

Registrar - NEPRA,
NEPRA Tower, Attaturk Avenue (East),
Sector G-5/1, NEPRA
Islamabad

Ref # KE/BPR/NEPRA/2018/817
December 18, 2018

Subject: KE'S APPLICATION FOR REVIEW UNDER RULE 16 (6) OF THE NEPRA TARIFF (STANDARDS AND PROCEDURE) RULES 1998 READ WITH REGULATION 3 (2) OF THE NEPRA (REVIEW PROCEDURES) REGULATIONS, 2009 REGARDING THE DECISION OF THE AUTHORITY IN THE MATTER OF REQUEST FILED BY KE FOR APPROVAL TO UTILIZE RLNG AS AN ALTERNATE FUEL FOR ITS GENERATION PLANTS

Dear Sir,

We write with reference to NEPRA letter # NEPRA/TRF-1362/K-Electric-2016/18930 dated December 7, 2018 (hereinafter referred to as 'the Decision').

In this regard, KE is filing Application for Review pursuant to Rule 16 (6) of the NEPRA Tariff (Standards and Procedure) Rules 1998 read with Regulation 3 (2) of the NEPRA (Review Procedures) Regulations, 2009 enclosed as **Annexure A** along with other additional documents as follows:

- i. Board Resolution along with General Power of Attorney are enclosed as **Annexure B and C**
- ii. Authorization letter in favor of signatory is enclosed as **Annexure D**
- iii. Affidavit of Deponent is enclosed as **Annexure E**

Further Review Fees calculated in accordance with Schedule of NEPRA (Review Procedures) Regulations, 2009 amounting to Rs. 1,000/- is enclosed with this letter as cheque # 19455866 dated 23.11.18.

Sincerely,



Ayaz Jaffar Ahmed
Director - Finance and Regulations

Enclosure: Annexures A - E

For information & n/a A.
— DRO I / Dly-I
2012 18
— SACT - I
— SACT (eh)
— DG (MSE)
— ADG (U-)
— LA (KIP)
— MF

cc: chairman
M(T)/M(MSE)
M(CA)
M(CU)

Received along with cheques Rs. 1000/-

REGISTRAR
Dy. No.: 12409
Dated: 20/12/18

ANNEXURE A

**BEFORE THE NATIONAL ELECTRIC POWER REGULATORY AUTHORITY (NEPRA) APPLICATION
FOR REVIEW IN THE MATTER OF DECISION OF NEPRA NO. NEPRA/TRF-362/K-ELECTRIC -
2016/18930 DATED DECEMBER 07, 2018 RELATING TO REQUEST FILED BY KE FOR
APPROVAL TO UTILIZE RLNG AS ALTERNATE FUEL FOR ITS GENERATION PLANTS [CASE #
NEPRA/TRF-362/K-ELECTRIC-2016]**

REVIEW

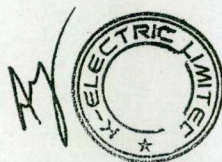
KE is filing this Application for Review (**Application**) Rule 16 (6) of the NEPRA Tariff (Standards and Procedure) Rules 1998 (**Tariff Rules**) read with Regulation 3 (2) of the NEPRA (Review Procedures) Regulations, 2009 (**Review Regulations**) in the matter of Decision of NEPRA dated December 07, 2018 (**the Decision**) relating to request filed by KE for approval to utilize RLNG as alternate fuel for its generation plants for the perusal of NEPRA.

SUMMARY OF REVIEW

In this regard, KE requests NEPRA to review the following:

I. Utilization of Minimum 130 MMCFD of Local Gas

- That pursuant to CCOE decision dated April 23, 2018, SSGC is supplying local gas up to 130 MMCFD on '**as and when available basis**' and not on firm basis.
- While, KE has reached out to the court and there are orders in field that restrict SSGC against any reduction in the supply of local gas from 130 MMCFD, SSGC unilaterally reduces the local gas below 130 MMCFD. Accordingly, NEPRA is requested to modify the Decision and remove the requirement of utilizing minimum 130 MMCFD gas and allow RLNG after consumption of local gas on '**as and when available**' basis as SSGC is not supplying on firm basis.

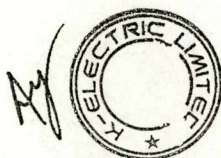


II. Performance Test of BQPS-I on Local Gas/RLNG

- That **technical limitation of units 3 and 4 of BQPS I, allows them to operate up to a maximum of 25% on RLNG/Local Gas** which has also been informed to NEPRA through KE's request for modification of its generation license # KE/BPR/NEPRA/2018/176 dated April 23, 2018
- Owing to aforementioned limitation, performance tests of Units 3 and 4 of BQPS I solely on gas/RLNG are not possible and that KE can only conduct performance tests on Local Gas/RLNG on Units 1, 2, 5 and 6 of BQPS-I, whereas performance tests on 100% Furnace Oil firing can be conducted on all six (06) units of BQPS I.
- Accordingly, in view of aforementioned, NEPRA is requested to review/amend its Decision accordingly.

III. Commissioning of BQPS-II and KCCPP on HSD

- That post availability of RLNG, the redundancy of BQPS-II and KCCPP has been **avoided** and therefore in our view adding HSDO as an alternative fuel will lead to increase in tariff and burden the GOP/consumer unnecessarily
- The aforementioned statement duly corroborates with the fact that even other plants who have HSD enlisted as an additional alternate fuel in their generation licenses are **seeking addition of RLNG being cheaper as another alternate fuel in their generation licenses.**
- Accordingly in view of aforementioned facts, KE humbly requests NEPRA to reassess and reevaluate its Decision.



DETAILED GROUNDS OF APPLICATION FOR REVIEW

Detailed grounds supporting KE's application for review are mentioned below for your kind perusal:

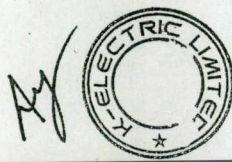
i. FINDINGS ON THE ARRANGEMENT BETWEEN KE AND SSGC FOR SUPPLY OF RLNG AND LOCAL(INDIGENOUS) GAS [PARA 16.1 (i)]

SSGC is supplying 60 MMCFD of RLNG to KE on a "firm/100 % take or pay basis", whereas supply of local gas up to 130 MMCFD is being made on "as and when available basis". To ensure supply of local gas, KE has reached out to the court and has filed CP D-4615 of 2018 (KE Vs Federation of Pakistan and others) wherein both SSGC and OGRA are co-respondents. Further, in light of interim order in CP # D-4615 dated June 13, 2018 (Copy of order enclosed as Annexure A1), which still holds the field, SSGC was directed to supply same quantity of gas as on the date of the order i.e. 130 MMCFD of local gas and 60 MMCFD of RLNG. However, SSGC unilaterally reduces the gas supply from 130 MMCFD and provides it on 'as and when available' basis, which is beyond the control of KE.

Therefore, in view of above submissions, NEPRA is humbly requested to amend its Decision and remove the requirement/compulsion to utilize 130 MMCFD of local gas prior to using RLNG, as SSGC is supplying Local Gas on 'as and when available' basis, while KE will pursue the matter at legal forum to get due supply of Local Gas.

ii. FINDINGS ON THE CARRYING OUT OF PERFORMANCE TESTS OF BQPS I ON LOCAL GAS/RLNG [PARA 16.1 (iii)]

KE in line with the directions of NEPRA as stipulated in the Multi Year Tariff Determination of KE (Determined MYT 2017) is in the process of carrying out performance (capacity & heat rate) tests at BQPS I as well as on other of its generating plants. However, regarding



directions of NEPRA to conduct performance test of BQPS I solely on local gas/RLNG, it is submitted that as per the technical limitation, Unit 3 and 4 can only operate up to a maximum of 25% on local gas/RLNG. Accordingly in view of aforementioned, it is only possible to conduct the performance test on 100% Local Gas/RLNG firing on Units 1, 2, 5 and 6 of BQPS I, whereas performance tests on 100% Furnace Oil can be carried out on all six (06) units of BQPS I. Therefore, in view of aforementioned, NEPRA is requested to review and amend its Decision in light of facts narrated herein.

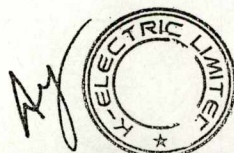
iii. **FINDINGS ON IMPLEMENTATION OF EARLIER DIRECTIONS OF NEPRA REGARDING COMMISSIONING OF KCCPP AND BQPS II POWER PLANTS ON HSD [PARA 16.1 (iv)]**

With post availability of RLNG the redundancy of BQPS-II and KCCPP has been avoided. Further, increased cost of operations on HSD and its intensive maintenance requirements will increase the tariff and burden GOP/consumer unnecessarily. Details of investments required to be incurred for commissioning KCCPP and BQPS II on HSD are estimated as follows:

PARTICULARS	PLANT	QUANTITY	HSD RATE (Rs/Ltr) ¹	TOTAL COST (PKR MILLIONS) ²
Commissioning Cost	KCCPP	-	-	580
	BQPS-II	-	-	970
Total Commissioning Cost				1,550
Fuel Cost				
Fuel cost - Mandatory running of plants	KCCPP	No minimum requirement to run on HSDO	-	-
	BQPS-II	2,787,571 Liters / Year / 3 GT	110.94	309 / year
Total Fuel Cost				309 / year
Inventory cost				
HSDO Storage - Minimum Inventory to be kept	KCCPP	9,500,000 Liters (5.5 Days Storage)	110.94	1,054
	BQPS-II	10,000,000 Liters (4 days Storage)		1,109
Total Inventory Cost				2,163

¹ including GST

² These are estimated amounts based on exchange rate of PKR 145 / USD and are subject to change



Further, brief analysis of per unit cost on HSD as compared to other fuels is detailed below:

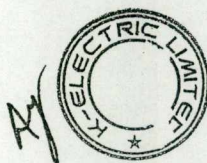
Comparison of per unit cost on different fuels

Plant name	Local gas	RLNG	HSD
	Cost per unit sent out* - PKR/ kWh		
BQPS 2	5.03	14.12	21.54
KCCP	5.34	15.01	22.91

** Cost per unit is based on heat rates given by NEPRA in MYT review decision. For comparative purpose, same heat rates & auxiliary consumption has been used for all fuel types. Actual efficiencies on HSD can be ascertained at commissioning, however, these are usually less efficient than on Gas*

In this regard, KE through its letter # KE/BPR/NEPRA/2018/389 dated July 09, 2018 (copy of KE letter enclosed as **Annexure A2**) in addition to seeking clarity from NEPRA whether the aforementioned investment related to commissioning of KCCPP and BQPS II on HSD will be allowed in tariff has also shared its opinion that post availability of RLNG, the redundancy of BQPS II and KCCPP has been avoided, therefore addition of HSD as an alternate fuel will unnecessarily burden the consumer/GoP. Further, KE has also requested NEPRA for a meeting with NEPRA to discuss and deliberate the plan, which shall enable KE to proceed and decide in an informed manner; response to KE's request of meeting is still awaited.

Accordingly in view of above, we humbly request NEPRA to reconsider its Decision in the best interests of the consumers and grant KE's request for a meeting so that the matter is deliberated upon and way forward is decided to enable KE to proceed in an informed manner.

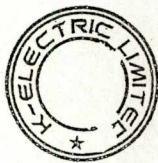


STATEMENT OF PRAYER

In light of above facts, evidences, preliminary objections, grounds and circumstances, NEPRA is requested to review its findings, evaluations and analysis and it is therefore prayed:

- (i) That the Application for Review is accepted;
- (ii) That the directive of NEPRA as entailed in Paras 16.1 (i) to (iv) of the Decision are reviewed on the basis of above mentioned findings;
- (iii) That it is further prayed that KE may be allowed an opportunity of being heard in keeping with the principles of natural justice.

Please be informed that KE further reserves its right to adduce further and additional grounds of objection at the time of personal hearing in this matter. Moreover, this application is being filed without prejudice to KE's right to raise this matter at any other forum available to it whether it be legal or otherwise and further without prejudice to any ongoing or future proceedings whether instituted by KE or otherwise before any competent forum with regard to supply and availability of gas.



Authorized Person

IN THE HIGH COURT OF SINDH, AT KARACHI

C.P. No. D- 4615 of 2018

K-Electric Limited.....Petitioner
Versus
Federation of Pakistan and others..... Respondents

ORDER

13.06.2018

Mr. Ayan Mustafa Memon advocate.

1. Urgency granted.
2. Deferred.
3. Exemption is granted subject to all just legal exceptions.

4&5. Through instant petition, petitioner has impugned the letter dated 24.05.2018 issued by Sui Southern Gas Company Limited whereby, according to learned counsel, petitioner has been threatened that five TORs submitted by the Sui Southern Gas Company Limited have not been signed, therefore, gas supply to the petitioners will be reduced. Learned counsel for the petitioner submits that TORs between petitioner and S.S.G.C Ltd were duly agreed and initialed by the CEO, K-Electric and Acting Managing Director of Sui Southern Gas Company Limited subject to approval by the Board of Directors of both the parties. However, according to learned counsel, respondents have unilaterally changed such TORs, and asking the petitioners to sign the same. Per learned counsel, the disputes relating to payments between petitioners and the respondents, SSGC Ltd as well as Karachi Water and Sewerage Board were taken up before the Federal Cabinet Committee on energy under the chairmanship of Prime Minister, who vide their decision dated 23.4.2018, resolved that TORs for reconciliation of the dues between

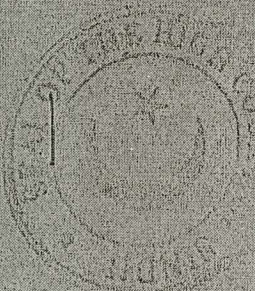
Sui Southern Gas Company Limited and K-Electric as well as Karachi Water and Sewerage Board will be finalized within fifteen days, whereas such process was to be supervised by the Advisor to Prime Minister. However, according to learned counsel, in view of completion of the term of previous Government, and formation of new setup of Interim Government, the TORs could not be finalized, however, respondents intend to reduce the gas supply to the petitioner in totally arbitrary manner. Per learned counsel, the petitioner is still willing to resolve the dispute and to sign the TORs as may be agreed between the petitioners and SSGC Ltd pursuant to Cabinet's decision as referred to hereinabove, therefore requests that respondents may be directed not to violate the decision of the cabinet committee, as according to learned counsel, reduction in the gas supply will result in substantial shortfall in Electricity Supply to the public at large.

Let pre admission notice be issued to the respondents as well as DAG for 20.06.2018 when comments shall be filed with advance copy to learned counsel for the petitioner. Till next date of hearing, respondents shall not take any action against the petitioner in violation of the decision of the cabinet committee as referred to hereinabove, including reduction of Gas Supply provided petitioner continues to pay current bills regularly. In the meanwhile, parties shall make all possible efforts to ensure compliance of the aforesaid decision and to settle the dispute by signing the TORs as per Cabinet's decision.

Sd/-(Judge)
Sd/-(Judge)

Certified to be true

Assistant Registrar Writ.



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Mr. Syed Safeer Hussain,
Registrar NEPRA,
NEPRA Tower, Attaturk Avenue (East),
Sector G-5/1, Islamabad

Ref # KE/BPR/NEPRA/2018/389
July 9, 2018

Subject: Commissioning of KCCPP and BQPS II on HSDO – Update

Reference:

NEPRA letter # NEPRA/SA(Tech)/LAD-01/6433 dated April 18, 2018
KE letter # KE/BPR/NEPRA/2018/198 dated April 30, 2018

Dear Sir,

We write in furtherance to KE letter dated April 30, 2018 to apprise NEPRA about the status of commissioning of KE plants namely Korangi Combined Cycle Power Plant (KCCPP) and Bin Qasim Power Station II (BQPS-II) on alternative fuel i.e. High Speed Diesel Oil (HSDO).

As per directives of NEPRA conveyed through NEPRA letter dated April 18, 2018, an initial assessment along with due diligence for operation of KCCPP and BQPS II on HSDO has been performed by KE and OEM Contractor, subsequent to which OEM contractor has shared the liquid fuel commissioning proposal along with cost and timelines with KE. Further, through preliminary assessment it has been noted that since the existing infrastructure is more than seven (07) years old and has not been commissioned on HSDO, therefore rehabilitation and additionally, development of civil systems is required at both stations. Some of the major works required to be performed at these stations are as follows:

- Rehabilitation of HSDO storage tanks.
- Interconnection works of pipelines and necessary modifications.
- Overhauling of fuel forwarding pumps.
- Repairing and commissioning of firefighting and fire detection system
- Construction of civil structure for receiving and decanting of Liquid Fuel.

As per initial evaluation, the total commissioning cost required to be incurred amounts to PKR 1,527 million approximately, of which PKR 585 million pertains to KCCPP and PKR 942 million to BQPS-II. Moreover, as per the timelines given by OEM contractor, it would take almost 08 months from start of the contract to commission both KCCP and BQPS-II on HSDO along with requirement of shutdowns for few days to complete the commissioning works. The timelines of some of the activities required are as follows:



ACTIVITIES	TIMELINE
Supply of Materials & Rehabilitation works	~ 7 months (22 Weeks lead Time of material)
Gas Turbines (GTs) Commissioning	7 Days / GT
Civil Works (Receiving and Decanting System of Liquid Fuel, Bund Wall for Storage Tanks Etc.)	4 ~ 5 Months (Works to be done in parallel)

It is pertinent to mention that HSDO commissioning will increase the maintenance requirements for both KCCPP and BQPS-II plants and inventory of HSDO will be required to be maintained as well. Further, as advised by the OEM contractor, it would be mandatory to run BQPS-II on HSDO for certain number of hours each year in order to keep the system in operational condition.

Summary of additional operational and minimum inventory cost required is detailed below:

PARTICULARS	PLANT	QUANTITY	RATE (Rs/Ltr)	TOTAL COST (PKR MILLIONS)
Fuel Cost				
Fuel cost - Mandatory running of plants	KCCPP	No minimum requirement to run on HSDO	-	-
	BQPS-II	2,787,571 Liters / Year / 3 GT	119.31	333 / year
Total Fuel Cost				333 / year
Inventory cost				
HSDO Storage - Minimum Inventory to be kept	KCCPP	9,500,000 Liters (5.5 Days Storage)	119.31	1,133
	BQPS-II	10,000,000 Liters (4 days Storage)		1,193
Total Inventory Cost				2,326

Moreover, the cost per unit on HSDO will be 6 times more expensive as compared to Natural Gas. In respect of aforementioned, fuel cost comparison on operation on different fuels for KCCPP and BQPS-II is detailed below for your kind perusal:

PLANT NAME	NATURAL GAS (NG)*	RLNG*	HSDO*
	Cost per unit sent out* - PKR / kWh		
BQPS-II	3.20	11.77	19.99
KCCP	3.40	12.52	21.26

* Cost per unit is based on heat rates given by NEPRA in MYT review decision and current prices of PKR 400/MMBTU of Natural Gas, USD 12.12/MMBTU of RLNG and PKR 91/Liter (excluding GST of 31%) of HSDO.

Further, as mentioned by NEPRA in its directives, the prime objective for generation on alternate fuel was to ensure continuity of supply when faced with constraints in generation due to shortage of primary fuel



and to diversify the risk of resultant load management. In order to meet this objective, KE has already started using RLNG as an alternate fuel to bridge the demand/supply gap due to shortage of local gas. In this regard KE through its letter # KE/BPR/NEPRA/2018/176 dated April 23, 2018 has also filed its application with NEPRA for modification in its Generation License to include RLNG as an alternate fuel.

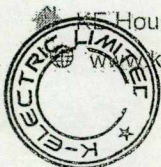
In view of above, KE believes that post availability of RLNG the redundancy of BQPS-II and KCCPP will be avoided and therefore adding HSDO as an alternative fuel will increase the tariff and burden the GOP/consumer unnecessarily.

Therefore, in this regard, we can have a meeting with NEPRA's technical team, if required, to discuss and deliberate the plan which will enable to us to decide and proceed in the informed manner in accordance with the directives of NEPRA.

Sincerely,

Muhammad Aamir Ghaziani
Director – Finance and Regulations

AG





Certified True Copy (CTC) of Resolution(s)
passed by K-Electric Board of Directors at its Meeting No. 1198
held on Thursday, 07 June 2018 at 11:00 hours in KE's Board Room,
3RD Floor, KE House, 39-B, Sunset Boulevard, Phase-II, DHA, Karachi

Re: Appointment of Chief Executive Officer (CEO)

RESOLVED THAT in exercise of powers vested through section 187 and 188 of Companies Act, 2017 and Article 76(ii) and (vi) of K-Electric (KE) Articles of Association, Syed Moonis Abdullah Alvi be and is hereby appointed as interim Chief Executive Officer of the Company in place of Mr. Muhammad Tayyab Tareen with effect from 07 June 2018.

RESOLVED THAT a General Power of Attorney as per draft set out in Appendix "A" be and is hereby given to Syed Moonis Abdullah Alvi, CEO, K-Electric and any two (2) Directors of the Company be and are hereby jointly authorized to sign, on behalf of the Board of Directors, the General Power of Attorney for Syed Moonis Abdullah Alvi and affix common seal of the Company on the instrument.

Muhammad Rizwan Dalia
Company Secretary

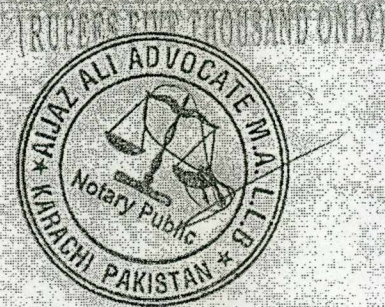
MUHAMMAD RIZWAN DALIA
Company Secretary
K-ELECTRIC LIMITED

254887



STAMP OFFICE CITY COURT, KARACHI

Issued to: K. Electric
 CNIC/LEG No: 42101-6298941-9
 Vide DSR No: 02 Dt: 11-6-18
 On behalf of Challan No: 21 Dt: 11-6-18
 for the purpose of: Asst.
 Entry No: 02 Dt: 11-6-18



[Signature]
 In Office Karachi

GENERAL POWER OF ATTORNEY

TO ALL TO WHOM these presents shall come, K-ELECTRIC LIMITED (KE), having its registered office at KE House, 39-B, Sunset Boulevard, Phase-II, DHA, Karachi (hereinafter called the "Company") send greetings.

WHEREAS the Company was incorporated under the Companies Act 1882 as a company limited by shares and continues to operate as such under the Companies Act, 2017.

AND WHEREAS by virtue of the powers conferred upon them by Article 77 of the Company's Articles of Association, the Board of Directors of the Company have passed the resolution dated 07 June 2018 and entrusted to and conferred upon Syed Moonis Abdullah Alvi, the Chief Executive Officer of the Company, the following powers which shall be exercisable by him from the date that a Power of Attorney enumerating the same is executed in his favor by any two (2) Directors of the Company.

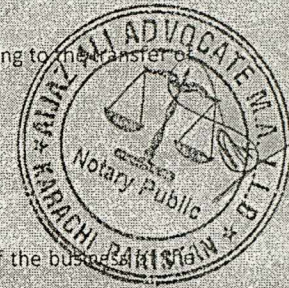
NOW THESE PRESENTS WITNESS THAT Syed Moonis Abdullah Alvi son of Syed Riazuddin Alvi CNIC # 42201-6886191-3, the Chief Executive Officer of the Company, is hereby appointed Attorney of the Company to act in the name and on behalf of the Company to do and perform the following acts and things only:

- 1) To purchase, sell, endorse, transfer, negotiate, encash, receive interest or otherwise deal in securities of all kinds including Government of Pakistan securities and securities of the Provincial Governments of Pakistan;
- 2) To sign all registers, reports and returns and others documents as may be required by law to be signed or filed with any Federal, Provincial or Local Governmental authority including but not limited to the Securities and Exchange Commission of Pakistan, Stock Exchanges, Registrar Joint Stock Companies, State Bank of Pakistan and Income Tax, Customs and other authorities;

[Signature]

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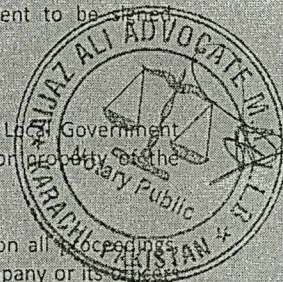
- 3) To sign all acceptances and endorsements on bills of exchanges, hundies, securities and cheques drawn on behalf of the Company and to receive the amount of bills, hundies, securities and cheques and to give receipts and discharge for the same and to sign all documents drawn on or by the Company to which the signature of the Company as agents is required;
- 4) To sign for and on behalf of the Company all documents, assurances, deeds, and matters or things in or about the business of the Company as fully and effectively as the Company could do if personally present, to present such documents and deeds to the registering authority and admit execution thereof;
- 5) To process certificates of shares of the Company and to sign all papers relating to the transfer of shares including temporary receipts thereof;
- 6) To process Dividend Warrants and their revalidation;
- 7) To authenticate and or cancel the registration of Debentures;
- 8) To sign all correspondence that may be necessary in the ordinary course of the business of the Company;
- 9) To sign all deeds of sale, purchase, lease, mortgage, redemption, re-conveyance and present them before the registering authority and admit execution thereof;
- 10) To execute all bonds, deeds and documents and give such security as may be required now or at any future time by the Government of Pakistan or by any person, corporate body, company or firm, to enable the Company to carry on its business;
- 11) To appoint and authorize any officer of the Company as his agent or agents to admit execution of deeds and documents of whatsoever nature before the registering authority and to revoke such appointment or appointments;
- 12) To sign, execute, determine or terminate and negotiate terms and conditions thereto agreements/appointment for employment and training with employees and trainees, in line with requirements of the Companies Act 2017 and Code of Corporate Governance Regulations 2017 as applicable;
- 13) To sign for and on behalf of the Company all documents, agreements, contracts, assurances, deeds, matters or things in or about the business of the Company as fully and effectively as the Company could do personally and to present such documents, agreements, contracts, assurances, deeds, matters or things to the registering authorities and appear before such authorities and admit execution thereof and to do all such other things and acts that may be necessary for registration;
- 14) To make and sign applications to appropriate Federal, Provincial or Local Government departments, authorities or other competent authority for all and any licenses, filing of any and all applications, petitions with NEPRA which include Licensee Proposed Modifications (LPMs) and others, permissions and consents required by any order, statutory instrument, regulation, byelaw or otherwise in connection with the business, management and affairs of the Company;
- 15) To obtain securities from any person, corporate body, company or firm for the due performance of any contract in respect of rendering any service or supplying any material to the Company and to accept the same on such terms as may be deemed proper or expedient by the Attorney;
- 16) To realize debts due to the Company and to receive any money due to the Company from any person, corporate body, company or firm and to grant receipts and discharges for the same;
- 17) To make payments to any person, corporate body, company or firm for any service rendered to the Company and for such other purposes of the Company and for carrying on of the Company's business and to sign and deliver all receipts, charges and drafts on the bank and other accounts of the Company or on the customers of the Company and to endorse all bills and bills of



Wm.

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exchange received by the Company which may be necessary or expedient to be signed, endorsed or given for the purpose of carrying on of the Company's business;



- 18) To represent the Company before any Court of law, Federal, Provincial or Local Government authority or any other authority in all matters concerning the business or property of the Company;
- 19) To commence, institute, prosecute, and to defend, compound and abandon all actions, suits, petitions, appeals, claims and demands by or against the Company or its officers in relation to the business or property of the Company or otherwise and for such purpose to sign, verify and present any document, pleading, complaint, writ, affidavit application or other instrument in writing and to appear and make statements on oath or otherwise in relation to the affairs of the Company and to appoint and remunerate any barrister, solicitor, advocate, pleader, vakil, mukhtar, or any legal practitioner or any revenue agent, accountants, valuers or surveyors for the said purpose and to obtain legal advice on behalf of the Company on any matter, contentious or otherwise, affecting the Company;
- 20) To write off amounts as approved by the Board of Directors arising as a result of correction / cancellation / adjustment of electricity bills in the normal course of business of the Company. To approve formula for write offs, adjustment and settlement of electricity bills based on prudent business practices / judgement and within the policy framework approved by the Board of Directors. To sub-delegate such of the powers as he deems fit to the concerned executives / officers of the Company, to fix authority limits, thereof, and to revoke the same at his discretion.
- 21) To obtain refund of stamp duty or repayment of court fees;
- 22) To appear and act in the offices of the District Registrar and Sub- Registrar of Deeds and Assurances for registration of documents and in any other office of the Federal, Provincial and local Government, including without prejudice to the generality of the foregoing, City District Government Karachi, any Union Council, District Council, Cantonment Board, Municipal Corporation, any Co-operative Society, State Bank of Pakistan, Collector of Customs, Excise & Taxation Offices and the Chief Controller of Imports and Exports in all matters concerning the business or property of the Company;
- 23) To file and receive back documents, to deposit and withdraw money and to grant receipts therefore;
- 24) To negotiate and to enter into and complete contracts with any person, corporate body, company or firm for the lease or purchase of any lands and buildings and to alter, repair, add to, and improve any building or structure and to let or sub-let any immovable property held by the Company and to submit plans of buildings relating to the Company's properties or lands on the Company's behalf before any competent authority and to obtain receipts therefor;
- 25) To use, sign and attest the name and style of the Company in any transaction, deed, document or muniment of title on all such occasions as may be necessary or expedient for conducting the business of the Company or for the due and proper management of the lands and buildings leased or purchased or to be leased or purchased by the Company and to execute and sign all such deeds and documents as may be required or proper for or in relation to all or any of the matters or purposes aforesaid;
- 26) To delegate to any person such of the powers as he deems fit and revoke the same at his discretion.
- 27) Generally to do all other acts and things incidental to the exercise of the aforesaid powers; and
- 28) The Company hereby agrees to ratify and confirm all and whatever the said Attorney shall lawfully do or cause to be done by virtue of this Power of Attorney.

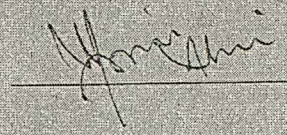
A handwritten signature in black ink, appearing to be "M. Karachi".

4

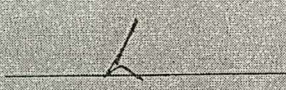
The Power of Attorney executed in favor of Mr. Muhammad Tayyab Tareen pursuant to the Resolution of the Board of Directors passed on 27 November 2014 is hereby revoked. This Power of Attorney will be valid till the time Syed Moonis Abdullah Alvi holds the position of Chief Executive Officer of KE.

IN WITNESS WHEREOF the Common Seal of the Company has been affixed hereto at Karachi on this the 11 day of June 2018 by the undersigned Directors of the Company pursuant to the resolution dated 07 June 2018 passed by the Board of Directors of the Company.

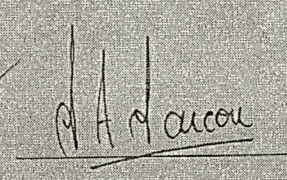
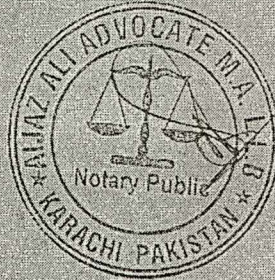
Signature of Syed Moonis Abdullah Alvi
Attorney



THE COMMON SEAL of
the Company is hereunto
affixed in the presence of

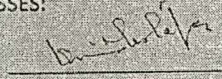



Director

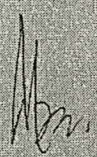


Director

WITNESSES:

1. 
Anjad Mustafa
42201-7393750-3

2. 
MUHAMMAD ARIF
42401-1568587-5



ATTESTED
AJAZ ALI ADVOCATE M.A. LL.B
Advocate & Notary
Public Karachi,

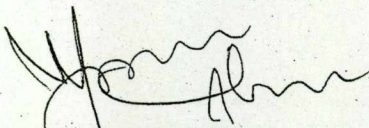
12 JUN 2018

Dated: December 17, 2018

AUTHORITY LETTER

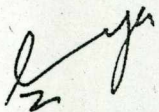
I, Syed Moonis Abdullah Alvi, s/o Syed Riazuddin Alvi, Chief Executive Officer (CEO) of the K-Electric Limited, is authorized by the Board of Directors (BOD) of the Company by virtue of Clause 26 of the General Power of Attorney dated 11th June 2018 (attached), which empowers me to nominate any officer of the Company, as I deem fit, to sign and file review petition with National Electric Power Regulatory Authority (NEPRA) and such other deeds, documents, instruments, etc. and take all necessary actions incidental and related to review petition and appear before the Authority and admit execution thereof for and behalf of the Company.

Now, therefore, in exercise of powers vested in me by the BOD of the Company, I, hereby authorize Ayaz Jaffar Ahmed s/o Jaffar Ahmed, having CNIC # 42000-5311358-3, Muslim, adult, resident of Flat No. 306, Barkati Mahel, Jamshed Road No.3, Karachi, Director-Finance and Regulations, KE to sign and file review petition with NEPRA against the Order of NEPRA dated December 07, 2018 in the matter of request filed by K-Electric Ltd. for approval to utilize RLNG as Alternate Fuel for its Generation Plants along with such other deeds, documents, instruments, etc. and take all necessary actions incidental and related to review petition and appear before the Authority for and behalf of the Company.



Syed Moonis Abdullah Alvi
Chief Executive Officer
K-Electric Limited

Authorized Person:



Ayaz Jaffar Ahmed
Director Finance and Regulations
K-Electric Limited



ZIZ AHMED STAMP VENDOR

Licence No. 52, Seating No. 62, City Court, Karachi

PROT. 1227 DATE

17 OCT 2018

RUPEES ONE HUNDRED ONLY

Stamp Vendor's Address: MUSHTAQ AHMED JOYIA

Stamp Vendor's Address: Advocate High Court

Stamp Vendor's Address: Led. No. 10705/H.C. Khl.

Stamp Vendor's Signature

Application for Review filed by K-Electric Limited (KEL) against the Order of the Authority dated December 07, 2018 in accordance with Rule 3 (2) of the NEPRA (Review Procedure) Regulations, 2009 regarding Decision of the Authority in the Matter of Request Filed by KEL for Approval to Utilize RLNG as an Alternate Fuel for its Generation Plants

AFFIDAVIT

I, Ayaz Jaffar Ahmed s/o Jaffar Ahmed, having CNIC # 42000-5311358-3, Muslim, adult, resident of Flat No. 306, Barkati Mahel, Jamshed Road No.3, Karachi, Director Finance and Regulations – KE, do hereby solemnly affirm and declare as under:

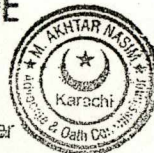
1. That I am the applicant in the subject matter and well conversant with the facts of the case.
2. That the accompanying application has been filed under my instructions, the facts mentioned therein are true and correct and the contents of the application whereof may kindly be read and treated as part of the Affidavit, for the sake of brevity.
3. That, I am authorized to sign and file this review petition with NEPRA such other deeds, documents, instruments, etc. and take all necessary actions incidental and related to this review petition and appear before the Authority for and behalf of the Company
4. That it would be in the larger interest of justice that the accompanying application is granted as prayed.
5. That whatever stated above is true and correct to the best of my knowledge and belief.

Dated: December 17, 2018

Deponent

SWORN BEFORE ME

M. AKHTAR NASIM
Advocate & Oath Commissioner
Karachi



18 DEC 2018