



UNIVERSAL METALS (PVT) LTD.

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M/FESCO/EPAD-P65582/001/26 & M/FESCO/EPAD-P65585/001/26 & M/FESCO/EPAD-P65588/001/26

July 28th, 2026

To,
The Director (Material Management)
Faisalabad Electric Supply Company (FESCO),
Faisalabad

Subject: Grievance Regarding Modification of Eligibility Criteria in Tender Nos. T 3124, T 3125 and T 3126 for Procurement of 11 kV Overhead Conductor

Dear Sir,

We respectfully wish to draw your kind attention to FESCO Tender Nos. T-3124, T-3125, and T-3126 for the supply of 11 kV overhead conductor, in which the long-standing eligibility requirement of past supply experience and satisfactory performance in overhead conductor has been modified. We believe this modification merits urgent reconsideration in FESCO's own interest.

Overhead conductor is a highly specialized, performance-critical product that remains in service for 25 to 30 years once installed. Its DC resistance, breaking load, and stranding directly determine the electrical losses and mechanical integrity of every feeder on which it is used. The quality, reliability, and long-term performance of the distribution network therefore depend heavily on the quality of the conductor itself. Any substandard conductor increases losses on every unit of electricity delivered throughout the entire service life of the line, resulting in recurring costs that far exceed any initial saving achieved at the time of award.

The purpose of qualification criteria is to ensure that only technically competent and experienced manufacturers participate in the procurement process. While prequalification or prototype approval establishes that a manufacturer can produce a conforming sample, it does not demonstrate the capability to execute bulk orders involving thousands of kilometres of conductor while consistently meeting the required specifications and delivery schedules. Such capability depends upon sustained raw material procurement, adequate stranding capacity, batch-to-batch consistency, installed production capability, financial strength, and, most importantly, a proven record of successful execution. This is precisely why supply experience and satisfactory performance requirements have traditionally formed an essential part of the qualification criteria.

Similarly, experience or performance certificates relating to other 11 kV distribution materials, which the modified criteria would now accept, cannot be considered a substitute for conductor-specific experience. The manufacture of overhead conductor is an entirely separate process requiring specialized machinery, production techniques, and quality control systems. Experience in manufacturing one distribution product does not establish the capability to manufacture another.

As a result of the modified criteria, FESCO may face several significant operational, technical, and financial risks, including:

- Awarding bulk orders to parties without demonstrated production capacity, leading to delivery defaults and project delays.
- Supply of substandard or inconsistent conductor, resulting in increased technical line losses across the network.
- Premature conductor failures, breakages, and outages, affecting consumers and public safety.
- Frequent interruptions to the distribution network arising from poor-quality or unreliable material.
- Reduced service life of the supplied conductor, resulting in a greater financial burden on the utility.



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- Increased maintenance, replacement, and reconductoring costs throughout the service life of the asset.
- Risk purchase, retendering, and litigation costs in the event of supplier failure.
- Adverse audit and regulatory observations arising from unsuccessful procurements.

Conductor-specific experience requirements are consistent with established procurement practice. Qualification should be assessed against the specific product being procured, while past performance, successful execution history, and manufacturing capability are universally recognized measures of a supplier's ability to perform. These requirements also do not restrict competition, as there is already a healthy number of qualified conductor manufacturers in the industry. At the same time, educational or trial orders continue to provide the established pathway for new entrants to demonstrate their capability and build a proven performance record.

In light of the above, we respectfully request FESCO to review this modification and, through a corrigendum issued before the bid submission date, restore the requirement for past supply experience and satisfactory performance specifically in overhead conductor in Tender Nos. T-3124, T-3125, and T-3126. We further request that future procurements of overhead conductor continue to require proven technical expertise, adequate production capability, and a successful supply record.

Such a revision will promote fair competition among genuinely qualified manufacturers while safeguarding FESCO's operational interests and ensuring the procurement of reliable, high-quality conductor. It will also help preserve FESCO's hard-earned progress in reducing technical losses and maintaining a reliable distribution network. We trust that FESCO will give this matter its due consideration in the interest of transparency, quality, and the long-term reliability of Pakistan's power distribution system.

Regards,

For

Universal Metals (Pvt.) Ltd.

