SENATE OF PAKISTAN

PAKISTAN SENATE

House of the Federation

SEVENTEENTH PARLIAMENTARY YEAR 2019-2020

REPORT NO. 01 OF 2020

SPECIAL REPORT OF THE SENATE STANDING COMMITTEE ON POWER

ON

"TO REVIEW THE ISSUES OF HIGH TARIFF, CAPACITY CHARGES, HEAT RATES ND CALCULATION OF PAY BACK PERIODS OF IPPS"

PRESENTED BY

SENATOR FIDA MUHAMMAD

(CHAIRMAN COMMITTEE)

SENATE SECREARIAT

SPECIAL REPORT OF THE SENATE STANDING COMMITTEE ON POWER REGARDING EXCESS PROFITS PAID TO RFO BASED IPPS

I, Senator Fida Muhammad, Chairman Senate Standing Committee on Power have the honor to present the Special Report of the Committee on excess profits paid to RFO based IPPS.

2. The composition of the Committee is as follows:-

1.	Senator Fida Muhammad	Chairman
2.	Senator Syed Shibli Faraz	Member
3.	Senator Nauman Wazir Khattak	Member
4.	Senator Ahmed Khan	Member
5.	Senator Agha Shahzaib Durrani	Member
6.	Senator Mushahid Ullah Khan	Member
7.	Senator Dilawar Khan	Member
8.	Senator Dr. Ghous Muhammad Khan Niazi	Member
9.	Senator Moula Bux Chandio	Member
10.	Senator Syed Muhammad Ali Shah Jamot	Member
11.	Senator Muhammad Akram	Member
12.	Senator Molvi Faiz Muhammad	Member
13.	Senator Siraj ul Haq	Member
14.	Minister for Power	Ex-Officio Member

3. In pursuance of sub-rule (1) of Rule 183 of the Rules of Procedure and Conduct of Business in the Senate, 2012, the Standing Committee on Power, in its meeting held on 15th May, 2019 constituted a three member Sub-Committee to look into the issue of excess profits paid to RFO based IPPS. The composition and Terms of Reference of the Sub-Committee are given as under:-

COMPOSITION

i.	Senator Nauman Wazir Khattak	Convener
ii.	Senator Muhammmad Akram Khan	Member
iii.	Senator Agha Shahzaib Khan Durrani	Member

TERMS OF REFERENCE

"To review the issues of high tariff, capacity charges, heat rates and calculation of pay back periods of IPPs."

4. The Sub-Committee accordingly held its meetings on 9th July, 2019, 26th July, 2019, 1st August, 2019 and 21st August, 2019 at Parliament House, Islamabad. During the Sub-Committee's meetings threadbare discussions were held on the TOR mentioned above.

5. The Sub-Committee, after thorough deliberations, presented its report to the main committee during its meeting held on 11.11.2019. The Committee unanimously adopted the report of the Sub-Committee and in a subsequent meeting decided to present it before the House as a Special Report of the Committee. Accordingly, the attached Report is being presented before the House.

(Kamal Ahmad Feroz)
Secretary Committee

(Senator Fida Muhammad)
Chairman
Senate Standing Committee on Power

Annex-A

SENATE SECRETARIAT

REPORT OF THE SUB-COMMITTEE OF THE STANDING COMMITTEE ON POWER
Regarding Excess profits to RFO based Independent Power Producers

1. Senator Nauman Wazir Khattak, Convener of the Sub-Committee of the Senate Standing Committee on Power, have the honor to submit, on behalf of the Sub-Committee, this report to the main Committee.

2. In pursuance of the sub-rule (1) of the Rule 183 of the Rules of Procedure and Conduct of Business in the Senate, 2012, the Standing Committee on Power, in its meeting held on 15th May, 2019 constituted a three (3) member Sub-Committee. The composition and the Terms of Reference of the Sub-Committee are given as under:-

COMPOSITION

i.	**Senator Nauman Wazir Khattak**	**Convener**
ii.	**Senator Muhammmad Akram Khan**	**Member**
iii.	**Senator Agha Shahzaib Khan Durrani**	**Member**

TERMS OF REFERENCE

"To review the issues of high tariff, capacity charges, heat rates and calculation of pay back periods of IPPs."

3. The Sub-committee accordingly held its meetings on 9th July, 2019 at Parliament House, 26th July, 2019 at Parliament House, 1st August, 2019 at the office of National Electric Power Regulatory Authority (NEPRA), Islamabad and 21st August, 2019 at Parliament House, Islamabad. During the Sub-Committee's meetings threadbare discussions were held on the TOR mentioned above.

4. Energy is the Life blood of a country and electricity in particular is the engine of growth and industrial development for any developing country. The agenda at hand was therefore of utmost importance as the future of Pakistan's Power sector stability was dependent on it. The Sub-Committee discussed in detail elements of high tariff, capacity charges, heat rates, payback period and the financial

calculation leading to higher profits. A detailed analysis was presented by the Convener as to how over payments to IPPs have enhanced the impact of IPPs on circular debt. The Financial analysis also included an elaborate review of IPPs namely Atlas Power, Nishat Chunian, Nishat Power, Liberty Power and Attock Gen - during the period from 2012 to 2018.

5. The Committee observed that some of the aforementioned IPPs enjoyed substantially higher ratios of profits than the rate of returns allowed by NEPRA being calculated on the basis of 15% Return on Equity (RoE).
This needed to be looked into. NEPRA was of the view that payments were made following the international standards and that more than one financial principle of cash flow and accounting had been applied.

6. The Committee was not satisfied with NEPRA's explanation and asserted those IPPs which have earned excessive profits due to misrepresenting or hiding any information from the regulator had caused the higher than allowed return. These IPPs must return the additionally earned illegal amount to the consumers of Pakistan. A list of 17 questions was presented to NEPRA for response in the next meeting.

7. In the subsequent meeting NEPRA informed the Committee that the IPPs have got restraining orders from the court and as such the matter was sub-judice. The Committee opined that restraining orders do not bar NEPRA to provide requisite information to the Committee.

8. The Committee maintained that NEPRA has the Powers under the Law to review any determination or investigate any violation of the Act and rules or any wrong doing by Licensees. Therefore, NEPRA should protect consumers' interest by putting a stop to the process of IPPs getting extraordinary profit margins. In this context it was learnt that NEPRA had already taken Suo Motto notice to enquire into the matter of abnormal profits vide NEPRA TRF-IPPs/11660dated 26.9.2013, but later did not pursue these proceedings. These proceedings need to be immediately resumed and pursued at the appropriate level and forum.

9. In view of the very important responsibility to maintain a balance between the interest of Consumers and Service providers, particularly Investors in Generation of Power, the Authority Chairman and Members, representing the provinces are required to be persons of known integrity and eminent professional capability to decide on the complex issues of Electricity regulation. There were strong reservations over the selection process of NEPRA's Chairman and Members. The Committee viewed that Chairman and Members heading various divisions within

NEPRA should be persons of known integrity and competence, possessing adequate relevant qualification and should be selected from the market. The position of Chairman NEPRA is particularly important as he represents the federation and is an interface between the Government with respect to the implementation of the policies laid down by Government and CCI. The committee also recommends a review of the Selection process from the inception of NEPRA in 1997.

10. NEPRA claimed to follow recommended international standards in determining tariff rates, charges and other terms and conditions for supply of electric power services.

11. NEPRA briefed on mechanism of tariff determination. It further informed that three power policies have been introduced till date, first being in 1994, second in 2002 and latest in 2015. Various foreign and local power producers were given incentives and guarantees for production purchase and profits under all the three power policies. Detailed deliberations and threadbare discussions revealed that there were apparently serious malpractices carried out by the IPPs to earn huge illegal profits. This, in the considered opinion of the Committee, could have been avoided if NEPRA had played a more active role in enforcement, particularly in rectifying the matter of excessive profits when it took cognizance of the matter. NEPRA did not appear well prepared on the subject before the Committee and kept justifying its position that it was bound by terms and conditions of the agreements between the successive governments and IPPs and that the matter is sub-judice.

12. The Committee views that the accrual of profits of IPPs are very sensitive to factors other than the allowed rate of Return, such as Fuel cost, Operation and Maintenance (O&M) cost and Financial charges as these constitute more than 90 % of the tariff compared to RoE contributing to only 7% of the tariff. The tariff components with respect to Determination of NCPL are shown in charts attached as Annexures 2 and 3. It is viewed that the reasons of abnormal profits could be the following:

(i) United States CPI rate indexation allowed as per policy of the Federal Government.

(ii) Incorrect or inflated information provided to NEPRA about Cost of Projects and contracts made with EPC contractor and O&M expense contract and efficiency.

(iii) Gains from factors outside tariff, such as "Partial loading"

(iv) Unforeseen savings in cost elements.

(v) Misrepresentation of financial costs to obtain advantage of IPP's profits being Tax free.

(vi) Mismatch between timing of O&M Costs.

Since almost 60 % of the tariff relates to Fuel cost, which is directly dependent on efficiency, the point of efficiency/heat rate was of concern to the Committee, particularly, the matter that the government owned power plants generally have low efficiency/heat rate as compared to private sector power plants.

13. The Committee, however, was not satisfied with the justification given by NEPRA. Based on the financial data provided by NEPRA it was revealed that Atlas Power, Nishat Chunian, Nishat Power, Liberty Power, Attock Gen had obtained an abnormally high profit by deceiving the government and NEPRA. These IPPs gave incorrect information to NEPRA about the projected future expenses and obtained high tariff. This resulted in an average huge profits to the tune of Rs.8 billion per IPP, resulting in high tariff to the end consumer.—

14. Despite strong reservations the Committee was of the opinion that IPPs be given a fair chance to be heard by NEPRA. The committee recommends the following:

i. NEPRA to determine a revised rate for all above IPPs after giving a full opportunity to all IPPs and all stakeholders to express their point of view, contention in the matter.
ii. The recovery of ill-gotten money from the company as well as their initial sponsors.
iii. Initiation of criminal proceedings against the IPPs through an investigation agency along with confiscation of assets.

15. The Committee directed the NEPRA to bring out factual position after hearing the IPPs and submit its report to the Committee for finalization of the report. The Committee further directed to analyze the financial statements of all NEPRA licensees to ascertain the facts in terms of their revenues earned in comparison with the tariff granted by NEPRA based upon their cost estimates.

16. NEPRA was also directed to follow Competitive bidding/reverse bidding process in granting tariffs in future to the IPPs and should abandon the cost plus policy at once. The matter of allowing a competitive market to establish a

reasonable price according to the amended NEPRA Act 2018 needs to be expedited.

RECOMMENDATIONS

i. All five IPP's were evaluated. As per NEPRA the total excess payment is Rs. 39.020 billion with the breakup as below:

Nishat Power	7.116 Billion PKR
Nishat Chunian	7.819 Billion PKR
Attock Gen	11.045 Billion PKR
Liberty Power	9.247 Billion PKR
Atlas Power	3.793 Billion PKR

(Details attached as annexure 1).

The above amounts are to be recovered on immediate basis by CPPAG. Incase IPPs are not willing to corporate; the same should be adjusted in entirety from their upcoming monthly energy payments. Once the above amount has been recovered, only then can the IPPs object to the working provided by NEPRA and upon proof/correction in the NEPRA working, the full or partial amount be refunded to them.

ii. Some of the Tariff elements like Partial Load Adjustment Factor (PLAC), not specifically mentioned in the NEPRA tariff were paid to IPPs, which runs into a few billion rupees. NEPRA to calculate all the amounts paid to IPPs outside the allowed tariff. The said calculation shall be forwarded by NEPRA to CPPAG within 1 month of this committed decision, the said amount as per the calculation of NEPRA is to be recovered on immediate basis by CPPAG. Incase IPPs are not willing to corporate; the same should be adjusted in entirety from their upcoming monthly energy payments.

Once the above amount has been recovered, can the IPPs object to the working provided by NEPRA and upon proof/correction in the NEPRA working, can the amount/partial amount/no amount be refunded to them. CPPAG is responsible for this unauthorized payment of PLAC to IPP's.

iii. The matter of efficiency needs to be further looked into. NEPRA should provide latest efficiency calculations for the past 8 years in respect of all IPPs and estimate an average efficiency for the 25 year period. If the estimated 25-year efficiency is determined to be different than the 45 % efficiency allowed earlier, NEPRA should revise the efficiency for the remaining period through a determination so as to compensate for any excess payments made in this context. Argument of efficiency deteriorating over the period of time does not stand the test of trial since amongst the six; there is a variation in efficiency in the yearly operation for similar engines. Revised tariff determination needs to be decided with 60 days of the order of this committee. All legal requirements and proper hearing to IPPs needs to be accorded to them. In case, for any reasons what so ever, tariff is not determined within 60 days of this order, CPPAG shall not make any monthly energy payments to the IPPs till the revised tariff is provided by NEPRA to CPPAG.

iv. NEPRA did not perform a heat rate test for these thermal power stations at the time of Commercial Operation date (C0D). Since it appears to be a case of IPPs hoodwinking NEPRA at the time of tariff determination; NEPRA to initiate proceedings against such IPP's within 120 days if they have deliberately mislead the regulator.

v. The method employed by NEPRA to determine tariff is archaic and remnant of the 1994 Power policy, when there was no independent Regulator to look after the interest of consumer. The capacity of the NEPRA professional staff needs to be improved to adopt the best practices en vogue by Independent Regulators around the Globe. NEPRA's professional capability appears to be far below the level of an enviable regulatory standard. Mediocre delivery reflects poorly on the Regulatory authority. Immediate steps need to be taken for hiring of professionals and capacity building of existing staff. Road Map of the same to be provided to cabinet division within 45 days.

vi. The qualification and appropriate experience of the provincial members in NEPRA need to be brought up to the required standard of an efficacious Regulatory authority. The professionalism of NEPRA can be gauged from the fact that this high RoE (profits) is visible in the balance sheet posted on NEPRA website but none in NEPRA, bothered to question these IPPs on the high RoE (last 6-8 years) and take remedial measures for timely rectification. Heat rate can easily be calculated from their return submitted to SECP and FBR. The Committee recommended that the selection process will be reviewed in the proposed amendments in NEPRA Act.

vii. Some of the gas based IPP's have claimed in their tariff Gas Infrastructure Development Cess (GIDC) which has been paid to them by CPPAG. These IPP's have collected GIDC in billions of rupees from the consumer through (CPPAG) but have not deposited with the exchequer. NEPRA to provide list of gas based IPPs to SNGPL and SSGPL with 15 days of this order. SNGPL and SSGPL in turn to provide the GIDC dues of the IPPs to CPPAG within 30 days of the provision of list. CPPAG to withhold the said amount from the IPPs till the conclusion of litigation case of GIDC in different courts. Amount withheld to be paid or not paid to IPPs in light of the decision of the apex courts.

viii. NEPRA should follow Competitive/reverse bidding process in granting tariffs in future to the IPPs and abandon the cost plus policy at once.

(Kamal Ahmad Feroz)
Secretary Committee

(Senator Nauman Wazir Khattak)
Convener
Sub-Committee of Senate Standing
Committee on Power

Annexure 1/6 (Summary of Financial Analysis, FY 2011 to 2018)

SUMMARY OF FINANCIAL ANALYSIS
FY 2011 TO 2018

Description	Atlas Power	Nishat Chunian	Nishat Power	Liberty Power	Attock Gen
Profit from regulated business	12,187	14,807	13,952	17,052	16,431
Allowed ROE, ROEDC & WHT	8,394	6,989	6,837	7,805	5,386
Difference*	3,793	7,819	7,116	9,247	11,045

*The difference is attributed partly to savings in fuel due to determined average life cycle efficiency of 45% over the life of 25 years. In the initial years these plants were expected to be more efficient and earn efficiency gains but in the later years these are expected to be less efficient than 45% and will offset the gains made in the initial years.

*The remaining differfence is attributed to the savings in the variable and fixed O&M cost. Variable O&M mainly include spare parts which have also been determined on the basis of average lifecycle. Maintenance cycle and age of the plant are required to be kept in view while analysing the savings in the O&M cost.

Annexure 2/6

ATLAS POWER LIMITED
SUMMARY OF FINANCIAL ANALYSIS

Tariff Components	FY 2010-11	FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	Remarks
	Rupees in Millions								
Accounting Profit	1,367	1,443	1,836	2,183	2,290	3,144	3,308	3,180	As per Financial Statements
Add depreciation	803	791	791	794	793	791	792	793	As per Financial Statements
Less:									
Repayment of Debt	(687)	(814)	(942)	(1,097)	(1,276)	(1,489)	(1,727)	(2,008)	As allowed in the tariff
Late Payment Charges- EPP	(442)	(857)	(490)	(313)	(367)	(294)	(736)	(714)	Additional Income
Late Payment Charges-CPP	(121)	(298)	(275)	(236)	(253)	(267)	(354)	(336)	Additional Income
Other Income	(5)	(3)	(5)	(13)	(1)	-	(1)	0	Additional Income
Sub-Total	**909**	**262**	**919**	**1,319**	**1,186**	**1,884**	**1,281**	**914**	
Add/(Less) other items:									
Difference in Insurance Cost	10	28	1	2	1	4	(0)	1	As per Actual
Difference in Financing Cost	429	806	482	299	398	104	394	559	Additional Expense
Miscellaneous Difference	(9)	30	(12)	14	(38)	(1)	1	(2)	Unreconciled Difference
Profit from Regulated Business	**1,346**	**1,122**	**1,390**	**1,633**	**1,547**	**1,991**	**1,676**	**1,472**	
Allowed ROE, ROEDC	909	941	1,019	1,080	1,071	1,105	1,111	1,157	Regulated Subject to Rs/$ Rate
Equity	4,740	4,740	4,740	4,740	4,740	4,740	4,740	4,740	As per Financial Statements

Annexure 3/6

NISHAT CHUNIAN POWER LIMITED
SUMMARY OF FINANCIAL ANALYSIS

Tariff Components	FY 2010-11	FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	Remarks
	Rupees in Millions								
Accounting Profit	1,613	2,005	2,727	2,901	3,090	2,756	3,000	2,406	As per Financial Statements
Add depreciation	1,255	955	1,103	1,161	1,142	1,171	1,153	1,066	As per Financial Statements
Less:									
Principal Repayment	(664)	(818)	(948)	(1,102)	(1,280)	(1,491)	(1,728)	(2,008)	As allowed in the tariff
Late Payment Charges- EPP	(448)	(834)	(606)	(224)	(330)	(304)	(281)	(403)	Additional Income
Late Payment Charges-CPP	(85)	(231)	(251)	(227)	(339)	(40)	(102)	(173)	Additional Income
Other Income	(45)	(34)	(156)	(86)	(29)	(28)	(36)	(36)	Additional Income
Sub-Total	**1,626**	**1,043**	**1,779**	**2,423**	**2,254**	**2,064**	**2,006**	**1,853**	
Add/(Less) other items:									
Difference in Insurance Cost	(15)	(23)	22	1	2	4	4	4	As per Actual
Difference in Financing cost	348	527	384	100	234	81	167	274	Additional Expense
Miscellaneous Difference	30	2	55	18	30	(79)	(35)	(59)	Unreconciled Difference
Capitalized Spares	-	-	(40)	(479)	(280)	(385)	(556)	(464)	As per Financial Statements
Profit from Regulated Business	**1,989**	**1,549**	**2,200**	**1,673**	**2,241**	**1,685**	**1,586**	**1,608**	
Allowed ROE, ROEDC	687	771	870	944	860	933	999	965	Regulated Subject to Rs./$ Rate
Equity	3,673	3,673	3,673	3,673	3,673	3,673	3,673	3,673	As per Financial Statements

Limitation:

As per Note 4.3.2 and 4.2.1 of the Notes to Financial Statements, major spare parts having economic life more than one year are being capitalized. The exact cost of the capitalized spares has not been disclosed in the financial statements. As verbally informed by NCPL, additions to plant and machinery are capitalized spares and the same has been accounted for in calculation of excess profit. The information regarding capitalized spares in FY 2010-11 can not be extracted as the entire plant and machinery was capitalized in FY 2010-11 and there is no bifurcation available for capitalized spares.

Annexure 4/6

NISHAT POWER LIMITED
SUMMARY OF FINANCIAL ANALYSIS

Tariff Components	FY 2010-11	FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	Remarks
	Rupees in Millions								
Accounting Profit	1,879	2,037	2,759	2,917	3,117	2,851	2,886	3,211	As per Financial Statements
Add depreciation	1,206	971	1,066	1,071	1,014	1,006	984	976	As per Financial Statements
Less:									
Principal Repayment	(642)	(749)	(880)	(1,009)	(1,173)	(1,261)	(1,585)	(1,843)	As allowed in the tariff
Late Payment Charges- EPP	(471)	(725)	(621)	(370)	(443)	(327)	(280)	(506)	Additional Income
Late Payment Charges-CPP	(128)	(267)	(352)	(300)	(218)	(89)	(139)	(194)	Additional Income
Other Income	(38)	(67)	(49)	(30)	(34)	(34)	(25)	(51)	Additional Income
Sub-Total	**1,806**	**1,201**	**1,923**	**2,279**	**2,263**	**2,048**	**1,841**	**1,593**	
Add/(Less) other items:									
Difference in Insurance Cost	(64)	12	47	(0)	3	(1)	7	6	As per Actual
Difference in Financing cost	563	495	334	(95)	(118)	(200)	(123)	5	Additional Expense/(Income)
Miscellaneous Difference	(94)	30	(16)	21	(15)	(58)	80	(21)	Unreconciled Difference
Capitalized Spares	-	(34)	(131)	(490)	(7)	(192)	(715)	(118)	As per Financial Statements
Profit from Regulated Business	**2,211**	**1,704**	**2,130**	**1,689**	**2,127**	**1,597**	**1,090**	**1,467**	
Allowed ROE, ROEDC	691	758	840	913	914	890	913	917	Regulated Subject to Rs./$ Rate
Equity	3,541	3,541	3,541	3,541	3,541	3,541	3,541	3,541	As per Financial Statements

Limitation:

As per Note 4.2.3 of the Notes to Financial Statements, major spare parts qualify as property, plant and equipment when an entity expects to use them for more than one year and transfers are made to relevant operating fixed assets as and when such assets are available for use. The exact cost of the capitalized spares has not been disclosed in the financial statements. As verbally informed by NPL, additions to plant and machinery are capitalized spares and the same have been accounted for in calculation of excess profit. The information regarding capitalized spares in FY 2010-11 can not be extracted as the entire plant and machinery was capitalized in FY 2010-11 and there is no bifurcation available for capitalized spares.

Annexure 5/6

LIBERTY POWER TECH
SUMMARY OF FINANCIAL ANALYSIS

Tariff Components	FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	Remarks
	Rupees in Millions							
Accounting Profit	2,157	2,963	3,204	3,680	3,490	3,834	3,543	As per Financial Statements
Add depreciation	1,501	1,438	1,516	1,373	1,280	1,277	1,133	As per Financial Statements
Less:								
Principal Repayment	(708)	(855)	(975)	(1,145)	(1,350)	(1,582)	(1,859)	As allowed in the tariff
Late Payment Charges- EPP	-	-	-	-	-	-	-	
Late Payment Charges-CPP	(1,181)	(963)	(587)	(717)	(452)	(457)	(751)	Additional Income
Other Income	(12)	(15)	(8)	(92)	(127)	(500)	(7)	Additional Income
Sub-Total	**1,757**	**2,566**	**3,150**	**3,099**	**2,842**	**2,572**	**2,056**	
Add/(Less) other items:								
Difference in Insurance Cost	(9)	(2)	(0)	(10)	(3)	7	8	As per Actual
Difference in Financing cost	653	413	159	106	(67)	(24)	363	Additional Expense
Miscellaneous Difference	(26)	(27)	(88)	22	(4)	(52)	(49)	Unreconciled Difference
Capitalized spares	(151)	(330)	(418)	(42)	(455)	(370)	(805)	As per Financial Statements
Profit from Regulated Business	**2,224**	**2,628**	**2,803**	**3,176**	**2,313**	**2,133**	**1,586**	
Allowed ROE, ROEDC	927	1,003	1,138	1,252	1,177	1,094	1,215	Regulated Subject to Rs/$ Rate
Equity	5,046	5,046	5,046	5,046	5,046	5,046	5,046	As per Financial Statements

Limitation:

As per Note 3.1.1 of the Notes to Financial Statements, major renewals and improvements are capitalized. As per Note 4.1.2 of the Notes to Financial Statements, capitalized spares are depreciated on the basis of number of hours utilized. The exact cost of the capitalized spares has not been disclosed in the financial statements. As verbally informed by LPTL, additions to plant and machinery are capitalized spares and the same have been accounted for in calculation of excess profit.

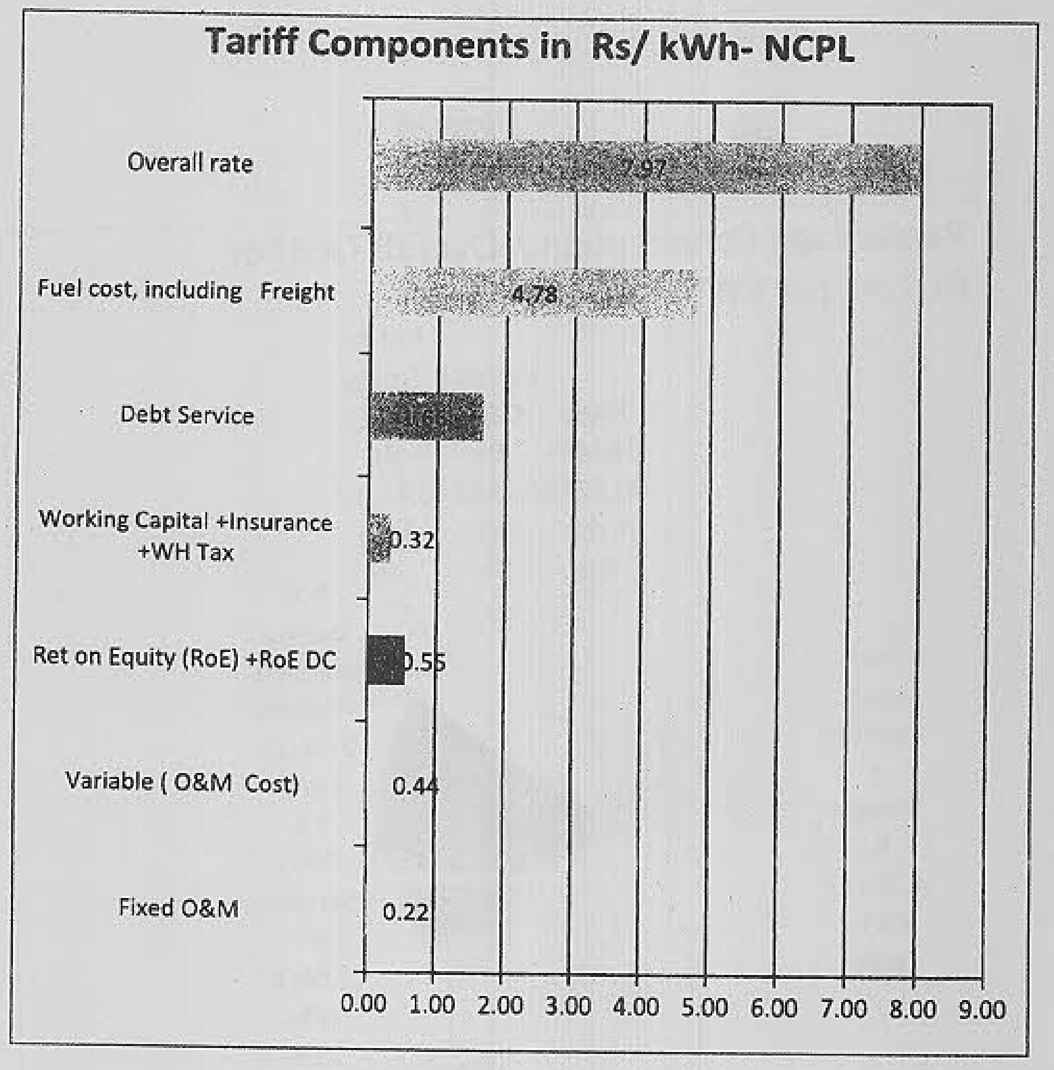
As informed by LPTL, late payment charges pertaining to EPP are also booked in CPP Revenue.

Annexure 6/6

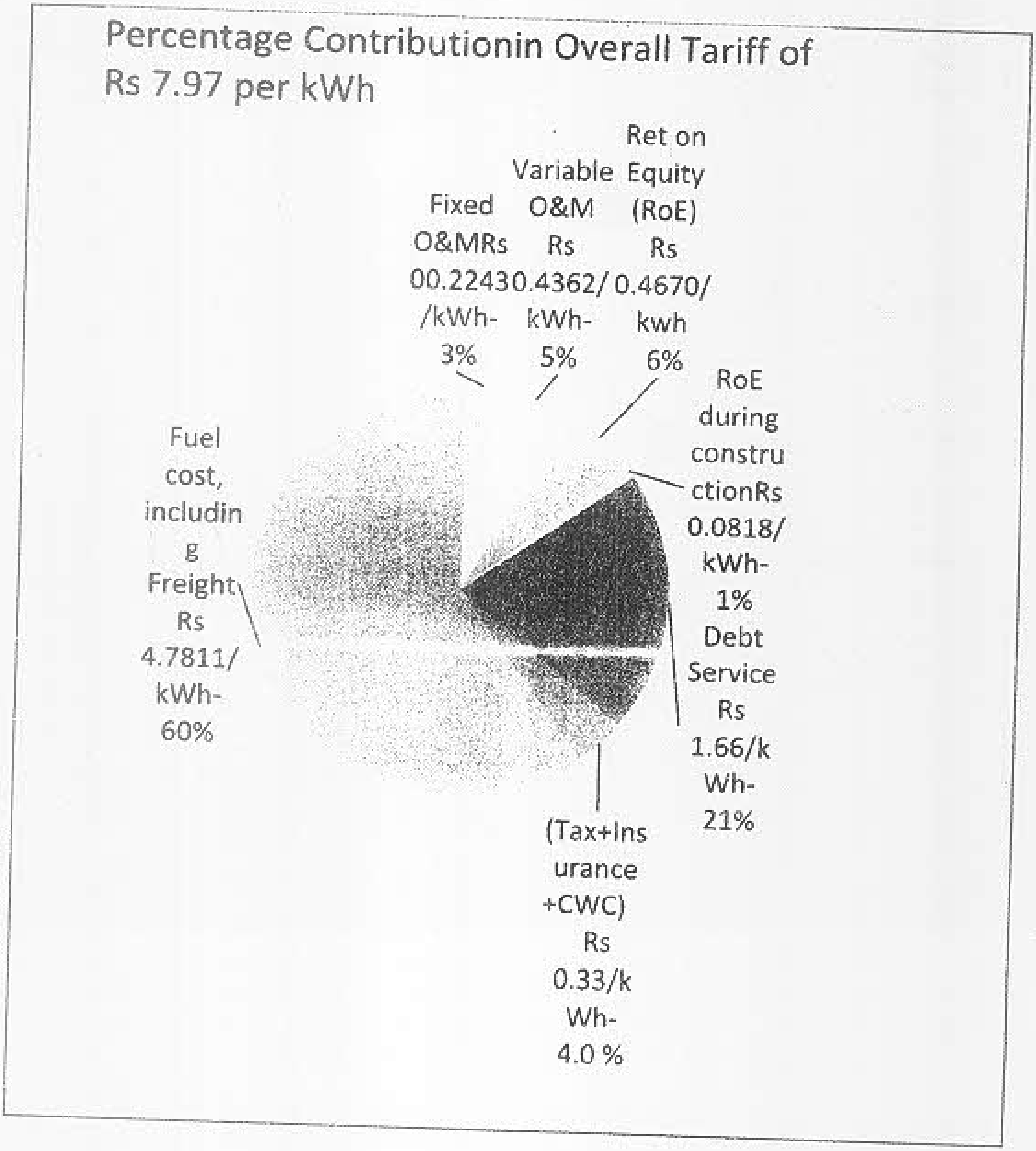
ATTOCK GEN LIMITED
SUMMARY OF FINANCIAL ANALYSIS

Tariff Components	FY 2010-11	FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	Remarks
	Rupees in Millions								
Accounting Profit	2,819	3,097	3,709	3,725	2,857	2,433	2,508	2,551	As per Financial Statements
Add depreciation	483	467	486	481	482	478	476	481	As per Financial Statements
Less:									
Principal Repayment	(571)	(662)	(764)	(884)	(1,023)	(1,187)	(1,370)	(1,585)	As allowed in tariff
Late Payment Charges- EPP	(130)	(90)	8	(183)	(79)	(20)	113	172	Additional Income
Late Payment Charges-CPP	(162)	(206)	(465)	(179)	(198)	(85)	(121)	(189)	Additional Income
Other Income	(120)	(139)	(112)	(112)	(104)	(90)	(78)	(137)	Additional Income
Sub-Total	**2,319**	**2,405**	**2,863**	**2,848**	**1,935**	**1,529**	**1,528**	**1,698**	
Add/(Less) other items:									
Difference in Insurance Cost	2	9	3	(3)	4	(1)	1	1	As per Actual
Difference in Financing cost	(49)	(49)	(46)	(57)	(63)	(70)	(73)	(72)	Additional Income
Miscellaneous Difference	(69)	(20)	(30)	(25)	(25)	(28)	(31)	(37)	Unreconciled Difference
Profit from Regulated Business	**2,203**	**2,405**	**2,787**	**2,765**	**1,851**	**1,430**	**1,425**	**1,505**	
Allowed ROE, ROEDC	584	604	654	693	687	709	713	742	Regulated Subject to Rs/$ Rate
Equity	2,494	2,494	2,494	2,494	2,494	2,494	2,494	2,494	As per Financial Statements

Annexure 2 (Tariff Components in Rs/ kWh, NCPL 2007)



Annexure 3 (Tariff Components in Rs/ kWh, percentage of overall tariff). (NCPL determination 2007)


Percentage Contributionin Overall Tariff of Rs 7.97 per kWh
Fixed O&MRs 00.2243 /kWh- 3%
Variable O&M Rs 0.4362/ kWh- 5%
Ret on Equity (RoE) Rs 0.4670/ kwh 6%
RoE during constructionRs 0.0818/ kWh- 1%
Debt Service Rs 1.66/kWh- 21%
(Tax+Insurance +CWC) Rs 0.33/kWh- 4.0 %
Fuel cost, including Freight Rs 4.7811/ kWh- 60%

Jkn