MARYAH PRINTERS

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Date: 17 July 2026	**Our Ref.:** PESCO-MP-2026-01
Procurement Ref.: P55727	**Bid Deadline:** 29 July 2026, 10:00 a.m.

To:
The Convener / Chairperson,
Grievance Redressal Committee
Peshawar Electric Supply Company Limited (PESCO)
Material Management Directorate, PESCO Headquarters, Peshawar

Through: Assistant Procurement, Material Management (PESCO)

SUBJECT: PRE-BID GRIEVANCE UNDER RULES 4, 32 AND 48 OF THE PUBLIC PROCUREMENT RULES, 2004 - OBJECTION TO MANDATORY SECTOR REGISTRATION, SINGLE-LOT BIDDING STRUCTURE AND 500-SHEET SAMPLE REQUIREMENT WITHOUT OFFICIAL ARTWORK REGARD TO TENDER STANDARD BIDDING DOCUMENT TITLED “PROCUREMENT OF COMPUTER STATIONERY ITEMS FOR MIS PESCO” (P55727), DATED 14 JULY 2026.

Respected Sir,

M/s Maryah Printers, Islamabad, being a prospective bidder and an established printing firm, respectfully submits this pre-bid grievance against:

(i) **The mandatory eligibility condition requiring sector-specific registration with ‘DISCOs/NTDC/GENCOs/WAPDA/PPMC’**; and

(ii) **The single-lot bidding structure: ITB Clause 15.2 requires all items to be separately listed and priced, while all four items are grouped under one lot titled “Computer Stationery Items for MIS PESCO” with a single bid security of PKR 6,780,000. This indicates that bidders are expected to quote all four items, although the SBD does not clearly state whether partial or item-wise bids are allowed**; and

(iii) **The requirement to submit 500-sheet physical samples for each item without providing the official artwork/specimens to all prospective bidders through EPADS.**

The grievance is filed before the bid-submission deadline so that these issues may be corrected through a corrigendum and genuine open competition may be preserved.

1. Registration condition

> **Eligibility condition**
> The Eligibility Criteria requires: “Registration with the DISCOs/NTDC/GENCOs/WAPDA/PPMC.”

1.1 Previous registration request and PESCO's response

Maryah Printers raised this issue in the previous procurement cycle. Through Letter No. PESCO-MP-2025-03 dated 18 June 2025, we requested PESCO to prequalify/register the firm. By Reply Letter No. 8691 dated 02 July 2025, PESCO advised that our office falls within IESCO's jurisdiction and directed us to apply to the concerned DISCO, whose prequalification would apply to all DISCOs.

PESCO therefore did not process our registration request. A copy of its response is enclosed as Annexure-II. Reintroducing the same condition now excludes an otherwise qualified bidder after PESCO itself redirected the registration request elsewhere.

1.2 Objection and request

Objection: Registration with DISCOs/NTDC/GENCOs/WAPDA/PPMC is not a statutory licence for printing work. A printer's capability can be assessed through lawful business and tax registration, relevant printing experience, financial and production capacity, non-blacklisting and sample conformity. The condition is particularly unfair to Maryah Printers because PESCO did not process our request made through Letter No. PESCO-MP-2025-03 dated 18 June 2025 and redirected us through PESCO Reply Letter No. 8691 dated 02 July 2025.

Request: Delete the mandatory sector-registration condition or expressly allow non-registered firms to participate if they meet all other technical, financial and experience requirements.

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2. Single-lot / complete-lot indication

Single-lot / complete-lot indication

ITB Clause 15.2 states: “All items in the Schedule of Requirement must be listed and priced separately in the Price Schedule(s).” The Items/Lots section places all four items under one lot titled “Computer Stationery Items for MIS PESCO” and specifies one bid security of PKR 6,780,000 for that lot. Read together, these provisions indicate that bidders are expected to quote all four items; however, the SBD does not expressly state whether partial or item-wise bids are allowed.

2.1 Objection and request

Objection: ITB Clause 15.2 requires all items to be listed and priced separately, while the Items/Lots section groups all four items under one lot and applies one bid security of PKR 6,780,000. This indicates that bidders are expected to quote all four items. At the same time, the SBD does not clearly say whether item-wise bids are allowed. This ambiguity may lead to different interpretations and may prevent capable firms from bidding for individual items according to their capacity.

Request: Issue a corrigendum clearly allowing item-wise bids, or divide the procurement into separate lots so that bidders may quote one or more items and each item may be evaluated and awarded separately.

3. Sample condition

Sample condition

The SBD requires “Samples (500 Sheets of each item)” before bid opening. Technical evaluation gives 100 marks for sample approval by MIS, PESCO, with 100 marks required to pass. However, the SBD does not include the bill/DCN artwork or identify an equal and documented method through which every bidder may obtain the official specimens.

3.1 Objection and request

Objection: Requiring 500-sheet samples for each item without providing the official artwork makes accurate compliance difficult. Bidders cannot know the approved text, colour values, logos, dimensions, margins, perforations, fonts, fixed and variable fields, numbering or front/back layouts. Firms already holding previous PESCO designs may therefore receive an unfair advantage.

Request: Upload the complete, approved and print-ready artwork for every tender item in soft-file format through EPADS, and allow reasonable time for all bidders to prepare compliant samples after the artwork is issued.

4. Legal grounds:

1. **Rule 32 - discriminatory and difficult conditions:** Rule 32 states: “Save as otherwise provided, no procuring agency shall introduce any condition, which discriminates between bidders or that is considered to be met with difficulty. In ascertaining the discriminatory or difficult nature of any condition reference shall be made to the ordinary practices of that trade, manufacturing, construction business or service to which that particular procurement is related.” For commercial printing, the ordinary legal and trade credentials are business incorporation/registration, FBR/ATL and sales-tax status, relevant printing experience, financial and production capacity, and conformity of samples - not prior enlistment with DISCOs/NTDC/GENCOs/WAPDA/PPMC as a statutory licence to print.
2. **Rule 4 - fairness, transparency and value for money:** Restricting participation through sector registration, unclear single-lot bidding and unequal access to the controlling artwork narrows competition and is inconsistent with fair, transparent, efficient and economical procurement and the objective of obtaining value for money.
3. **Rule 48 - pre-bid grievance jurisdiction:** Rule 48 permits a written complaint against eligibility parameters, evaluation criteria or other bidding-document terms that are contrary to the procurement regulatory framework. The GRC is therefore requested to decide this complaint before the bid deadline.

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5. Comparison for other departments:

Annexure-I shows that LESCO, FESCO, MEPCO, IESCO and QESCO do not make registration with DISCOs/NTDC/GENCOs/WAPDA/PPMC a mandatory eligibility condition. For artwork, IESCO and QESCO include formats/designs; LESCO provides an official route to obtain its specimen; FESCO refers to an approved sample; and MEPCO's service procurement does not impose a physical sample requirement. Among the compared procurements, PESCO combines mandatory sector registration and a substantial sample burden with no disclosed artwork/access mechanism.

6. Relief requested:

1. **Remove or relax the registration condition:** Delete “Registration with the DISCOs/NTDC/GENCOs/WAPDA/PPMC” from the mandatory eligibility criteria, or expressly permit non-registered firms to participate if they meet all other qualification requirements.
2. **Allow item-wise bidding:** Clarify through a corrigendum that partial/item-wise bids are allowed, or divide the procurement into separate lots so that bidders may quote one or more items and each item may be evaluated and awarded separately.
3. **Provide complete official artwork/specimens:** Upload through EPADS, in print-ready soft-file format, the approved artwork for General Bill Form, General DCN, MDI Bill Form, MDI DCN and every other pre-printed item for which a sample is required. The package should include front/back layouts, exact dimensions, margins, perforations, colour references, logos, fixed and variable fields, fonts, numbering and security features.
4. **Issue a corrigendum and allow preparation time:** Publish the corrected eligibility criteria, clarified item/lot arrangement and complete artwork through EPADS, and allow reasonable time for bidders to prepare their bids and samples.
5. **Pass a reasoned decision before the deadline:** Please issue the GRC's written and reasoned decision before the bid-submission deadline. If any disputed condition is retained, please explain its legal basis, the reasons for keeping it, and how a new qualified printer can meet it within a reasonable time.

We submit this grievance in good faith and in the public interest, so that the procurement may attract the widest pool of technically capable printers and achieve genuine competition, transparency and value for money.

Maryah Printers remains ready to submit fully compliant samples immediately after the official artwork/specimens are issued on equal terms to all bidders through EPADS.

Yours faithfully,

MARYAH PRINTERS
Plot No. 122 Humak Industrial Area Islamabad

Muhammad Shahid Javaid Cheema
Director – Sales & Marketing
Maryah printers, Islamabad

Enclosures

1. Annexure-I: Comparative review of electricity-bill printing procurements.
2. Annexure-II: PESCO Reply Letter No. 8691 dated 02 July 2025, issued in response to Maryah Printers Letter No. PESCO-MP-2025-03 dated 18 June 2025.

ANNEXURE-I

COMPARATIVE REVIEW OF ELECTRICITY-BILL PRINTING PROCUREMENTS

Purpose: to compare sector-registration requirements and the treatment of sample artwork/specimens in the cited SBDs.

Entity / procurement	SBD / bid timing	Sector registration requirement	Sample and artwork treatment
PESCO P55727 Procurement of Computer Stationery Items for MIS PESCO	SBD: 14 Jul 2026 Close: 29 Jul 2026, 10:00 a.m.	MANDATORY: “Registration with the DISCOs/NTDC/GENCOs/WAPDA/PPMC.”	All four items are placed under one lot with a single bid security of PKR 6,780,000. 500 sheets of each item are required; sample approval carries all 100 technical marks. No bill/DCN artwork or equal retrieval method is included.
LESCO Tender 4329/2026 Electricity Bill Forms & Disconnection Notices	Close: 16 Mar 2026, 10:30 a.m.	No mandatory sector enlistment. Requires FBR/ATL, printing operations and two years' supply experience of pre-printed bill forms to any DISCO.	500 pre-printed papers of each item. The SBD expressly says the specimen is to be obtained from the Chief (IT) Officer, LESCO.
FESCO T/3111 Utility Bills Form (MDI) A4 & Plain Paper A4	SBD: 29 Jun 2026 Close: 16 Jul 2026, 11:00 a.m.	No mandatory sector enlistment. Eligibility calls for FBR-related registration, non-blacklisting and other bid-specific declarations.	The samples artwork is provided
MEPCO P52439 / 49/27 Electricity Bill Printing Solution (service procurement)	Published: 30 Jun 2026 Close: 21 Jul 2026, 11:00 a.m.	No mandatory power-sector enlistment. Requires Pakistan business registration, NTN, PRA/sales-tax registration and relevant variable-data printing experience.	No physical sample condition appears in the official SBD portal. Annex-A is listed with the procurement documents.
IESCO P55544 Procurement of Computer Stationery	SBD: 08 Jul 2026 Close: 30 Jul 2026, 10:30 a.m.	No mandatory sector enlistment. Requires non-blacklisting declaration and technical/financial qualification evidence.	The samples artwork is provided
QESCO P59546 / T-2044 Bill Forms (General & MDI), 80 GSM	SBD: 15 Jul 2026 Close: 04 Aug 2026, 10:00 a.m.	No mandatory sector enlistment. Requires FBR/GST and relevant bill-form supply/manufacturing experience.	The samples artwork is provided
SEPCO P57770 / Tender 1392/26 Printing Bill Forms (General + MDI)	SBD: 10 Jul 2026 Close: 29 Jul 2026, 10:30 a.m.	Expressly open to prequalified, registered and non-registered firms. Eligibility confirms non-registered firms may participate if they meet qualification/experience criteria.	The samples artwork is provided

Finding: PESCO's mandatory sector-registration requirement is not replicated in the cited comparators. PESCO also places all four items in one lot and combines a 500-sheet sample requirement and pass/fail sample-based evaluation with no disclosed official bill/DCN artwork or equal specimen-access mechanism.

Annexure-II:

PESHAWAR ELECTRIC SUPPLY COMPANY LIMITED
Material Management Directorate
Shami Road, Sakhi Chashma, WAPDA House, Peshawar.
Tel No.091-9211994, Tel No.091-9212041 (Ext-240). Fax No.091-9212956
Email. mm@pesco.com.pk

No 8691 /Registration/Maryah Printers Dated 02 07 /2025

M/s Maryah Printers,
Plot No. 122, Humak Industrial Area,
Islamabad.

Subject: - **PRE-QUALIFICATION / REGISTRATION OF FIRM / COMPANY**

Ref:- Your letter No. PESCO-MP-2025-03 Dated.18.06.2025.

Reference to your letter referred above, it is intimated that your firm / office lies within jurisdiction of IESCO. Therefore, apply for prequalification of your firm at your concerned DISCO which will be applicable to all DISCOs.

Dy. Manager (MM)
PESCO H/Q, Peshawar