

National Electric Power Regulatory Authority

NOTIFICATION



Islamabad, the 09<sup>th</sup> day of May, 2025

S.R.O. 769 (I)/2025.- In pursuance of Proviso (ii) to Sub-Section 7 of Section 31 of the Regulation of Generation, Transmission and Distribution of Electric Power Act, 1997 (XL of 1997), NEPRA hereby notifies complete Decision of the Authority along-with attached **Annexure-A** in the matter of Requests filed by XWDISCOs for Periodic Adjustment in Tariff for the 3<sup>rd</sup> Quarter of FY 2024-25 already intimated to the Ministry of Energy (Power Division) on May 09, 2025. The Authority has decided to allow **negative** quarterly adjustments of **Rs.52,603 million** pertaining to the 3<sup>rd</sup> quarter of the FY 2024-25, in a period of **03 months** i.e. **May 2025 to July 2025**, at a uniform rate of **negative Rs.1.5538/kWh**, to be applicable to all consumer categories, except lifeline consumers and prepaid consumers.

2. In view of relevant provisions of NEPRA Act, NE Policy and Policy Guidelines issued by the Federal Government, the Authority has decided to allow the application of instant quarterly adjustments on the consumers of K-Electric as well, with the same applicability period. Accordingly, the instant quarterly adjustment of negative **Rs.1.5538/kWh** shall also be charged from the consumers of K-Electric except life line and prepaid consumers, to be recovered in a period of 03 months i.e. **May 2025 to July 2025**.

3. In case any bills for the applicable period of the instant adjustment, are issued before the notification of this decision, the same may be applied in subsequent month.

4. While effecting the Quarterly Adjustments, the concerned DISCOs shall keep in view and strictly comply with the orders of the courts notwithstanding this order.

5. In view of the technical and financial challenges faced by Distribution Companies (DISCOs) arising from the growing penetration of Distributed Generation (DG), as well as the misalignment between actual system peak and off-peak demand and the designated peak/off-peak hours used in consumer-end tariff determinations, the Authority directs all DISCOs to undertake a comprehensive study as detailed below, to thoroughly examine these issues and be submitted within four months for the Authority's consideration.

- Comprehensive study on the impact of existing time-of-use (ToU) tariff timings and proposed measures for aligning demand with evolving load patterns
- Comprehensive assessment of the financial and technical impacts of distributed solar photovoltaic (PV) integration on distribution utility operations and infrastructure

6. The Authority further directs all DISCOs to jointly develop, through mutual consultation, a uniform Terms of Reference (ToR) to carry out the above studies and submit the same to NEPRA within two weeks of the issuance of this determination for the Authority's approval.

[Case No. NEPRA/TRF-100]

*Wasim Anwar Bhinder*  
(Wasim Anwar Bhinder)  
Registrar



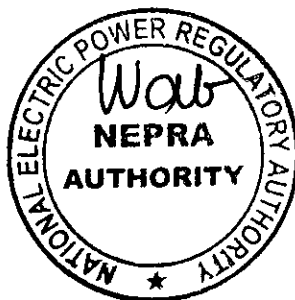
**DECISION OF THE AUTHORITY IN THE MATTER OF REQUESTS FILED BY XWDISCOs FOR  
PERIODIC ADJUSTMENT IN TARIFF FOR THE 3<sup>rd</sup> QUARTER OF FY 2024-25**

1. The Authority determined Consumer-end Tariff for FY 2023-24, including Power Purchase Price (PPP) reference for XWDISCOs on July 14, 2023, and intimated the same to the Federal Government. The Federal Government, against the aforementioned determinations/decisions, filed Motion, under Section 7 and 31 of the NEPRA Act 1997 read with Rule 17 of the NEPRA (Tariff Standards and Procedure) Rules, 1998 for recommendation of uniform consumer end tariff. The said Motion was decided by the Authority on July 25, 2023 and was subsequently notified by the Federal Government w.e.f. July 01, 2023.
2. XWDISCOs, in line with the NEPRA Act and prescribed quarterly adjustment mechanism as per their tariff determinations, filed adjustment requests on account of variation in PPP, including impact of T&D losses etc., for the 3<sup>rd</sup> quarter of the FY 2024-25 i.e. from January to March 2025, as summarized below;

Description	FESCO	GEPSCO	HESCO	IESCO	LESCO	MEPCO	PESCO	QESCO	SEPCO	TESCO	TOTAL
Capacity Charges	(4,254)	(6,483)	(3,841)	1,895	(7,824)	(14,437)	(2,539)	(2,289)	(3,317)	(4,035)	(47,124)
Variable O&M	117	75	39	72	185	93	156	61	10	21	829
UoSC & MoF	453	(27)	183	502	414	(403)	610	211	(22)	(114)	1,807
Impact of T&D Losses on monthly FCA	(203)	(159)	(122)	(161)	(375)	(295)	(473)	(133)	(94)	(31)	(2,046)
Recovery of fixed cost incremental units	(803)	(610)	(162)	(547)	(1,477)	(604)	(416)	(88)	(70)	(181)	(4,958)
<b>Total</b>	<b>(4,690)</b>	<b>(7,204)</b>	<b>(3,903)</b>	<b>1,762</b>	<b>(9,077)</b>	<b>(15,646)</b>	<b>(2,662)</b>	<b>(2,238)</b>	<b>(3,494)</b>	<b>(4,341)</b>	<b>(51,493)</b>

3. The proposed quarterly adjustments are formula based and as per the already prescribed mechanism. However, since the impact of any such adjustments has to be made part of the consumer end tariff, the Authority, in order to provide an opportunity of hearing to all the concerned and meet the ends of natural justice, decided to conduct a hearing in the matter.
4. The hearing was scheduled on April 29, 2025, for which advertisement was published in newspapers on April 16, 2025. Separate notices were also sent to the stakeholders for inviting comments from the interested/ affected parties. Salient features of the proposed adjustments along-with adjustment requests/addendums of all DISCOs were uploaded on NEPRA's website for information of all concerned.
5. The hearing was held as per the schedule on April 29, 2025, which was attended by XWDISCOs, CPPA-G and other stakeholders including general public and media.
6. During the hearing, XWDISCOs generally submitted that adjustments were largely result of lower cost billed by CPPA-G to DISCOs on account of capacity charges. Analysis of capacity charges billed by CPPA-G to DISCOs revealed that reduction is due to mainly on following accounts;

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Major Reasons for Capacity Diff:	Rs. Bln
Impact of 5 Terminated Plants	16
Impact of Neelum Jhelum	18
less Invoice of K2	18
less Invoice of K3	12
Impact of Negotiations	17
<b>Total</b>	<b>80.67</b>

7. However, it has been observed that during the quarter, the purchase of DISCOs as compared to purchases built in the reference tariff decreased by 8.6% (excluding the impact of Incremental package units). DISCO wise data of drawl is as under;

DISCOs	Actual Purchases - GWh				Ref. Purchases - GWh				Inc./Dec.
	January	February	March	Total	January	February	March	Total	
FESCO	865	762	1,027	2,653	950	883	1,097	2,930	-9.4%
GEPCO	684	580	711	1,975	670	579	755	2,005	-1.5%
HESCO	256	247	413	915	270	251	371	892	2.6%
SEPCO	191	157	236	584	200	166	246	611	-4.4%
IESCO	852	681	716	2,249	824	644	739	2,207	1.9%
LESCO	1,499	1,266	1,611	4,376	1,682	1,454	1,729	4,865	-10.1%
MEPCO	901	773	1,161	2,835	1,070	1,006	1,266	3,342	-15.2%
PESCO	1,023	851	907	2,780	1,179	945	1,087	3,211	-13.4%
TESCO	142	125	146	413	160	112	129	401	2.9%
QESCO	412	362	415	1,188	469	409	505	1,383	-14.1%
<b>Total</b>	<b>6,824</b>	<b>5,802</b>	<b>7,342</b>	<b>19,968</b>	<b>7,474</b>	<b>6,448</b>	<b>7,923</b>	<b>21,846</b>	<b>-8.6%</b>

8. During hearing, the Authority noted with serious concerns that senior management of MEPCO, HESCO and QESCO were not available. The Authority directed to issue explanation to CEO of these DISCOs to explain their position.
9. During the hearing, Mr. Tanveer Bari, a commentator, inquired the per unit impact of the quarterly adjustment to which it was stated that if the adjustment is allowed in three months period, the impact would be around negative Rs.1.5/kWh.
10. Mr. Aamir Sheikh, a commentator, inquired why IESCO's claimed positive capacity adjustment while all other XWDISCOs have a negative claim. It was responded that IESCO reported a 12% higher MDI than forecast, therefore, a greater portion of the capacity was billed to IESCO by CPPA-G, resulting in a positive capacity adjustment.
11. Mr Arif Bilwani, a commentator, inquired on the impact of IPP negotiations in the instant quarterly adjustment. It was informed that termination of contracts with IPPs had led to a reduction of around Rs.16 billion, while renegotiations with IPPs have contributed a negative Rs.17 billion to the instant quarterly adjustment.
12. Mr. Rehan Javed, a commentator, submitted queries, which are discussed as under:



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- a. **Provisional Data Usage:** Multiple DISCOs (FESCO, IESCO, LESCO) used provisional fuel and O&M costs for March 2025. NEPRA should disallow recovery based on unverified data.

**Response of FESCO:** FESCO filed QTA on April 11, 2025. At that time, FESCO relied upon actual invoice of CPPA-G, wherein no segregation of fuel and O&M cost was given. However, at the time of determination of QTA, NEPRA used actual data of fuel and O&M cost.

**Response of LESCO:** The FCA for March 2025 has not yet been determined by NEPRA; therefore, LESCO utilized the provisional amount requested by CPPAG. This is subject to adjustment based on final actual data and information verified by the Authority.

**Response of MEPCO:** Data used for QTA claims is based on verified documentary evidence. Provisional amount of FCC & O&M cost for the last month of quarter (March-2025 in this case) is taken due to non-availability of FCA determination for respective month at the time of preparation and submission of QTA claim.

- b. **Incorrect Treatment of Net Metering:** Net metering units are inappropriately added to capacity charge recovery. These are energy flows and not firm capacity obligations

**Response of FESCO:** The cost of net metering units is classified under capacity charges as per previous determinations.

**Response of LESCO:** Energy exported under net metering arrangements is managed in line with prevailing NEPRA guidelines and adjusted accordingly in the energy accounting mechanisms.

**Response of MEPCO:** Net-metering units /cost is made part of Capacity Charges due to the fact that no fuel cost is involved on the same analogy of Hydel generation.

- c. **Flat Net Metering Credit Rate:** A universal Rs. 27/kWh credit is used regardless of TOU or generation source. This may lead to overpayment to net metering consumers.

**Response of LESCO:** The National Average Power Purchase Price rate as determined by NEPRA for FY 2024-25 is used for net Metering units' calculation i.e. Rs.27

**Response of MEPCO:** Treatment of net-metering units is based on NEPRA Regulations notified by SRO 892(I)/2015 dated 01-09-2015.

- d. **O&M Costs Not Segregated:** FESCO's O&M is not bifurcated in CPPA invoices, leading to potential over-recovery.

**Response of FESCO:** In CPPA-G invoice no segregation of fuel and O&M cost is given. However, at the time of determination of QTA, NEPRA used actual data of fuel and O&M cost.

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- e. **Renewable O&M misplaced:** GEPCO and LESCO include fixed O&M of renewable power under capacity charges without clear regulatory backing.

**Response of LESCO:** As per CPPAG invoices the Fixed O&M of renewable power projects is included in the GST settlement advice and the same is required to be submitted as part of capacity charges while submission of quarterly adjustments.

- f. **Unexplained Capacity Charge Deviations:** LESCO shows a Rs.7.8 billion adjustment in capacity charges in March alone, which must be investigated.

**Response of LESCO:** LESCO requested Rs. 7.8 billion as negative adjustment for 3<sup>rd</sup> quarter of FY 2025 which is based on reference vs actual invoices. The month wise breakup is also given along with quarterly adjustment which is available on NEPRA website also.

- g. **Incremental Units Discount Application Inconsistent:** Some DISCOs show discounts only for Jan-Feb (GEPCO), others apply for all three months (FESCO), creating non-uniform consumer impact.

**Response of FESCO:** The discount on incremental units has been given in line with relevant S.R.O for the period from December to Feb-2025. (In the instant QTA incremental units applied to Jan & Feb only)

**Response of MEPCO:** Incremental units included by for Jan & Feb 2025 as per incentive scheme of the Federal Government. However, the practice may differ in various DISCOs due to different billing cycle of respective DISCOs.

- h. **No Adjustment for Lifeline Units:** Lifeline units are billed at a subsidized rate but not backed out in recovery estimates. This leads to cross-subsidization.

**Response of FESCO:** FESCO passed on FCA as per NEPRA determination.

**Response of LESCO:** The recovery of power purchase price is comprised of reference rates determined by regulator on monthly basis. The subsidy factor is apart from NEPRA rate which is not part of quarterly adjustment.

**Response of MEPCO:** Tariff Rates for various consumer categories are as per GoP socio-economic policy.

- i. **T&D Loss Impact Passed in Full:** HESCO with 17.55% T&D losses has passed the entire impact to consumers. NEPRA must impose disallowance for exceeding targets

**Response:** HESCO has claimed the same as per the Authority approved T&D losses vide decision dated 14.06.2024.

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- j. **Lack of Data Reconciliation with CPPA-G:** There is no invoice-wise reconciliation provided, despite reference to CPPA-G billing.

**Response of LESCO:** LESCO's quarterly adjustment submissions are based on actual invoices received from CPPAG, reconciled against NEPRA reference rates. Invoice details and corresponding calculations have been submitted for the Authority's verification.

**Response of MEPCO:** Reconciliation of CPPA-G invoicing is carried out and communicated to CPPA-G.

- k. **SPPs Cost Inclusion Without Benchmarks:** HESCO includes SPP fixed and ROE charges without NEPRA's benchmark approval.

**Response:** The same has been allowed on provisional basis to avoid piling up of cost and is subject to adjustment, if required.

- l. **Overstatement of Over-Recoveries:** IESCO and LESCO show recovery mismatches of over Rs.2 billion in capacity and O&M.

**Response:** Recovery of DISCOs under each head is based on 100% recovery target as given in the tariff determination. Further, the units purchased by each DISCO are also adjusted only to the extent of allowed level of T&D losses. Thus, no inefficiency on account of under recovery or excess losses is passed on to the consumers.

- m. **Mismatch Between Net and Gross Purchases:** DISCOs report different gross and net purchases, without explaining netting logic (losses, incremental units).

**Response of FESCO:** FESCO has to work out its recovery on net purchase after excluding the incremental units sold at flat Rate. For this purpose, the incremental units are grossed up for arriving at net purchased units.

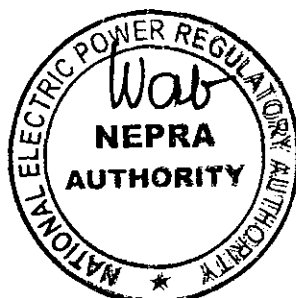
- n. **No Uniform Use of System Charges:** UOSC rates differ significantly from NEPRA-notified reference, with no justification.

**Response of LESCO:** The UOSC includes NTDC use of system charges, PMLTC charges, and MOF of CPPAG based on actual Maximum Demand Indicator (MDI). These are compared with the NEPRA-approved reference tariffs applicable to LESCO for each respective month.

**Response of MEPCO:** UoSC rates are taken as per NEPRA notified reference

- o. **Absence of Marginal Fuel Benchmarking:** No effort made to segregate efficient vs inefficient fuel impact in total fuel cost.

**Response of MEPCO:** This point primarily relates to FCA determination.



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- p. **Unsegregated Cost of CPPAG Charges:** Invoices club O&M, MOF, PMLTC, GST under one head without detailed breakup.  
**Response of MEPCO:** Breakup and segregation of O&M, MoF, PMLTC & GST etc. is reported based on verifiable documentary evidence, however QTA claim is prepared by clubbing MoF under UoSC head.
- q. **Improper Handling of incremental Units:** GEPCO and FESCO apply recovery of fixed cost on incremental units differently, resulting in lack of comparability.  
**Response of FESCO:** FESCO used same mechanism regarding recovery of Fixed cost on incremental units as per previous decisions.
- r. **Transfer Pricing Mechanism Loosely Applied:** DISCOs claim use of TPM but with varied base rates and calculation methods.  
**Response of FESCO:** FESCO claimed its QTA as per notified reference vs actual for FY 2024-25.  
**Response of MEPCO:** QTA claim is prepared on the basis of rates and calculations as contained in reference tariff and actual invoicing.
- s. **Deviation from Notified T&D Targets:** Some DISCOs exceed NEPRA-notified losses without self-bearing the impact.  
**Response of FESCO:** FESCO used NEPRA determined losses of 8.38% in the instant QTA calculation.  
**Response of LESCO:** LESCO claims is based on NEPRA allowed losses for FY 2024-25.  
**Response of MEPCO:** The impact of excess T&D Losses is neither claimed by DISCOs nor allowed by the Regulator.
- t. **Lack of Load Forecasting Justification:** LESCO's capacity shortfall is linked to poor forecasting. No justification or improvement plan shared.  
**Response:** All XWDISCOs have been directed through this decision to submit a study for Comprehensive Assessment of the Financial and Technical Impacts of Distributed Solar Photovoltaic (PV) Integration on Distribution Utility Operations and Infrastructure to better understand future trend of demand.
- u. **Absence of Per Unit Impact Table:** No DISCO provides impact of quarterly adjustments in paisa/kWh on different categories.  
**Response of MEPCO:** QTA claim is prepared in terms of amount. Per unit impact depends on the amount and effective period of QTA implementation which is to be decided by NEPRA.



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- v. **Improper Accounting of PHL/PHL Surcharge Recovery:** DISCOs did not adjust for parallel recovery of debt surcharges.

**Response of LESCO:** Surcharges related to Power Holding Limited (PHL) are treated separately in accordance with Ministry of Energy directions and are not adjusted against quarterly tariff adjustments.

**Response of MEPCO:** PHL surcharge is not relevant to QTA claims.

- w. **No Assessment of Peak Load vs Base Load:** Variable and fixed cost breakdowns are not aligned with system dispatch profile.

**Response:** All XWDISCOs have been directed through this decision to submit a study for Comprehensive Study on the Impact of Existing Time-of-Use (TOU) Tariff Timings and Proposed Measures for Aligning Demand with Evolving Load Patterns to better align the same.

- x. **No Disallowance for Open Cycle or Start-Up Fuel:** Despite NEPRA directives, inefficient startup cost of open cycle plants are passed on.

**Response:** Does not fall under the scope of quarterly adjustments as defined by NEPRA Act Section 31.

- y. **Under-Recovery Claims from Renewable Projects Without Verification:** GEPCO and HESCO include RE fixed cost without signed acceptance or compliance audit.

**Response:** CPPA-G certifies in its submissions that the cost claimed by CPPA-G for Generation Plants, and billed to DISCOs, has been considered, as the same is determined /approved by WPPO/CPPA.

- z. **GEPCO's Rs.6.4 Billion Capacity Adjustment Unexplained:** Needs validation through actual MW drawdown and billing demand.

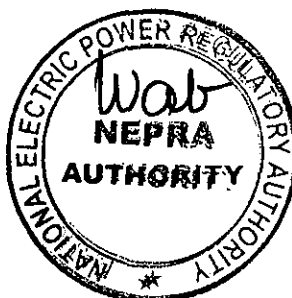
**Response:** QTA claim is prepared on the basis of rates and calculations as contained in reference tariff and actual invoicing.

- aa. **No Segregation of Sales for Reference Tariff and Incremental Schemes:** Tariff blending effect is hidden.

**Response of FESCO:** FESCO segregated its sales into normal & incremental Units

**Response of MEPCO:** Tariff blending effect is not relevant as incremental scheme contain flat rate for incremental units.

Financial impact of incremental units mentioned under para 22 of the instant decision.



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- bb. **No Marginal Tariff Comparison:** Monthly marginal cost from CPPA not compared with actual cost being recovered.

**Response:** Does not fall under the scope of quarterly adjustments as defined by NEPRA Act Section 31.

- cc. **Disparate Recovery Methodology Among DISCOs:** Some use Rs./kWh-based recovery; others mix it with monthly billing weightage.

**Response of FESCO:** FESCO worked out its QTA calculation by using per units rates.

**Response of MEPCO:** PPP Cost recovery is calculated as per mechanism approved by the Regulator.

- dd. **Net Metering Cost of Rs. 1 Billion for FESCO:** No breakdown or validation of time of injection, peak/off-peak balance.

**Response of FESCO:** Gross cost of Rs. 1 billion calculated on off peak units of 37.325 MWh imported for the 3<sup>rd</sup> Quarter multiplied by Rs 27/kWh (National Average Power Purchase Price for FY 2024-25)

13. The Authority, in order to work out the instant quarterly adjustments of XWDISCOs, obtained details of actual Power Purchase cost billed by CPPA-G to DISCOs for the 3<sup>rd</sup> quarter of the FY 2024-25 i.e. from January to March 2025. CPPA-G provided the information, and also certified that:

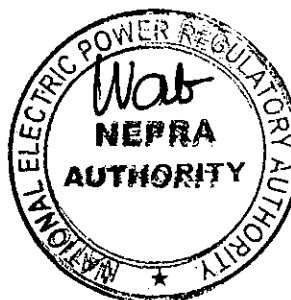
a. **2002 Power Policy Plants**

- i. Invoices of all Capacity Purchase have been processed in accordance with rates, Terms & Conditions as determined by NEPRA. Payments related to periodical adjustments are also made as per decision of NEPRA.
- ii. 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.

b. **1994 Power Policy Plants**

- i. Invoices of all Capacity Purchase have been made strictly in accordance with the rates, terms & conditions as stipulated in the respective Power Purchase Agreement.
- ii. All payments to IPPs are being made after observing all formalities provided in the respective Power Purchase Agreement.
- iii. 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.

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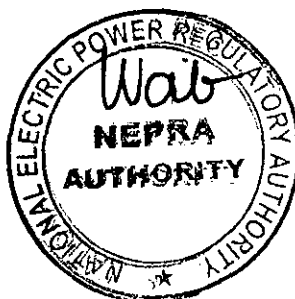


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14. Thus, for the purpose of determination of 3<sup>rd</sup> quarter of the FY 2024-25, the information submitted by CPPA-G along-with certification of CPPA-G has been relied upon. In case of any variation, error, omission or misstatement found out at a later stage, CPPA-G shall be responsible and the same would be adjusted in the subsequent quarterly adjustments. The plant wise detail of capacity charges and utilization factors for the quarter from January to March 2025, as submitted by CPPA-G are attached as **Annex-A** with the instant decision. The Authority noted that for WAPDA & PEDO etc., CPPA-G has provided a consolidated figure instead of plant wise break up. CPPA-G is directed to ensure that in future, details of plant wise capacity charges should be provided for each month of the quarter, for all plants connected with the national grid.
15. In light of the above discussion, information submitted by CPPA-G and adjustment requests filed by XWDISCOs, the Authority has decided to restrict the amount of quarterly adjustment for the 3<sup>rd</sup> quarter of the FY 2024-25, as requested by XWDISCOs on account of variation in Capacity charges, Variable O&M, Use of System Charges and Market Operator Fee. However, regarding FCA impact on T&D losses, the same has been worked out as per the Authority's approved monthly FCAs decisions for the relevant months.
16. Here it is pertinent to mention that HESCO in its instant quarterly adjustment request has also claimed an amount of Rs.1,094.90 million on account of unrecovered pending costs of CPPs/ SPPs. The same is tabulated below:

Sr.#	Months	As per FCA Determination			As per HESCO Data						Unrecovered Cost of SPPs		
		Units (GWh)	Fuel Cost Component (Rs. In M)	Unit Cost	Units (GWh)	Fuel Cost Component (Rs. In M)	Fixed Cost Component (Rs. In M)	ROE (Rs. In M)	Total Cost (Rs. In M)	Per Unit Fuel CC	Fuel Cost Component (Rs. In M)	Fixed Cost & ROE Component (Rs. In M)	Total
		1	2	3=(2/1)	4	5	6	7	8=(5+6+7)	9=(5/4)	10=(5-2)	11=(6+7)	12=(10+11)
1	Jul-24	5.030	10.500	2.087	5.040	132.920	10.569	1.951	145.440	26.374	122.42	12.52	134.94
2	Aug-24	4.700	9.800	2.085	4.692	123.749	9.840	1.816	135.405	26.374	113.95	11.66	125.60
3	Sep-24	4.700	9.800	2.085	4.111	108.418	8.621	1.591	118.630	26.374	98.62	10.21	108.83
4	Oct-24	5.450	11.400	2.092	5.442	143.519	11.412	2.106	157.038	26.374	132.12	13.52	145.64
5	Nov-24	5.280	13.700	2.595	5.237	124.420	10.600	1.766	136.787	23.758	110.72	12.37	123.09
6	Dec-24	7.700	24.600	3.195	7.730	118.803	10.369	-	129.172	15.369	94.20	10.37	104.57
	Jan-25	5.300	17.730	3.345	5.296	60.670	7.523	-	68.193	11.456	42.94	7.52	50.46
	Feb-25	5.770	18.900	3.276	5.848	85.760	7.927	-	93.687	14.666	66.86	7.93	74.79
	Mar-25	8.011	-	-	8.011	206.873	16.677	3.017	226.567	25.824	206.87	19.69	226.57
		51.941	116.430		51.406	1,105.133	93.538	12.248	1,210.920		988.703	105.786	1,094.490

17. Out of the total claimed cost of Rs.1,094.90 million, HESCO has claimed Rs.988.70 million on account of unrecovered fuel cost and Rs.105.79 million account of fixed cost and ROE component for these SPPs/ CPPs. Here it is pertinent to mention that according to NEPRA Act Section 31(7)(ii), quarterly adjustments include variation in capacity charges, transmission charges, variable O&M and T&D losses impact on FCA. Therefore, the requested pending cost on account of fuel of Rs.988.703 million is not relevant for the scope of quarterly adjustment and has not be considered in the instant adjustment.
18. Regarding remaining claim of Rs.105.79 million which pertains to fixed cost and ROE component of SPPs/ CPPs for the period July 2024 to March 2025, the Authority, has decided to provisionally allow an amount of Rs.35 million as part of instant quarterly adjustment as the remaining amount has already been provisionally accounted for in the previous quarterly adjustment. HESCO is



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again directed to submit the complete workings of all differential claim along-with reconciliation of already allowed amounts by the Authority vis a vis amounts to be allowed as per the mechanism provided in decision of PAR of SPPs/CPPs. Any adjustment, if required, based on final working/reconciliation to be submitted by HESCO, shall be made subsequently. In case the required recon is not provided the already allowed amount be adjusted back in subsequent quarter.

19. CPPA-G in its plant wise detail of capacity charges also reported Rs.76 million on account of PPIB fee. Since the issue of PPIB fee is under consideration of the Authority through separate proceedings, therefore, while working out instant quarterly adjustment impact of PPIB Fee has been excluded from the working of the instant quarterly adjustment.
20. Based on the discussion made in the above paragraphs and after considering the aforementioned adjustments, the Authority has determined a negative adjustment of Rs.52,603 million on account of variation in Capacity charges, Variable O&M, additional recovery on Incremental sales, Use of System Charges, Market Operator Fee and FCA impact on T&D losses for the 3<sup>rd</sup> quarter of FY 2024-25.
21. It is pertinent to mention here that as per earlier practice, and the fact that the adjustment is being made in the already notified uniform tariff, the Authority beside determination of DISCO wise rate of quarterly adjustment, also determines a uniform rate for the quarterly adjustments to be charged from the consumers.
22. The Authority has decided to allow negative quarterly adjustments of Rs.52,603 million pertaining to the 3<sup>rd</sup> quarter of the FY 2024-25, in a period of 03 months i.e. May 2025 to July 2025, at a uniform rate of negative Rs.1.5538/kWh, to be applicable to all consumer categories, except lifeline consumers and prepaid consumers.

Description	UNIT	FESCO	GEPCO	HESCO	SEPCO	IESCO	LESCO	MEPCO	PESCO	TESCO	QESCO	Total
FCA Impact of T&D Losses	Rs. Mln	(203)	(181)	(133)	(112)	(187)	(428)	(338)	(486)	(31)	(133)	(2,231)
V. O&M	Rs. Mln	184	127	55	17	116	288	145	172	38	69	1,210
Capacity Charges	Rs. Mln	(4,254)	(6,483)	(3,841)	(3,317)	1,894	(7,824)	(14,452)	(2,539)	(4,035)	(2,289)	(47,140)
UOSC/MoI	Rs. Mln	453	(27)	183	(22)	502	100	(518)	33	(114)	3	592
Recovery of PPP on Incremental Units	Rs. Mln	(803)	(610)	(162)	(70)	(547)	(1,477)	(604)	(416)	(181)	(88)	(4,957)
<b>Total Under / (Over) Recovery</b>	<b>Rs. Mln</b>	<b>(4,623)</b>	<b>(7,174)</b>	<b>(3,898)</b>	<b>(3,504)</b>	<b>1,779</b>	<b>(9,341)</b>	<b>(15,766)</b>	<b>(3,236)</b>	<b>(4,324)</b>	<b>(2,439)</b>	<b>(52,527)</b>
Less- PPIB Fee	Rs. Mln	9.89	6.86	5.37	3.09	6.36	15.70	12.13	10.22	2.12	4.29	76.04
<b>Total Under / (Over) Recovery net of Legal charges</b>	<b>Rs. Mln</b>	<b>(4,633)</b>	<b>(7,181)</b>	<b>(3,903)</b>	<b>(3,507)</b>	<b>1,772</b>	<b>(9,357)</b>	<b>(15,778)</b>	<b>(3,246)</b>	<b>(4,326)</b>	<b>(2,443)</b>	<b>(52,603)</b>
Projected Sales for 3 months (excluding Life Line sales)	GWh	4,929	3,518	1,417	1,198	3,578	7,459	6,117	3,738	332	1,570	33,855
<b>Per Unit Impact</b>	<b>Rs./kWh</b>	<b>(0.9399)</b>	<b>(2.0412)</b>	<b>(2.7537)</b>	<b>(2.9286)</b>	<b>0.4953</b>	<b>(1.2545)</b>	<b>(2.5792)</b>	<b>(0.8686)</b>	<b>(13.0299)</b>	<b>(1.5566)</b>	<b>(1.5538)</b>

23. It is important to note that Federal Government issued Policy Guidelines to NEPRA, vide letter dated 22.08.2023, for uniform application of quarterly adjustments on XWDISCOs and K-Electric consumers. The policy guidelines state that NEPRA shall determine the same tariff rationalization for K-Electric consumers as determined for XWDISCOs consumers, with same application period. The Policy Guidelines are reproduced hereunder:

*i. In order to maintain uniform tariff across country, NEPRA shall determine application of quarterly tariff determinations (QTAs) of XWDISCOs on KE consumers by way of tariff*



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*rationalization. NEPRA shall determine the same tariff rationalization for K-Electric consumers as determined for XWDISCOs consumers, with same application period, keeping in view financial sustainability of the sector and uniform tariff policy of the Federal Government.*

- ii. Subsidy or surcharge against the determined tariff for K-Electric consumers shall be assessed on an annual basis instead of monthly or quarterly basis.*
- iii. Federal Government's motion with respect to recommendation of consumer end tariff for K-Electric Limited dated March 17, 2023 pursuant to the 1<sup>st</sup> Quarterly adjustment of FY 2022-23 determination for XWDISCOs, shall be considered accordingly.*

24. It is also important to mention here that in light of aforementioned policy guidelines, the Authority earlier allowed application of quarterly adjustment since 4<sup>th</sup> quarter of FY 2022-23, determined for XWDISCOs, on the consumers of K-Electric, with the same applicability period, as of XWDISCOs.
25. In view of the above discussion, relevant provisions of NEPRA Act, NE Policy and Policy Guidelines issued by the Federal Government, the Authority has decided to allow the application of instant quarterly adjustments on the consumers of K-Electric as well, with the same applicability period. Accordingly, the instant quarterly adjustment of negative Rs.1.5538/kWh shall also be charged from the consumers of K-Electric except life line and prepaid consumers, to be recovered in a period of 03 months i.e. May 2025 to July 2025.
26. In case any bills for the applicable period of the instant adjustment, are issued before the notification of this decision, the same may be applied in subsequent month.
27. While effecting the Quarterly Adjustments, the concerned DISCOs shall keep in view and strictly comply with the orders of the courts notwithstanding this order.
28. In view of the technical and financial challenges faced by Distribution Companies (DISCOs) arising from the growing penetration of Distributed Generation (DG), as well as the misalignment between actual system peak and off-peak demand and the designated peak/off-peak hours used in consumer-end tariff determinations, the Authority directs all DISCOs to undertake a comprehensive study as detailed below, to thoroughly examine these issues and be submitted within four months for the Authority's consideration.
  - Comprehensive study on the impact of existing time-of-use (ToU) tariff timings and proposed measures for aligning demand with evolving load patterns
  - Comprehensive assessment of the financial and technical impacts of distributed solar photovoltaic (PV) integration on distribution utility operations and infrastructure
29. The Authority further directs all DISCOs to jointly develop, through mutual consultation, a uniform Terms of Reference (ToR) to carry out the above studies and submit the same to NEPRA within two weeks of the issuance of this determination for the Authority's approval.



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30. The instant decision along-with attached Annexure, is intimated to the Federal Government, prior to its notification in the official Gazette as per Section 31 (7) of the NEPRA Act.

**AUTHORITY**

Additional note is attached

Rafique Ahmed Shaikh

Member

Ms. Amina Ahmed

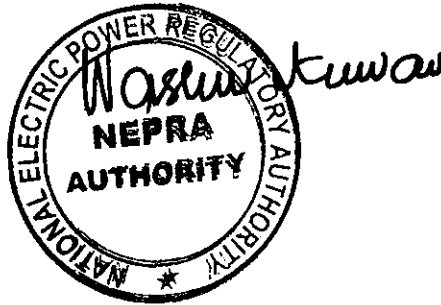
Member

Engr. Maqsood Anwar Khan

Member

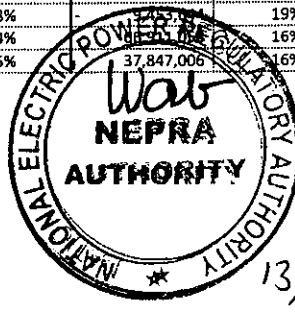
Waseem Mukhtar

Chairman



Annex - A

Power Producer	Jan-25		Feb-25		Mar-25	
	CPP (Rs.)	Plant Factor	CPP (Rs.)	Plant Factor	CPP (Rs.)	Plant Factor
WAPDA Hydel	12,698,970,853	12%	12,316,493,712	30%	12,037,467,122	15%
Pakhtunkhwa Energy Development Organization (Malakand-III)	1,329,047,672	2%	114,002,026	5%	1,211,968,712	32%
Larab Energy Limited	123,861,888	45%	1,252,716,791	71%	569,771,384	45%
Star Hydro Power Limited	1,950,872,027	12%	516,906,270	12%	471,699,040	20%
Mira Power Limited	643,705,391	1%	639,603,133	6%	643,705,391	22%
Karot Power Company (Pvt.) Limited	14,674,595,004	11%	1,059,644,274	12%	1,891,330,869	38%
S K Hydro (Private) Limited	15,688,506,339	9%	2,474,032,620	8%	12,509,027,772	10%
Jamshoro Power Company Limited-(Genco-1)	305,017,626	0%	112,942,390	0%	-	0%
Guddu	234,000,000	0%	235,000,000	0%	-	0%
747 - GENCO II	183,375,872	49%	2,241,315,320	35%	1,069,122,888	35%
Muzaffar Garh	317,615,960	0%	218,174,107	0%	185,535,790	0%
Nandipur Power	1,801,822,535	0%	13,582,515,125	0%	751,695,035	5%
Kohinoor Energy Ltd.	206,406,907	20%	206,406,907	0%	134,103,680	0%
Pak Gen Power Limited	733,249,934	2%	-	0%	23,664,125	0%
Fauji Kabinwala Power Company Ltd.	255,379,178	0%	255,379,178	0%	255,379,178	0%
Uch Power Ltd.	704,169,376	84%	628,126,467	88%	677,519,168	93%
Liberty Daharki Power Limited	421,212,980	48%	421,212,980	41%	433,240,327	0%
Mianwali C-1	1,826,004,718	100%	1,649,383,834	100%	1,814,479,066	100%
Mianwali C-2	1,926,857,201	104%	1,742,602,604	104%	1,928,012,162	103%
Mianwali C-3	4,031,507,989	100%	3,644,751,145	100%	4,029,871,019	99%
Mianwali C-4	4,009,635,815	99%	3,625,438,397	100%	4,007,129,028	99%
Karachi Nuclear Power Plant-Unit-2	7,409,312,376	90%	7,161,678,665	90%	7,938,829,453	98%
Karachi Nuclear Power Plant-Unit-3	14,061,961,002	75%	7,608,948,519	58%	8,434,585,903	74%
Tavanir Iran	382,990,903	22%	125,101,309	22%	-	26%
Attock Gen Limited	249,299,607	19%	240,329,667	0%	8,406,106,442	1%
Nishat Power Limited	365,139,823	14%	348,734,154	0%	121,935,142	0%
Foundation Power Company Daharki Ltd.	232,988,860	79%	227,674,815	35%	81,764,856	86%
Orient Power Company (Private) Limited	368,021,245	19%	324,679,474	3%	367,225,225	34%
Nishat Churian Power Limited	546,830,374	8%	560,660,179	0%	165,021,814	0%
Saif Power Limited	201,087,725	2%	194,534,498	0%	138,225,531	12%
Engro Powergen Qadirpur Limited	181,149,262	42%	660,497,489	45%	763,557,220	51%
Sapphire Electric Company Limited	203,675,779	9%	212,963,499	0%	1,515,039,046	12%
Narowal Energy Limited	414,119,073	8%	486,000,000	0%	223,711,929	0%
Liberty Power Tech Limited	231,110,945	12%	328,314,911	0%	138,280,037	0%
Halmore Power Generation Company Limited	421,654,873	16%	401,377,670	2%	372,003,678	24%
Uch-II Power (Pvt.) Limited	1,943,227,591	83%	1,932,135,145	23%	1,551,516,673	84%
JDW PLANT-II	-	84%	27,407,254	83%	-	93%
JDW PLANT-III	-	87%	92,981,217	83%	-	94%
RYK Mills Limited	103,242,566	93%	87,645,269	90%	-	46%
Chiniot Power Limited	-	64%	399,308,980	57%	-	15%
Hamza Sugar Mills Limited	-	29%	-	0%	325,789	0%
Almoiz Industries Limited	1,111	34%	61,474,416	22%	-	5%
China Power Hub Generation company (Pvt.) Ltd	9,895,259,152	0%	10,770,134,882	13%	10,219,026,162	17%
Engro Powergen Thar (Pvt) Limited	5,075,957,999	66%	4,647,657,713	46%	4,949,221,672	63%
Thal Industries Corporation Ltd	-	87%	192,780,288	79%	-	19%
Quaid-e-Azam Thermal Power (Pvt) Limited	4,386,433,134	82%	430,784,815	59%	1,784,934,480	64%
Huaneng Shandong Ruyi Energy (Pvt) Ltd	8,999,307,350	65%	8,236,849,759	0%	8,884,573,867	39%
Balokli Power	2,001,819,663	60%	1,338,822,817	47%	1,704,294,136	0%
Haveli B/Shah	2,108,618,877	0%	1,170,490,576	17%	1,912,585,308	84%
Port Qasim Electric Power Company (Pvt.) Limited	9,168,128,796	4%	8,628,750,848	0%	9,157,049,407	1%
Lucky Electric Power Company Limited	4,798,037,317	0%	3,782,802,818	0%	2,675,821,709	0%
Punjab Thermal Power Private Limited	414,591,162	28%	226,259,877	2%	68,683	4%
Thar Energy Limited	2,621,618,741	58%	2,419,994,650	23%	2,579,669,660	72%
Thar Coal Block-1 Power Generation Company (Pvt) Limited	10,655,110,264	79%	9,818,971,154	82%	643,920,712	88%
ThalNova Power Thar (Pvt.) Ltd	1,882,280,095	54%	2,424,848,051	66%	2,590,349,529	67%
Zorlu Enerji Pakistan Limited	60,932,698	13%	97,894,755	12%	74,811,213	13%
FFC Energy Limited	65,354,109	14%	82,138,682	11%	51,641,732	11%
Three Gorges First Wind Farm Pakistan (Private) Limited	100,517,126	13%	64,437,686	11%	78,387,169	12%
Foundation Wind Energy-I Limited	13,790,750	13%	300,053,212	12%	193,132,870	15%
Sapphire Wind Power Company Limited	238,295,758	13%	254,274,582	10%	305,815,364	12%
Yunus Energy Limited	262,677,710	16%	165,681,766	13%	192,669,448	15%
Metro Power Company Ltd	448,082,256	24%	288,893,465	16%	219,186,131	17%
Gul Ahmed Wind Power Ltd	434,736,889	17%	260,930,049	14%	233,680,755	15%
Master Wind Energy Limited	196,713,393	12%	205,954,860	10%	184,426,319	12%
Tenage Generasi Limited	236,279,205	14%	351,183,735	12%	414,750,520	15%
ACT Wind (Pvt) Limited	51,341,734	11%	106,318,853	10%	84,806,065	13%
Hydrochina Dawood Power (Private) Limited	137,518,264	12%	279,295,040	12%	249,771,700	14%
Sachal Energy Development (Private) Limited	211,455,129	14%	330,847,483	12%	185,116,021	13%
UEP Wind Power (Pvt)Ltd	390,358,314	11%	470,329,902	11%	435,174,451	13%
Quaid E Azam Solar Power Pvt Ltd	362,126,108	16%	424,583,573	18%	833,484,494	22%
Appolo Solar Development Pakistan Limited	1,185,393,546	17%	64,983,922	19%	758,394,277	22%
Best Green Energy Pakistan Limited	1,265,182,233	17%	20,128,087	19%	785,180,004	22%
Crest Energy Pakistan Limited	1,282,841,105	18%	-	19%	812,902,101	23%
Harappa Solar (Pvt) Limited	55,180,715	14%	-	16%	106,892,363	24%
AJ Power (Private) Ltd.	43,031,595	15%	37,847,006	16%	69,606,961	21%



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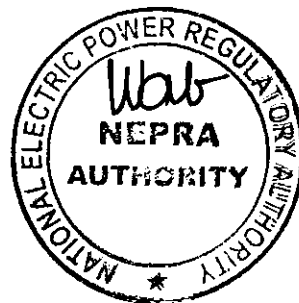
Artistic Energy (Pvt.) Limited	215,816,769	27%	138,275,908	19%	179,490,366	23%
Jhimpir Power (Private) Limited	250,873,738	18%	242,985,037	14%	285,993,744	15%
Hawa Energy (Private) Limited	295,087,992	22%	250,504,602	14%	279,576,951	15%
Three Gorges Third Wind Farm Pakistan (Private) Limited	218,702,164	15%	173,813,216	13%	200,163,054	15%
Three Gorges Second Wind Farm Pakistan Limited	221,644,851	14%	205,504,141	12%	188,543,064	14%
Tricon Boston Consulting Corporation (Private) Limited	1,087,397,538	16%	1,177,284,366	16%	828,611,581	21%
Zephyr Power (Pvt.) Limited	281,948,461	17%	70,548,509	17%	237,777,397	20%
Foundation Wind Energy-II Limited	86,739,298	19%	151,386,586	14%	62,745,951	16%
Master Green Energy Limited	90,321,430	16%	93,052,773	13%	79,495,825	14%
Lucky Renewables (Private) Limited	101,344,636	17%	34,201,592	13%	114,698,911	15%
ACT2 DIN Wind (Pvt) Ltd.	81,269,711	13%	72,782,438	14%	113,371,801	20%
Artistic Wind Power (Pvt) Ltd.	73,888,295	15%	99,251,449	15%	94,240,363	19%
Indus Wind Energy Ltd.	42,950,920	18%	123,922,485	19%	119,934,864	23%
Lakeside Energy Limited	90,751,416	17%	97,422,786	16%	169,082,972	21%
Liberty Wind Power-I Ltd.	85,737,437	16%	100,322,921	14%	93,066,789	18%
DIN Energy Ltd.	103,029,660	19%	124,467,575	15%	90,829,554	18%
Gul Ahmed Electric Limited	87,548,769	16%	116,319,591	18%	128,235,058	25%
Atlas Solar Limited	219,727,064	16%	159,420,149	19%	257,326,594	27%
Liberty Wind Power-II (Pvt.) Ltd.	78,021,659	15%	24,647,846	14%	93,024,107	18%
NASDA Green Energy Limited	90,137,830	17%	80,129,777	16%	187,468,817	19%
Metro Wind Power Limited	136,452,808	18%	135,387,853	19%	28,029	17%
Helios Power Limited	501,465,334	17%	1,559,559	19%	179,494,144	26%
Meridian Energy Limited	508,488,987	18%	5,968,491	19%	182,349,522	26%
HNDS Energy Limited	499,230,609	17%	9,548,481	19%	179,858,159	26%



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SPPs/CPPs	DISCOs	January			February			March		
		Energy KWh	Capacity rate Rs./kWh	Capacity Charges Rs.	Energy KWh	Capacity rate Rs./kWh	Capacity Charges Rs.	Energy KWh	Capacity rate Rs./kWh	Capacity Charges Rs.
Kumhar wala Power House	MEPCO	4,889	1.17	5,738	271,090	1.17	318,151	701,125	1.17	822,840
SPP Lucky Cement	HESCO		1.17	-	160	1.17	188		1.17	-
SPP Omni Power	HESCO	1,345,120	1.17	1,578,633	1,628,560	1.17	1,911,278	2,416,080	1.17	2,835,511.49
SPP Agar Textiles	HESCO		1.53	-		1.53	-		1.53	-
SPP Tando Allah Yar Sugar Mill	HESCO	1,345,560	1.53	2,058,707	1,191,360	1.53	1,822,781		1.53	-
SPP Bandhi Sugar Mill	HESCO		1.53	-		1.53	-		1.53	-
SPP Chamber Sugar Mill	HESCO	445,980	1.53	682,349	334,680	1.53	512,060	24,660	1.53	37,729.80
SPP Faran Sugar Mill Shaikh Bhirkio	HESCO	412,000	1.53	630,360	110,400	1.53	168,912	16,880	1.53	25,826.40
SPP Thatta Cement	HESCO	65,340	1.17	76,683	773,370	1.17	907,627	5,378,000	1.17	6,311,620.80
Bandhi	HESCO	1,681,600	1.53	2,572,848	1,730,560	1.53	2,647,757	175,360	1.53	268,301
Shikarpur Power	SEPCO	1,962,800	1.17	2,303,542	1,863,400	1.17	2,186,886	6,144,800	1.17	7,211,537
Piyaro Goth Sugar Mill/Dadu	SEPCO	5,658,240	1.17	6,640,510	7,368,080	1.17	8,647,179	8,132,160	1.17	9,543,903
Dadu	SEPCO		1.17	-		1.17	-		1.17	-
Lodra	SEPCO		1.17	-		1.17	-		1.17	-
Al-Noor Sugar	SEPCO	125,600	1.53	192,168	700,911	1.53	1,072,394	151,139	1.53	231,243
Head marala	GEPCO	126,615	8.39	1,062,882	1,475,350	8.39	12,384,973	2,121,776	8.39	17,811,461
Chianwali	GEPCO	90,735	10.10	916,451	697,808	10.10	7,048,070	1,163,307	10.10	11,749,750
<b>Total</b>		<b>13,254,701</b>		<b>18,709,396</b>	<b>18,145,729</b>		<b>39,628,256</b>	<b>26,425,287</b>		<b>56,849,723</b>



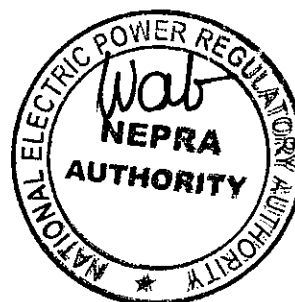
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Net Metering Energy - GWh	FESCO	GEPCO	HESCO	SEPCO	IESCO	LESCO	MEPCO	PESCO	TESCO	QESCO
January	5.76	5.21	0.59	0.26	7.62	14.87	21.67	2.91	0.00	0.12
February	10.64	10.19	0.50	0.40	16.29	35.09	27.92	4.60	0.01	0.11
March	20.93	22.56	0.58	0.46	38.08	53.78	39.84	7.31	0.01	0.15
Total	37.32	37.96	1.68	1.12	62.00	103.74	89.43	14.81	0.03	0.38

Net Metering Cost - Rs./Million	FESCO	GEPCO	HESCO	SEPCO	IESCO	LESCO	MEPCO	PESCO	TESCO	QESCO
January	155	141	16	7	206	401	585	78	0	3
February	287	275	14	11	440	948	754	124	0	3
March	565	609	16	12	1,028	1,452	1,076	197	0	4
Total	1,008	1,025	45	30	1,674	2,801	2,414	400	1	10



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**Additional Note of Member (Technical)**  
**Regarding**  
**Quarterly Adjustment of XWDISCOs for 3rd Quarter 2024-25**

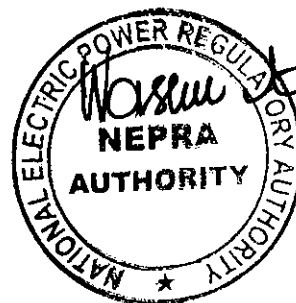
It is noted that the capacity claimed by XWDISCOs for the 3rd quarter of FY 2024-25 amounted to Rs. 362.395 billion, which is significantly lower than the reference figure of Rs. 459.286 billion. During the same period, electricity sales stood at 19,968 GWh compared to a reference of 21,846 GWh in the corresponding reference period.

2. Ordinarily, a decline in electricity sales would result in an upward adjustment in capacity charges due to the fixed-cost nature of capacity payments. However, during this quarter, the termination of certain Power Purchase Agreements (PPAs) and other adjustments related to Independent Power Producers (IPPs) operating within the system have contributed to a reduction against the projected capacity payment. Consequently, this has led to a negative adjustment in the 3rd quarter of FY 2024-25.

3. Although the quarterly adjustment for the 3rd quarter of FY 2024-25 has decreased significantly, enhanced governance and more efficient system operations could have further improved electricity sales, potentially leading to an even greater reduction in the adjustment amount. In this regard, the following points are outlined for consideration and focused action by the relevant stakeholders:

- It has been observed that GENCO-II (Guddu Old), GENCO-III (TPS Muzaffargarh), and GENCO-I (Jamshoro Power Company Limited) collectively claimed capacity payments totaling Rs. 1.237 billion during the quarter—Rs. 469 million, Rs. 350 million, and Rs. 418 million respectively—despite generating no electricity during this period. These plants are characterized by high generation costs and poor operational efficiency, with little to no likelihood of receiving despatch orders from the system operator in the future, given the availability of abundant and more cost-effective surplus capacity in the system. Continuing capacity payments to such non-operational and inefficient assets imposes an unnecessary financial burden on both the power sector and end consumers. A targeted and strategic review is therefore essential to rationalize these expenditures and improve overall sector's efficiency.
- In addition to other issues, transmission constraints continue to limit the utilization of several cost-effective power plants located in the southern region, notably Port Qasim, China Power, and Lucky Electric. Despite their potential to provide affordable electricity, these plants have reported extremely low utilization factors—approximately 1% for Port Qasim, 10% for China Power, and 0% for Lucky Electric—during the quarter. Nevertheless, they have claimed substantial capacity payments amounting to Rs. 26.95 billion, Rs. 30.88 billion, and Rs. 11.26 billion, respectively. In total, around Rs. 69.09 billion has been claimed in capacity charges despite minimal generation. This reflects a major inefficiency in the system and underscores the urgent need to address transmission bottlenecks and improve generation dispatch practices to ensure optimal use of available low-cost generation resources.

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