



Chairman NEPRA,

First of all let us congratulate NEPRA leadership and team on yet another milestone of issuing draft **“NATIONAL ELECTRIC POWER REGULATORY AUTHORITY LICENSING (MICROGRID) REGULATIONS, 2021.”**

This will help advance and develop the Electricity Supply Network in Pakistan for the benefit of the general public and the economy by enhancing prosperity. On this very important juncture of the Electric Power Industry development, we feel it is very important to consider the following points before finalizing the subject regulations:

1. Clause 2 (f) (i)
 - a. The limit of 5MW should be eliminated and a Microgrid should have no Demand or Generation Limit as we are already talking about an area which is underserved by the DISCO. This will cover MGs for industrial Development also.
 - b. In any event if it is deemed necessary to fix such a limit it should be fixed at average of 5MW and not maximum as a Renewable Solar PV microgrid of 5MW means only 800kW or so average.
2. Clause 2 (g)
 - a. Unserved Market definition should include the areas where the DISCO is not providing the Distribution infrastructure at its own cost.
 - b. And where such network is not already approved for the investment in the prevailing financial year by the DISCO board.
3. Clause 3. (3)
 - a. The Limit of 5MW should be eliminated as already we have described conditions where Microgrids can be formed therefore the limit of 5MW is not required.
 - b. In any event if a limit has to be set it should be set at 5MW average power generation or load and not maximum as already explained above.
4. Clause 4. Sub-note 3
 - a. The IEEE standards 1547 and 2030.7 (abstracts are enclosed) and they mainly refer to Point of Common Coupling requirements for a Microgrid. So they presume that the Microgrid shall be connected to the National Grid. In case such connection is not made these standards are not relevant.
 - b. It is suggested that the Microgrids shall be allowed to be connected to the National Grid on mutually acceptable terms between the host DISCO and the MG operator as well as at the cost of the MG operator.
5. Clause 6.
 - a. Tariff should be determined by NEPRA in absence of an Agreement for whatever reason.

- b. In presence of an agreement between the consumers and the MG operator/licensee, such agreement should be with the affirmative consent of NEPRA.

It is hoped that the above points are given due consideration to enable the country to proper and to eventually help is getting rid of the menacing circular debt and moving towards the goals of a open power/energy market.

We also request that if any clarification or explanation is required on the above points, we are willing to present to the NEPRA authorities on their convenience.

Encl: IEEE 1547 and 2030.7 abstracts

Best regards,

Engr. Masroor A Khan
Chairman ETRC Board
Energy Training and Research Center
www.etc.org.pk

Engr. Faiz Bhutta
Chief Executive Officer
Energy Training and Research Center
www.etc.org.pk
info@etc.org.pk
Cell: 0335-4047974

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