDA House, Shahrah-e-Quaid-e-Azam, Lahore
- 6. Chief Executive Officer, Central Power Purchasing Agency Guarantee Limited (CPPA-G), Shaheen Plaza, 73-West, Fazl-e-Haq Road, Islamabad



## DECISION OF THE AUTHORITY IN THE MATTER OF FUEL CHARGES ADJUSTMENT FOR THE MONTH OF OCTOBER 2024 FOR EX-WAPDA DISCOS

- 1. Pursuant to the provisions of Section 31(7) of the Regulation of Generation, Transmission and Distribution of Electric Power Act 1997, (NEPRA Act) read with the mechanism/ formula determined by the Authority in the tariff determinations for Ex-WAPDA DISCOs notified in the official Gazette, the Authority has to make adjustments in the approved tariff on account of any variations in the fuel charges on a monthly basis.
- 2. In order to make adjustments in the approved tariff of the Ex-WAPDA DISCOs due to variations in the fuel charges for the month of October 2024, a request was filed by CPPA-G vide letter dated November 14, 2024. CPPA-G has worked out the fuel cost for the FCA claim for October 2024 as under:

Actual Fuel Charges Component for October 2024	Rs.9.2593/kWh
Corresponding Reference Fuel Charges Component	Rs.10.2752/kWh
Net Fuel Price Variation for the month of October 2024 Decrease	(Rs.1.0159/kWh)

- 3. The Authority has reviewed the request/information provided by CPPA-G seeking monthly fuel cost adjustment (FCA). From the perusal of the information so provided by CPPA-G, the actual pool fuel cost for the month of October 2024, as claimed by CPPA-G, is Rs.9.2593/kWh, against the reference fuel cost component of Rs.10.2752/kWh as indicated in the Annexure-IV of the notified consumer-end tariff of Ex-WAPDA DISCOs for the FY 2024-25. The actual fuel charges, as claimed by CPPA-G, for the October 2024 decreased by (Rs.1.0159/kWh) (Annex-I) as compared to the reference fuel charges.
- 4. Notwithstanding the fact that the monthly adjustment on account of fuel charges variation is made in pursuance of the provisions of section 31(7) of the NEPRA Act, as well as on the basis of a mechanism/formula already determined by the Authority in its annual tariff determinations for Ex-WAPDA DISCOs, yet in order to meet the ends of natural justice and to arrive at an informed decision, the Authority decided to conduct a hearing in the matter. The advertisement for hearing along-with salient features and details of the proposed adjustments, in the approved tariff, were published in newspapers on November 16, 2024 and also uploaded on NEPRA website for information of all concerned stakeholders.
- 5. The Authority conducted the hearing in the matter on November 26, 2024 at NEPRA Tower, Ataturk Avenue (East), G-5/1, Islamabad and online through Zoom. The date of hearing was mentioned in the advertisement published in newspapers and also uploaded on NEPRA's website, whereby participation in the hearing and filing of comments/ objections from any interested/affected person were invited. Separate notices were also sent to the interested / affected parties.
- 6. On the scheduled hearing date, representatives of CPPA-G, DISCOs, NTDC along-with its SO/NPCC team, general public and Media were present. However, no representative was present from Power Planning & Monitoring Company (PPMC), Sui Southern Gas Company Limited (SSGCL), Sui Northern Gas Pipelines Limited (SNGPL) and Ministry of Finance despite serving of hearing notice.
- 7. Representative of CPPA-G presented the case before the Authority. While explaining the source wise generation, representative of CPPA-G stated that there was slightly higher generation from Hydro but slightly lower generation from Local Coal as compared to generation assumed in reference tariff. It was further submitted that there was not much

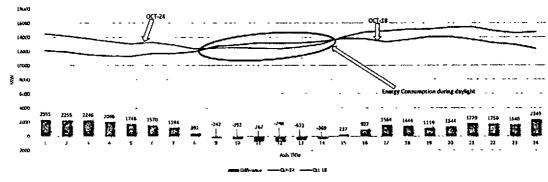




variation in the actual fuel prices vis a vis reference value. Total generation for the month October 2024 increased by around 1.6% as compared to the reference generation assumed in the base tariff. The following utilization factors for gas and coal-based power plants for the instant month were presented during the hearing;

		٥.
Power Producer	Energy KWh	Plant Factor
China Power Hub Generation company	133,344,500	14%
Huaneng Shandong Ruyi Energy	287,567,700	31%
Port Qasim Electric Power Company	330,480,300	36%
Lucky Electric Power Company	151,155,400	33%
Coal-Imported	902,547,900	28%
Engro Powergen Thar (Pvt) Limited	428,046,400	96%
Thar Energy Limited	195,759,600	88%
Thar Coal Block-1 Power Generation	857,732,300	95%
ThalNova Power Thar (Pvt.) Ltd	36,708,200	16%
Coal- Local	1,518,246,500	85%
Gas		
Liberty Daharki Power Limited	102,119,900	62%
Uch Power Ltd.	138,264,000	34%

8. The Representative of NTDC/NPCC submitted that year-on-year basis the generation has increased by 6.77%. In compliance with the Authority's direction, the SO also presented generation/demand pattern since 2018, to provide insight for demand fluctuation and dip due to induction of solar as under;



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oct-j8	9530	3666	38.4%
oc; 24	10220	3616	35%

9. It was further submitted that national area-weighted rainfall for October 2024 was 15.0 mm, which was near average, with a slight -8% negative anomaly. This means rainfall was close to the expected amount but slightly drier than usual. It was further submitted that mean national temperature for October was 26.07°C, which was +2.48°C higher than the country average of 23.59°C. The mean maximum temperature was 33.32°C, which was +1.80°C higher than the country average.

Mr. Amir Sheikh, a commentator, inquired regarding variation between the current month cost and previous adjustment claims of bagasse based power plants. CPPA-G responded that







the previous adjustment has been claimed as per the Authority decisions dated 06.08.2024 and 08.08.2024, while the current month cost was based on the claimed amount by the power plant, which was lower than the Authority decision.

11. The Authority observed that while submitting the monthly FCA request, CPPA-G and NTDC/NPCC certifies that;

## a) 2002 Power Policy Plants

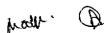
- i. All purchases have been made from Generation Companies having valid generation License issued by NEPRA.
- ii. Invoices of all Electricity Purchases have been processed in accordance with the rates, terms & conditions as determined by NEPRA. Payments related to periodical adjustments are also made as per decision of NEPRA.
- iii. The above statement is true, based on facts and from verifiable documentary evidence. In case of any deviation / variation observed if not rectified at later stage, CPPA-G will be responsible for the consequences arising out of any misstatement under NEPRA Act and its Rules & Regulations.

## b) 1994 Power Policy Plants (HUBCO Inclusive)

- i. All purchases have been made from IPPs under 1994 Policy, including HUBCO & Chasnupp and excluding Tavanir, having valid generation license issued by NEPRA.
- ii. Invoices of all Electricity Purchases have been made strictly in accordance with the rates, terms & conditions as stipulated in the respective Power Purchase Agreements.
- iii. All payments to IPPs are being made after observing all formalities provided in the respective Power Purchase Agreements.
- iv. All purchases have been made in accordance with the Power Purchase Agreement
- v. The above statement is true, based on facts and from verifiable documentary evidences. In case of any deviation / variation observed if not rectified at later stage, CPPA-G will be responsible for the consequences arising out of any misstatement under NEPRA Act and its Rules & Regulations.

## c) Power Plants Operations

- i. It is certified that Merit Order was followed as defined under section 2(I)(x) of the NEPRA Licensing (Generation) Rules, 2000, while operating power plants in its fleet during month of October 2024.
- ii. Partial Loading of power plants strictly in accordance with the provision of their respective Power Purchase Agreement and the plants were operated on partial load as per system load demand variations and for fuel conversation where needed.
- 12. Accordingly for the purpose of instant FCA, the information along-with certification given by CPPA-G has been relied upon. In case of any variation, error, omission or misstatement found out at a later stage, CPPA-G shall be responsible and the same would be adjusted in the subsequent monthly fuel charges adjustment.
- 13. The Authority, observed that CPPA-G has purchased energy of 42.38 GWh from Tavanir Iran in October 2024 at a cost of Rs.1,073.5 million, however, contract between CPPA-G and







Tavanir Iran for import of Power up-to 104 MW has expired on December 31, 2021. In view thereof, the current cost and previous adjustments, of electricity purchased from Tavanir Iran is being allowed strictly on provisional basis, subject to its adjustment once the Authority decides the extension in the contract between CPPA-G and Tavanir Iran or otherwise. The cost being allowed on provisional basis is to avoid piling up of the cost and one time burdening of the consumers in future.

- 14. CPPA-G also requested net positive amount of Rs.1,090.557 million as previous adjustments.
- 15. Regarding previous adjustment of Rs.1.7 billion for bagasse-based power plants, the Authority vide its decisions dated 06.08.2024 & 08.08.2024, revised the Fuel Cost Component of Bagasse based power plants from FY 2018 to FY 2024, pursuant to the Authority decision dated 07.02.2024, as detailed below:

Puel Price Components from Oct 01, 2018 to Sep 30, 2024

Period	Cost component (FCC)
	Rs. /kWh
w.c.f. 1st October, 2018 to 30th September 2019	8.0368
w.e.f. 1st October, 2019 to 30th September 2020	9.2262
w.e.f. 1st October, 2020 to 30th September 2021	9,8025
w.c.f. 1st October, 2021 to 30th September 2022	11.3187
w.c.f. 1st October, 2022 to 30th September 2023	11.8846
w.e.f. 1st October, 2023 to 30th September 2024	12.4788

- 16. Pursuant to the Authority's aforementioned decisions, CPPA-G requested adjustment of Rs.1.784 billion, for different power plants, based on the claims submitted by these power plants and the amounts verified by CPPA-G. This claimed amount includes Rs.745.9 million for JDW-III and Rs.1,037 million for RYK.
- 17. Regarding previous adjustment claims of bagasse-based power plants, the Authority obtained details of actual payments made by CPPA-G to different bagasse-based power plants. As per the details submitted by CPPA-G, an amount of Rs.1,696 million has been verified and paid as of November 19, 2024 out of the claimed amount of Rs.1.784 billion. In view thereof, the Authority has decided to allow the amount of Rs.1.696 billion in the instant FCA.
- 18. Regarding previous adjustments of negative Rs.15.487 million pertaining to Saphire, positive Rs.4.02 million pertaining to Halmore, negative Rs.0.46 million pertaining to Uch-II, positive Rs.156.89 million pertaining to Engro Thar, negative Rs.214 million pertaining to QATPL, negative Rs.265 million pertaining to Haveli Bahadur Shah, negative Rs.248.7 million pertaining to Baloki, negative Rs.383.6 million pertaining to Lucky Electric, positive Rs.228 million pertaining to Punjab Thermal and negative Rs.2.89 million pertaining to Thar Coal Block I, the same are under technical verification of the Authority. Therefore, the Authority has decided to provisionally account for these adjustments in the instant FCA subject to adjustment, if required, once technical verification is completed.
- 19. Accordingly, the following total adjustments have been included in the instant FCA:



Maller



Power Producers	Request	Allowed
Total	1,090,557,994	1,002,477,225
Fauji Kabirwala	(13)	(13)
Uch	(3,233)	(3,233)
Liberty	(573,001,616)	(573,001,616)
Karachi Nuclear Power Plant-Unit-2	198,263,516	198,263,515
Karachi Nuclear Power Plant-Unit-3	387,536,605	387,535,605
Tavank fran	(112,329,957)	(112,329,957)
Mishat Power	887,403	887,415
Foundation Power	(3,836)	(3,836)
Orient	(34,892)	(34,892)
Engre Energy	(9,135,829)	(9,136,829)
Suphire Power	15,478,868	15,478,868
Hubco Narowal	142,655	142,674
Liberty Power	1,926,115	1,926,115
Halmore	6,870,507	6,870,507
Uch-II	(463,396)	(463,396)
JDW-IK	745,905,625	745,905,625
RYK	1,037,842,224	949,761,426
Engro PowerGen Than TPS	156,897,967	156,897,967
QATPL	(214,238,474)	(214,238,474)
Havel Bahadur Shah	(265,293,194)	(265,293,194)
Baloki	(248,755,573)	(245,755,573)
Port Qasim	130,962,771	130,962,771
Lucky Electric Power Company Limits	(353,611,157)	(383,611,157)
Punjab Thermal Power	218,884,282	218,684,282
Thar Energy Limited	(1,275,633)	(1,275,633)
Thar Coal Block-1 Power Generation	(2,892,378)	(2,892,378)
ThatNova Power Thar	(367)	(367)

- 20. The Authority hereby directs CPPA-G to provide the technically/financially verified data of each generation company pertaining to previous month along-with its next monthly FCA request, in order to ensure that any required adjustments are made in a timely manner.
- 21. NTDCL, reported provisional T&T losses of 226.649 GWh i.e. 2.116%, based on energy delivered on NTDCL system during October 2024. NTDC in addition also reported T&T losses of 23.180 GWh i.e. 2.842%, for PMLTC (HVDC) line. NTDCL is allowed T&T losses of 2.639% only at 500KV and 220 KV network. For PMLTC (HVDC) is allowed T&T losses of maximum up-to 4.3%.
- 22. Accordingly, for the month of October 2024, T&T losses of 249.83 GWh have been verified for NTDCL system only at 500 kV and 220 kV network and PMLTC (HVDC), keeping in view the aforementioned allowed limits of the Authority, which has been included in the instant monthly FCA working.
- 23. CPPA-G, in addition, also provided details regarding net metering units procured by DISCOs. As per the data provided, DISCOs have purchased 97.44 GWh from Net Metering during October 2024.
- 24. Further, CPPA-G also provided data that during October 2024, 21.93 GWh were supplied by power producers having bilateral contracts with DISCOs. Regarding fuel cost of SPPs/CPP it is important to mention that CPPA-G only provided NTDC monthly reading data containing energy supplied by aforementioned SPPs/CPPs to DISCOs, however, no fuel cost has been claimed / provided along-with the FCA data.
- 25. It is pertinent to mention here that while approving the Power Acquisition Requests (PARs) for such SPPs, the Authority also prescribed an adjustment mechanism for indexation of fuel cost component based on prevalent fuel prices. As CPPA-G has not claimed any cost for the energy supplied by SPPs/CPPs, therefore, in order to avoid piling up of costs and one time burdening of consumers, the cost for energy supplied by SPPs during October 2024 has been accounted for based on the reference Fuel cost component as approved by the Authority in the spective PAR of such SPP/CPPs.





- 26. In view of the above discussion, the Authority has calculated the fuel cost for the month of October 2024, after accounting for the aforementioned adjustments, and including costs arising due to application of various factors, as provided in the respective PPAs of the Power Producers as claimed by CPPA-G in its FCA request.
- 27. Based on the aforementioned discussion and in light of the earlier decisions of the Authority, separate FCA of each DISCO after accounting for the energy purchased from CPPA-G, bilateral contracts (Captive, SPPs) and Net metering as part of individual basket of each DISCO has been worked out. However, since a uniform tariff regime is applicable in light NEPRA Act, NE Policy and Plan, therefore, the Authority has also worked out a National Average Uniform monthly FCA to be charged from all the consumers of XWDISCOs.

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cription	Unit	CPPA-G Pool	K-Electric	T&T Loss Diff.	XWDIscos							
gy Procured from CPPA-G Fool Cost ellocated from Peol	GWh Re Min	9,983 92,793	791 7,316	2.11	9,189 84,958							
istual Fuel Cost compound (FCC) f CPPA-G Poul	<b>l</b> u√kWh	9.2453	9.2453	9.2453	9.2453							
scription	Unit	FESCO	<b>G</b> EPCO	HESCO	SEPCO	IESCO	LESCO		MEPCO	MEPCO PESCO	MEPCO PESCO TESCO	MEPCO PESCO TESCO QESCO
gy Procured from CPPA-G Pool	GWL	1,313	955	495	370	911	2,12	- 1				
vergy Procured from Net Metering vergy Procured from SPPs	GWh GWh	6.752	10.276	0,382 5,45	0,149 12,14	29.753	26.274	۱	18.371	11		1 1
otal Energy	GWA	1,319	969	501	343	941	2,147		1,574			
Cost allocated from Pool	Ra. Min	12,136	8,830	4,578	3,425	8,421	19,604	ſ	14,379	14,379 8,723	14,379 8,723 1,128	14,379 8,723 1,128 3,734
el Cost for Energy Procured rough bilateral centracts	Rs. Min		-	11.4	25.4				-	.	·	•
Cotal Fuel Cost	Rs. Min	12,136	8,830	4,589	3,450	8,421	19,404	•	14,379	14,379 8,723	14,379 8,723 1,128	14,379 8,723 1,128 3,734
crual Fuel Cost component (FCC)	Rs./kWk	2,1980	9,1076	9.1605	9.0149	8.9529	9.1322		9,1364	9,1364 9,1935	9,1364 9,1935 9,2445	9,1364 9,1935 9,2445 9,2418
Reference Fire! Cost component (FCC)	Ra./kWh	10,2752	10.2752	10.2752	10.2752	10.2752	10.2752		10 2752			
FCA	Rs /kWh	(1 0772)	(1 1676)	(I 1147)	(1 2603)	(1 3223)	(1 1431)	(1)	13K9)	1369) (1.0818)	1389) (1.0818) (1.0307)	13K9) (1 0818) (1 0307) (1 0335)

- 28. CPPA-G is directed to develop a proper mechanism for Inter DISCO settlement of FCA worked for each XWDISCOs and the FCA charged from consumers after consultation with DISCOS, in order to ensure proper accounting of energy and cost of each DISCO as per their own basket.
- 29. The Authority, after incorporating the aforementioned adjustments, has reviewed and assessed a National Average Uniform decrease of (Rs.1.1445/kWh) in the applicable tariff for XWDISCOs on account of variations in the fuel charges for October 2024 as under;

Actual National Avg. Uniform FCC for October 2024	Rs.9.1307/kWh
Corresponding Reference Fuel Charge Component	Rs.10.2752/kWh
National Avg. Uniform FCA for October 2024- Decrease	(Rs.1.1445/kWh)

- The Authority has decided that adjustment as referred in the preceding paragraphs;
  - a. Shall be applicable to all the consumer categories except lifeline consumers, domestic consumers consuming up-to 300 units, Electric Vehicle Charging Stations (EVCS), Prepaid electricity consumers of all categories who opted for pre-paid tariff and agriculture Consumers of all the XWDISCOs. It is hereby clarified that negative adjustment on account of monthly FCA is also applicable to the domestic consumers having Time of Use (ToU) meters irrespective of their consumption level.
  - b. Shall be shown separately in the consumers' bills on the basis of units billed to the consumers in the month of October 2024.





- c. XWDISCOs shall reflect the fuel charges adjustment in respect of October 2024 in the billing month of December 2024.
- d. While effecting the Fuel Adjustment Charges, the concerned XWDISCOs shall keep in view and strictly comply with the orders of the courts notwithstanding this order.

## **AUTHORITY**

And wil

Mathar Niaz Rana (nsc) Member

Member

Member

Amina Ahmed Member

Waseem Mukhtar Chairman



B My adhitional mote is attach.

P My decision is allowa projection of 7/12

#### GENTRAL POWER PURCHASHIS ASSENCY (OFFA Energy Presumment Report (Provisional) For the Month of Ortober 1924

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#### CENTRAL POWER PURCHASING ABENCY (CPP Energy Procurement Report (Provisional) For the Month of October 2024

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&.Ne.	Power Producers	Fuet	Energy KMA	Pad Chirgos Rs.	VORM Charges Rs.	(SPP Billing season (Fis.)	Prev. Adjustment in Fuel Cest. (No.)	Prev. Adjustment in VOEM (RL)	Prev. Adjustment in EPP Total Ma.	Supp. Charger	Total Fuel Cost Rs.	Tetal VOSIII Re.	Total Energy Cost (Rt.)
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		GRAND TOTALS:	10,258,480,551	84,084,173,032	6,160,539,907	100,216,712,939	1						

Energy Cost (Rs.)	84,858,173,832	6,160,539,997	100,216,712,939
Cost not chargeable to DISCOs (No.)	1,843,539,842		1,643,639,942
EPP (Chargostic) (Pa.)	82,412,633,058	6,160,539,907	99,573,172,897
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Avg. Rate (Rs.AKVfts)	9,2593	0,6173	9.8766

Reference, Rate (Ru AOVh)	10.2752
PCA Rate Current ments (Re.ASVIII)	[1.6159]





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## <u>DECISION OF MEMBER (TARIFF)</u> <u>FUEL CHARGES ADJUSTMENT (FCA) OF XWDISCOS –</u> <u>MONTH OF OCTOBER 2024</u>

My earlier decision dated 22 October 2024 regarding Fuel Charges Adjustment (FCA) of XWDISCOs for the month of August 2024 is also relevant to this case.

- 2. The FCA claim of CPPA-G amounting to Rs. 1.784 billion for different Bagasse based power plants is based on claims of the Bagasse based power projects on high tariff which reportedly is in the process of downward adjustment after voluntarily negotiation of the Bagasse based power plants with the Government. However, out of Rs 1.784 billion of claimed adjustment by CPPA-G in this regard, the Authority has decided to allow Rs. 1.696 billion to be passed on to the consumers in the current FCA on which I respectfully disagree with my learned colleagues.
- 5. Hence, in my opinion, the amount of Rs. 1.696 billion should not be passed on to the consumers till the time final outcome of the aforementioned voluntarily negotiations is concluded. By not including Rs. 1.696 billion for bagasse-based power projects in the FCA for October 2024, FCA shall further decrease from negative Rs. 1.1445/kWh to negative approximately Rs. 1.32/kWh, thereby adding to the relief to the consumers. On the remaining matters of this case, I agree with the majority's decision.

Mathar Niaz Rana (nsc) Member (Tariff)

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## Note of the Member (Technical) on Monthly FCA - For the Month of October 2024

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I have consistently highlighted the long-standing issues plaguing the power sector, including the continued reliance on inefficient GENCOs, the operation of the 747 MW Guddu power plant in open cycle mode, and the ongoing outage of the NJ power plant. Other critical challenges include the failure to evacuate power from wind energy plants, transmission constraints—especially the inability to transmit cheaper electricity from the south to the north—and poor governance within DISCOs. These persistent inefficiencies have hindered the sector's performance and contributed to rising costs.

Despite NEPRA's continuous efforts as a regulator, including initiating proceedings and imposing fines on power sector entities to improve efficiency, there has been little progress, especially with public sector organizations. This stagnation calls for immediate and decisive action to address the sector's issues comprehensively.

The solution lies in prompt interventions focused on improving efficiency, optimizing resources, and alleviating financial pressures. The recent winter demand initiative presents a positive step, potentially increasing demand and enhancing the utilization of generation and transmission capacities. Optimizing resource usage can help reduce consumer tariffs and stabilize electricity prices. To maximize its benefits, it is essential to closely monitor the results of the initiative and, where feasible, introduce lower-rate time-of-use tariffs.

Additionally, urgent reforms within NTDC are critical to alleviating constraints that are driving up electricity costs. Strengthening project management to minimize cost overruns and improve execution timelines should be a priority. Decommissioning underutilized GENCO plants and expediting repairs at the Guddu 747 MW plant are essential steps to address inefficiencies. Enhancing governance within DISCOs, supported by advanced technology to manage and reduce AT&C losses, is vital. The adoption of ABC conductors, prepaid meters, and the potential restructuring or privatization of larger DISCOs into smaller entities could further improve operational efficiency.

While reviewing the data for the October 2024 FCA proceedings, several specific issues have been identified, as outlined in the annexure attached to this note. Based on these findings, I am of the considered opinion that the cost of inefficiencies should not be passed on to consumers.





## **Annexure to Note of Member (Technical)**

In October 2024, total power generation amounted to 10,262 GWh, against a dependable capacity of 37,069 MW, resulting in an average utilization factor of just 28%. This suboptimal utilization of excessive generation capacity is having a detrimental effect on the sector's overall efficiency. Similarly, the country's thermal power plants, with a dependable capacity of around 20,248 MW, operated at only 41% utilization in October 2024. This underutilization means consumers are effectively paying for 59% of unutilized capacity, thereby increasing the per-unit cost of electricity.

The open cycle operation of the Guddu 747 MW plant has further compounded these issues. Operating in open cycle mode escalates generation costs by 1.5 times compared to combined cycle operation. Had the plant been running in combined cycle mode, over Rs. 550 million could have been saved in October 2024 alone. Additionally, reduced generation at Guddu forced reliance on costlier plants, leading to a loss of over Rs. 2 billion. As a result, the cumulative loss for FY 2024-25 due to open cycle operation has reached Rs. 2.5 billion, and the total loss from the increased reliance on expensive plants has exceeded Rs. 18 billion.

Similarly, the non-generation of power at the 969 MW Neelum Jhelum (NJ) plant in October 2024 resulted in an increased reliance on costlier plants, leading to a loss of over Rs. 2 billion. The cumulative loss for FY 2024-25 due to higher-cost generation has now reached Rs. 19.4 billion. The non-production of energy from both Guddu and Neelum Jhelum plants is also placing a significant burden on the national exchequer, adding to foreign exchange pressures.

In addition to generation inefficiencies, the underutilization of the HVDC line is further negatively affecting electricity consumers. In October 2024, the average utilization of the HVDC line was only 27%, while consumers continued to pay for the full 100% capacity. Furthermore, transmission system constraints caused a financial impact of Rs. 212 million in October 2024, contributing to a total financial impact of Rs. 7.9 billion for the first four months of FY 2024-25.

On a positive note, electricity generation in October 2024 increased by 7% compared to October 2023, rising from 9,572 GWh to 10,262 GWh. However, generation decreased by 18% compared to September 2024, from 12,487 GWh to 10,262 GWh. Although electricity sales in October 2024 increased by 75 GWh compared to the reference value, the total reduction in electricity sales during the first four months of FY 2024-25, compared to the projected figures, amounted to 5,113 GWh. This shortfall is expected to negatively impact the quarterly FCA adjustments.

The PLAC for October 2024 amounted to Rs. 3.116 billion, bringing the cumulative PLAC for FY 2024-25 to Rs. 17.8 billion, further highlighting the financial pressures faced by the power sector. Immediate action is required to address these inefficiencies, optimize plant utilization, and stabilize the financial health of the sector.





## National Electric Power Regulatory Authority



## **NOTIFICATION**

Islamabad, the 06th day of December, 2024

S.R.O. (I)/2024: – Pursuant to amendment in Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (NEPRA Act) through Regulation of Generation, Transmission and Distribution of Electric Power (Amendment) Act 2011 (Act No. XVIII of 2011), amended subsequently through Act No. XIV of 2021, the National Electric Power Regulatory Authority has been mandated to make the adjustments in the approved tariff on account of any variation in the fuel charges and notify the same in the official Gazette.

2. In exercise of power conferred by fourth proviso of sub-section 7 of Section 31 of NEPRA Act, the Authority has made the following adjustment on account of variation in fuel charges for the month of October 2024 in the approved tariff of Ex-WAPDA Distribution Companies (XWDISCOs):

Actual National Avg. Uniform FCC for October 2024	Rs.9.1307/kWh
Corresponding Reference Fuel Charge Component	Rs.10.2752/kWh
National Avg. Uniform FCA for October 2024 - Decrease	(Rs.1.1445/kWh)

- 3. The Authority has decided that adjustment (Rs.1.1445/kWh) as referred in the preceding paragraph;
  - a. Shall be applicable to all the consumer categories except lifeline consumers, domestic consumers consuming up-to 300 units, Electric Vehicle Charging Stations (EVCS), Prepaid electricity consumers of all categories who opted for pre-paid tariff and agriculture Consumers of all the XWDISCOs. It is hereby clarified that negative adjustment on account of monthly FCA is also applicable to the domestic consumers having Time of Use (ToU) meters irrespective of their consumption level.
  - b. Shall be shown separately in the consumers' bills on the basis of units billed to the consumers in the month of October 2024.
  - c. XWDISCOs shall reflect the fuel charges adjustment in respect of October 2024 in the billing month of **December 2024**.
  - d. While effecting the Fuel Adjustment Charges, the concerned XWDISCOs shall keep in view and strictly comply with the orders of the courts notwithstanding this order.

(Wasim Anwar Bhinder)

Registrar