

MD/SECP/02/2020  
18 May 2020

**Mr. Naveed A. Sethi**  
Deputy Director  
Corporate Supervision Department  
Company Law Division  
Securities and Exchange Commission of Pakistan  
NIC Building, Jinnah Avenue  
Islamabad

Subject: **Application for extension in period of holding Annual General Meeting (AGM) for the FY2017-18 and laying of Accounts therein under Section 132 & 223 read with Section 147 of the Companies Act, 2017**

Dear Sir;

This is with reference to your letter no. EMD/233/415/627 dated 25 March 2020 (**Annexure-A**) wherein the directions of the Commission under Section 147 of the Companies Act, 2017 were communicated to SSGC for holding of AGM for the year ended 30 June 2018 by 31 May 2020. The directives referred were issued consequent upon SSGC's application reference No. DMD-F&A/SECP/04/19 dated 3 March 2020 (**Annexure B**). It is pertinent to mention that peculiar situation of SSGC causing delay in holding of AGM was earlier clarified in detail through letter reference DMD-F&A/SECP/44/19 dated 9 December 2019 (**Annexure C**).

In the above referred communications, complete background of the issue regarding delay in holding of AGM for FY 2017-18 was explained to the Commission. We are taking this opportunity to provide you latest positive update / progress on the matter as under:

- i. The determination of the Final Revenue Requirement for FY 2017-18, which as per the current Tariff Regime will form the basis for finalization of the Financial Statements for the year has been issued by OGRA on 23 April 2020.
- ii. As regards to the matter of ECC Summary on the matter of RLNG Pricing addressing the issue of SSGC claim based on RLNG Volumes Handling,
- iii. The Summary, after consultation with the gas utilities, OGRA, Finance and Power Division was included in Agenda for consideration by ECC in its meeting held on 13 May 2020. However, the same could not be considered due to paucity of time and deferred for consideration in the subsequent ECC meeting.
- iv. In order to expedite the process of finalization of Financial Statements, OGRA decision along with draft financial statements for FY 2017-18 after incorporating impact of the decision have been provided to the External Auditors for completing

the audit process. Since OGRA has issued its determination before finalization of the matter of SSGC claim of RLNG Volumes Handling, thus the OGRA has not provided the benefit/ impact in the determination referred. SSGC is making incessant follow-up to expedite the ECC decision on the Summary, however, if it is delayed then the benefit of RLNG Volume Handling would be incorporated in subsequent financial statements based on OGRA's upcoming determination of SSGC revenue requirements.

In view of the above facts, it is evident that the Financial Statements of FY 2017-18 are under finalization and AGM will be held soon. We appreciate that due consideration has always been made by the Commission on the fact that the timelines are beyond the control of SSGC. Keeping in view of the above developments, we request the Commission to condone the delay and issue further directives under Section 147 of the Companies Act, 2017 for holding of AGM for FY 2017-18 by 31 July 2020.

The above is submitted for the favorable consideration of SECP.

With regards,

Yours sincerely,



**Muhammad Amin Rajput**  
Acting Managing Director

**CC:**

- Registrar of Companies  
Securities and Exchange Commission  
of Pakistan  
State Life Building No. 2,  
Wallace Road,  
Karachi
- President Pakistan Stock Exchange  
Pakistan Stock Exchange Limited  
Stock Exchange Building  
Stock Exchange Road  
Off I. I. Chundrigar Road  
Karachi