



ORDER NO/NERC/211/2020

**BEFORE THE NIGERIAN ELECTRICITY REGULATORY COMMISSION
IN THE MATTER OF THE AMENDMENT OF THE ORDER ON THE CAPPING OF ESTIMATED
BILLS FOR BENIN ELECTRICITY DISTRIBUTION PLC**

Title

1. This regulatory instrument may be cited as the **AMENDED ORDER ON THE CAPPING OF ESTIMATED BILLS FOR BENIN ELECTRICITY DISTRIBUTION PLC.**

Commencement and Amendment

2. This Order amends Order No/NERC/197/2020 (Order on the Capping of Estimated Bills in the Nigerian Electricity Supply Industry) that was issued by the Nigerian Electricity Regulatory Commission ("NERC" or the "Commission") on 20 February 2020. This Amended Order on the Capping of Estimated Bills for Benin Electricity Distribution Plc ("BEDC") shall take effect from 1 November 2020 and shall cease to have effect on the issuance of a new Order on the same subject matter by the Commission.

Context

3. The Commission is mandated by section 32(1)(a) of the Electric Power Sector Reform Act 2004 ("EPSRA") to *"create, promote, and preserve efficient industry and market structures, and to ensure the optimal utilisation of resources for the provision of electricity services"*.
4. The Commission pursuant to section 96 of EPSRA; which provides that *"the Commission may make regulations prescribing all matters which are by this Act are required or permitted to be prescribed or which, in the opinion of the Commission, are necessary or convenient to be prescribed for carrying out or giving effect to this Act"*; issued the following regulations to address the issue of downstream revenue assurance between distribution licensees ("DisCos") and their customers –
 - a. the Nigerian Electricity Regulatory Commission's Connection and Disconnection Procedures for Electricity Services 2007.
 - b. the Nigerian Electricity Regulatory Commission's Meter Reading, Billing, Cash Collection and Credit Management for Electricity Supplies Regulations 2007.

- c. the Methodology for Estimated Billing Regulations 2012.
5. DisCos are required to meter customers in accordance with requisite standards of performance. The legacy situation at acquisition of majority stake in the distribution assets from government was that the majority of customers were unmetered and there has been little change in the situation as the deployment of meters by DisCos has been outpaced by the growth in customer numbers in NESI. Data received from the ongoing customer enumeration exercise indicates that the customer population has grown from 5million in 2012 to over 10million as at December 2019 with about 52% of the population being invoiced on the basis of estimated billing.
 6. The need for the introduction of a standard methodology of estimated billing in NESI became inevitable during the transitional period required to close the metering gap and the Methodology for Estimated Billing Regulations was introduced as a means of ensuring that customers were not issued arbitrary bills that were unrelated to actual consumption or any other metric for estimating their energy consumption. Section 3 of the Methodology for Estimated Billing Regulations provides that *"the following categories of customers may be issued estimated bills –*
 - a. *Customers with faulty meters: These are existing customers who have been issued meters which are no longer functional.*
 - b. *Customers whose meters cannot be read: These are customers whose meter readings could not be obtained by the DisCo due to inaccessibility occasioned by locked doors, customers not being at home at the time of reading the meter, presence of dogs on the premises, etc.*
 - c. *Existing customers without meters: These are directly connected customers that have not been provided with meters."*
 7. The successful implementation of the Methodology for Estimated Billing Regulations was hindered by the inadequate level of metering of feeders and distribution transformers which form the source data for the effective application of the estimation methodology.
 8. The inadequacy of accurate data required for the estimation of consumption of unmetered consumers produced the most significant customer complaints with non-provision of meters and unrealistic billing of unmetered customers accounting for over 65% of complaints lodged at customer care centers of DisCos, disputes filed at Forum Offices and subsequent appeals to the Commission.
 9. The significant level of customer dissatisfaction arising from unrealistic estimated bills have also adversely impacted on the market revenues as a consequence of customer apathy and declining willingness to settle their invoices in full.

The image shows two handwritten signatures in blue ink. The first signature is a large, stylized cursive mark. The second signature is smaller and includes the letters 'MA' at the end.

10. The most recent initiative of the Commission to fast track the closure of the metering gap was the issuance of the Meter Asset Provider ("MAP") Regulations with a target of metering all customers within 3 years. The MAP Regulation was approved on 8 March 2018 to achieve the following objectives:
 - a. Encourage the development of independent and competitive meter services in NESI.
 - b. Eliminate estimated billing practices in NESI.
 - c. Attract private investment in the provision of metering services in NESI.
 - d. Close the metering gap through accelerated meter roll out in NESI.
 - e. Enhance revenue assurance in NESI.
11. The third-party investors for the provision of meters under the MAP Regulations have been procured by the BEDC, under a competitive framework of the said Regulations, to provide meters to customers based on multiple financing options. However, several constraints including changes in fiscal policy and the limited availability of long-term funding have led to limited success in the meter roll out. The imperative for mitigating the risk of unrealistic and arbitrary billing of unmetered customers however remains a key priority during the transitional period until Commission's target of "meters for all" in the MAP Regulations is achieved in NESI.
12. All customers of BEDC are classified on the basis of consumption/use into the following categories –
 - a. Non-Maximum Demand (Non-MD): These are customers with single or three phase connection at 0.400kV feeder level. This includes all customers previously classified as R2, C1, D1, and A1 (single and three phase).
 - b. Low Voltage Maximum Demand (MD 1): These are grid connected customers with low voltage (LV) Maximum Demand connection and include all customers previously classified as R3, C2, D2, and A2 Street Light.
 - c. Medium/High Voltage Maximum Demand (MD 2): These are grid connected customers with medium voltage (MV)/high voltage (HV) Maximum Demand (11/33kV) connection. These include all customers previously classified as R4, C3, D3, and A3.
 - d. High Voltage Maximum Demand Special (MD3). These are grid connected commercial and industrial customers with average monthly energy consumption of 6.3MWh/h.
 - e. Lifeline Customers (R1): These are grid connected customers with consumption of not more than 50kWh/month.



13. The Commission had issued a directive to all DisCos in June 2016 on the mandatory metering of all maximum demand ("MD") customers in NESI no later than 30 November 2016. The deadline was subsequently extended to 1 March 2017 at the instance of the DisCos and the Commission thereafter issued the following directives –
 - a. *"Any MD customer not provided a meter by 1 March 2017 shall not pay any electricity bill presented by a DisCo on the basis of estimated billing methodology and these customers are advised to report to the Commission.*
 - b. *No DisCo shall disconnect any MD customer that was not metered by 1 March 2017 on the basis of the customer's refusal to pay an invoice issued on the basis of estimated billing after the compliance deadline.*
14. The Commission issued Order No/NERC/183/2019 on the mandatory migration of R3 class of residential customers, industrial and commercial customers to cashless settlement platforms and other matters relating to revenue protection in NESI on 30 December 2019. Paragraph 13 of the Order provides that *"all DisCos shall ensure full accountability of energy flow with the installation of appropriate metering infrastructure that is integrated with the customer management system of all industrial, commercial and R3 class of residential customers by 31 December 2020"*.
15. The Commission issued Order No/NERC/197/2020 (Order on the Capping of Estimated Bills in the Nigerian Electricity Supply Industry) on 20 February 2020.
16. The Order on the Capping of Estimated Bills in the Nigerian Electricity Supply Industry on the Capping of Estimated Bills repealed the Methodology for Estimated Billing of 2012 and also addressed the practice of arbitrary billing of unmetered Non-MD customers while seeking to fast track the deployment of meters through the Meter Asset Provider (MAP) Scheme.
17. The Order on the Capping of Estimated Bills in the Nigerian Electricity Supply Industry on the Capping of Estimated Bills provides that ***"the Commission shall periodically review the meter deployment targets achieved by DisCos and shall on a quarterly basis review the base data on the vending records and supply availability for the purpose of reviewing the energy caps"***.
18. BEDC filed submissions with the Commission for the review of the energy caps of unmetered customers in consideration of –
 - a. The effect of the energy cap methodology on actual consumption of electricity by end-use customers.
 - b. The consequential impact of the Covid-19 pandemic on meter deployment by MAPs.
 - c. The non-commensurate payment for electricity consumed by end-use customers.



Determination of Energy Caps

19. BEDC proposed the following methodologies for the determination of energy caps in their submissions –
 - a. Adoption of weighted averages of metered prepaid and postpaid end-use customers on the basis of actual consumption data of these customers from feeders and distribution transformers.
 - b. Adoption of an incremental factor on energy caps of unmetered end-use customers on the basis of actual consumption data from feeders and distribution transformers from business units in the BEDC's network.
 - c. Adoption of consumption data of metered end-use customers whose meters had been verified in the business units in the BEDC's network.
20. The submissions of BEDC were backed by supporting documentation on the data and signed-off by the Managing Director.
21. The Commission considered the submission of BEDC and approved the methodology in 19(a) above as the basis for the review of energy caps of unmetered customers in NESI.

THE COMMISSION HEREBY ORDERS as follows –

- A. The energy caps of unmetered end-use non-maximum demand ("Non-MD") customers of BEDC shall be computed on the basis of the weighted averages of prepaid and postpaid metered end-use customers on the basis of actual consumption data of these customers from feeders and distribution transformers.
- B. All unmetered Non-MD customers of BEDC shall not be billed for the consumption of energy beyond the cap stipulated in Schedule 1 of this Order.
- C. The energy caps prescribed by the Commission shall only apply to Non-MD customers.
- D. Non-MD customers under tariff bands D and E whose tariffs have been frozen shall have their tariffs computed using corresponding tariff rates of R2 and C1 under previous tariff classification.
- E. Details of the business unit, feeder/distribution transformer name, tariff class and rates shall be disclosed on all bills and receipts issued to customers by BEDC.
- F. Any customer that rejects the installation of a meter on their premises by BEDC shall not be entitled to supply and **MUST BE DISCONNECTED** by BEDC, and shall only be reconnected to the network after the meter has been installed.
- G. BEDC shall notify customers of any outstanding bills on their account and agree a payment plan for the settlement of amount due prior to installing a meter on the customer's premises.
- H. Where a customer's meter becomes faulty and a replacement meter cannot be provided by BEDC within 2 working days, the customer shall be billed an average of the last 3 month's billing/vending in accordance with section 16(5) of the MAP Regulations until the meter is replaced.



- I. The Commission shall periodically review the meter deployment target achieved by BEDC and shall on a quarterly basis review the base data on vending records and supply availability for the purpose of reviewing the energy caps prescribed in this Order.

Amendment

22. The Commission may amend this Order by making supplementary or further Orders to address the subject matter.

Dated this 30th day of October 2020



James A. Momoh
Chairman



Dafe C. Akpeneye
Commissioner
Legal, Licensing & Compliance

Schedule 1
Benin Electricity Distribution Company Plc

Monthly Energy Caps

Business Unit	Feeder	Non-MD Service Band	Cap (kWh)
ADO-EKITI	ADEBAYO	Tariff Band E-11KV	166
	AGRIC/OLOPE	Tariff Band E-11KV	180
	AJILOSUN	Tariff Band E-11KV	206
	BASIRI	Tariff Band E-11KV	204
	GARAGE (IKERE 1)	Tariff Band C-11KV	223
	IGEDE	Tariff Band E-11KV	199
	IKERE 33 Direct	Tariff Band C-33KV	227
	ILAWE/AROMOKO 33 Direct	Tariff Band C-33KV	224
	ISE/EMURE	Tariff Band E-11KV	166
	IWOROKO/IKOLE 33 Direct	Tariff Band B-33KV	284
	ODO-ADO	Tariff Band E-11KV	220
	OKESHA	Tariff Band E-11KV	166
AGBOR	Feeder	Non-MD Service Band	Cap (kWh)
	AGBOR 6 33 Direct	Tariff Band A-33KV	574
	AGBOR IRRUA 33 Direct	Tariff Band E-33KV	364
	AGBOR-OBI	Tariff Band E-11KV	386
	EXPRESS (AGBOR)	Tariff Band E-11KV	177
	IGBANKE	Tariff Band E-11KV	552
	OGWA-EBELE	Tariff Band E-11KV	382
	OWA	Tariff Band E-11KV	173
	OWA-ALERO	Tariff Band E-11KV	328
	TOWN	Tariff Band E-11KV	184
	UMUNEDE	Tariff Band E-11KV	166
AKURE	Feeder	Non-MD Service Band	Cap (kWh)
	AKURE - COMMERCIAL	Tariff Band A-11KV	440
	ALAGBAKA	Tariff Band E-11KV	168
	EXPRESS (AKURE)	Tariff Band E-11KV	166
	IDANRE ROAD	Tariff Band E-11KV	177
	IDANRE TOWN	Tariff Band E-11KV	166
	IGBATORO	Tariff Band E-11KV	278
	IJAPO	Tariff Band D-11KV	247
	IJOKA	Tariff Band E-11KV	166
	IJU 33 Direct	Tariff Band B-33KV	284
	IJU/ITAOGBOLU TOWNSHIP	Tariff Band C-11KV	223
	ISINKAN	Tariff Band E-11KV	166
	OBA-ILE	Tariff Band E-11KV	193
OBA-ILE/REC 33 Direct	Tariff Band A-33KV	380	
ODA	Tariff Band E-11KV	167	

	OKE-EDA	Tariff Band E-11KV	166
	OWENA 33 Direct	Tariff Band A-33KV	416
	OWO 33 Direct	Tariff Band B-33KV	288
	Feeder	Non-MD Service Band	Cap (kWh)
	ANWAI	Tariff Band E-11KV	260
	ASABA ALLUMINIUM	Tariff Band C-11KV	223
	ASABA -COMMERCIAL	Tariff Band A-11KV	429
	CABINET	Tariff Band D-11KV	307
	EXPRESS -ASABA	Tariff Band E-11KV	424
	EZENEI	Tariff Band E-11KV	179
	GOVT. HOUSE	Tariff Band E-11KV	208
	ISELE ASAGBA	Tariff Band E-11KV	669
	ISELE-UKU 33 Direct	Tariff Band C-33KV	223
	ISSELE-UKU	Tariff Band C-11KV	618
ASABA	MARBLE HILL	Tariff Band E-11KV	166
	OGBEKNU-UMUOLO	Tariff Band C-11KV	618
	Okotomi	Tariff Band B-11KV	347
	OKWE	Tariff Band E-11KV	166
	ONICHA-UKU	Tariff Band C-11KV	692
	OSADENNIS	Tariff Band E-11KV	181
	OWA-ALERO	Tariff Band E-11KV	166
	PS -COMMERCIAL	Tariff Band A-11KV	718
	SPC	Tariff Band E-11KV	286
	Specialist	Tariff Band D-11KV	405
	TOWNSHIP	Tariff Band E-11KV	529
	TOWNSHIP 33 Direct	Tariff Band A-33KV	2,296
	Feeder	Non-MD Service Band	Cap (kWh)
	AFOKPELLA	Tariff Band E-11KV	166
	AGBEDE	Tariff Band C-11KV	223
	AGENEBODE 33 Direct	Tariff Band B-33KV	284
	AGENEBODE TOWN	Tariff Band E-11KV	166
	AUCHI IKPESHI 33 Direct	Tariff Band B-33KV	296
	AUCHI TOWN	Tariff Band E-11KV	166
	AVIELE	Tariff Band C-11KV	223
	AWOYEMI	Tariff Band E-11KV	166
	AYOGWIRI	Tariff Band C-11KV	541
	ENWAN	Tariff Band E-11KV	166
	FUGAR TOWN	Tariff Band C-11KV	223
	GRA -AUCHI	Tariff Band E-11KV	166
	IBILLO	Tariff Band C-11KV	285
	IGARA TOWN	Tariff Band E-11KV	196
	IGBE ROAD	Tariff Band E-11KV	166

	IVIOGHE	Tariff Band E-11KV	166
	JAGBE	Tariff Band C-11KV	333
	JATTU	Tariff Band E-11KV	239
	OKPE	Tariff Band C-11KV	223
	OKPELLA TOWN 33 Direct	Tariff Band A-33KV	574
	OSOSO 33 Direct	Tariff Band C-33KV	262
	SOUTH-IBIE	Tariff Band E-11KV	166
	WARRAKE	Tariff Band C-11KV	223
EFFURUN	Feeder	Non-MD Service Band	Cap (kWh)
	AGAGA LAYOUT	Tariff Band E-11KV	176
	AIRPORT ROAD	Tariff Band D-11KV	247
	EKPAN TOWN	Tariff Band E-11KV	170
	ENERHEN 33 DIRECT	Tariff Band B-33KV	284
	HOUSING COMPLEX	Tariff Band E-11KV	216
	JAKPA ROAD	Tariff Band E-11KV	187
	JEDO	Tariff Band C-11KV	571
	Mc DERMOTT	Tariff Band E-11KV	167
	OGUNU ROAD	Tariff Band E-11KV	166
	OUR LADY'S	Tariff Band D-11KV	298
	PTI ROAD	Tariff Band E-11KV	192
	REFINERY I 33 Direct	Tariff Band B-33KV	370
	REFINERY II 33 Direct	Tariff Band C-33KV	258
	SAPELE (EFFURUN) 33 Direct	Tariff Band A-33KV	490
	SAPELE ROAD	Tariff Band E-11KV	210
UBEJI	Tariff Band E-11KV	167	
WARRI 33 Direct	Tariff Band B-33KV	284	
ETETE	Feeder	Non-MD Service Band	Cap (kWh)
	ABIGBORODO	Tariff Band B-11KV	284
	ANDREW-WILSON	Tariff Band E-11KV	166
	ARUOGBA	Tariff Band E-11KV	177
	COUNTRY HOME	Tariff Band E-11KV	192
	DUMEZ	Tariff Band E-11KV	175
	EGBA	Tariff Band E-11KV	269
	EKAE	Tariff Band E-11KV	171
	ETETE 33 Direct	Tariff Band A-33KV	380
	EVBUOGUODUN	Tariff Band E-11KV	199
	EVBUORARIA	Tariff Band E-11KV	166
	EVBUOTUBU/ASORO	Tariff Band E-11KV	166
	KOKO 33 Direct	Tariff Band B-33KV	293
	OBAYANTOR	Tariff Band C-11KV	223
	OGHARA TOWN 33 Direct	Tariff Band B-33KV	419
OLOGBO	Tariff Band C-11KV	223	

	OWA-ALERO	Tariff Band E-11KV	166
	UGBOR	Tariff Band D-11KV	247
	UPPER SAPELE	Tariff Band E-11KV	169
	UPPER SILUKO	Tariff Band E-11KV	166
	UPPER SOKPONBA	Tariff Band E-11KV	166
EVBUOTUBU	Feeder	Non-MD Service Band	Cap (kWh)
	ASORO	Tariff Band C-11KV	225
	EDO-TEX	Tariff Band E-11KV	166
	EGOR	Tariff Band E-11KV	166
	EGUADAIKEN	Tariff Band E-11KV	166
	EKENWAN	Tariff Band E-11KV	166
	EKENWAN BARRACK	Tariff Band C-11KV	223
	EVBUOTUBU 33 Direct	Tariff Band A-33KV	380
	EVBUOTUBU/ASORO	Tariff Band E-11KV	166
	EXPRESS 33 Direct	Tariff Band D-33KV	247
	FEEDER 1	Tariff Band E-11KV	166
	FEEDER 2	Tariff Band E-11KV	166
	FEEDER 3	Tariff Band E-11KV	166
	OLIHA	Tariff Band E-11KV	166
	UPPER OWINA	Tariff Band E-11KV	167
	UPPER SILUKO	Tariff Band E-11KV	194
		UWELU	Tariff Band E-11KV
GRA	Feeder	Non-MD Service Band	Cap (kWh)
	AIRPORT (COMMERCIAL)	Tariff Band A-11KV	710
	DUMEZ	Tariff Band E-11KV	177
	EKENWAN	Tariff Band E-11KV	166
	ETETE - COMMERCIAL	Tariff Band A-11KV	466
	FEEDER 3	Tariff Band E-11KV	166
	GRA	Tariff Band C-11KV	291
	GRA - COMMERCIAL	Tariff Band A-11KV	476
	GRA 33 Direct	Tariff Band A-33KV	383
	IHAMA	Tariff Band C-11KV	239
	OBA-PALACE	Tariff Band E-11KV	251
	OGBA	Tariff Band E-11KV	166
	OKO	Tariff Band E-11KV	197
	RESERVATION	Tariff Band E-11KV	237
	UGBOR	Tariff Band D-11KV	247
IDO-EKITI	Feeder	Non-MD Service Band	Cap (kWh)
	ADEBAYO	Tariff Band E-11KV	190
	AJILOSUN	Tariff Band E-11KV	166
	ASIN	Tariff Band C-11KV	223
	AYEDUN	Tariff Band C-11KV	223

	BASIRI	Tariff Band E-11KV	166
	IJERO TOWN	Tariff Band E-11KV	185
	ILAWE/AROMOKO 33 Direct	Tariff Band C-33KV	223
	OKESHA	Tariff Band E-11KV	166
	OTUN 33 Direct	Tariff Band C-33KV	223
	OYE TOWN	Tariff Band E-11KV	169
IGBARA-OKE	Feeder	Non-MD Service Band	Cap (kWh)
	ELIZADE 33 Direct	Tariff Band A-33KV	380
	EXPRESS (AKURE)	Tariff Band E-11KV	166
	IDANRE ROAD	Tariff Band E-11KV	203
	IGBARA OKE 33 Direct	Tariff Band C-33KV	223
	IJU 33 Direct	Tariff Band B-33KV	284
	ILESIA ROAD	Tariff Band E-11KV	169
	ISINKAN	Tariff Band E-11KV	166
	OBA-ILE	Tariff Band E-11KV	166
	OKE-EDA	Tariff Band E-11KV	166
	ONDO ROAD	Tariff Band E-11KV	166
	OYEMEKUN	Tariff Band E-11KV	166
	IKPOBA HILL	Feeder	Non-MD Service Band
ADUWAWA		Tariff Band E-11KV	166
AMUFI -COMMERCIAL		Tariff Band C-11KV	223
ASABA ROAD		Tariff Band E-11KV	166
BDPA		Tariff Band E-11KV	166
EGBA 33 Direct		Tariff Band B-33KV	317
FEDERAL HOUSING ESTATE		Tariff Band E-11KV	166
IHOVBOR		Tariff Band B-11KV	337
IHOVBOR TOWN 33 Direct		Tariff Band B-33KV	284
IKHUENIRO		Tariff Band E-11KV	170
NEW BENIN		Tariff Band E-11KV	201
NEW-AUCHI		Tariff Band E-11KV	185
UPPER MISSION		Tariff Band E-11KV	216
Uteh 2		Tariff Band E-11KV	177
ISOKO	Feeder	Non-MD Service Band	Cap (kWh)
	EXPRESS (UGHELLI)	Tariff Band E-11KV	264
	IGBIDI	Tariff Band E-11KV	305
	IRRI	Tariff Band C-11KV	316
	ISOKO ROAD	Tariff Band E-11KV	217
	ISOKO/KWALE 33 Direct	Tariff Band C-33KV	366
	KWALE EXPRESS	Tariff Band E-11KV	279
	KWALE TOWN	Tariff Band E-11KV	297
	NDC	Tariff Band E-11KV	221
	OLEH	Tariff Band E-11KV	266



	OLOMORO	Tariff Band E-11KV	306
	OWHELOGBO	Tariff Band E-11KV	323
KOKA	Feeder	Non-MD Service Band	Cap (kWh)
	EXPRESS -ASABA	Tariff Band E-11KV	172
	EZENEI	Tariff Band E-11KV	192
	HEAD BRIDGE 33 Direct	Tariff Band B-33KV	583
	IBUSA BY-PASS	Tariff Band D-11KV	460
	IBUZOR	Tariff Band D-11KV	585
	OKWE	Tariff Band E-11KV	166
	OSADENNIS	Tariff Band E-11KV	166
	SIO	Tariff Band E-11KV	527
	OBIARUKU	Feeder	Non-MD Service Band
ABBI TOWN		Tariff Band E-11KV	2,173
ABRAKA 33 Direct		Tariff Band A-33KV	578
ABRAKA TOWN		Tariff Band E-11KV	193
AGBARHO TOWN		Tariff Band C-11KV	259
AGBARHO/EKU 33 Direct		Tariff Band B-33KV	284
CAMPUS 3		Tariff Band E-11KV	283
EKU TOWN		Tariff Band C-11KV	464
OBIARUKU TOWN		Tariff Band E-11KV	177
OHA		Tariff Band E-11KV	257
OKPARA INLAND		Tariff Band E-11KV	194
OKUREKPO		Tariff Band C-11KV	300
OREROKPE TOWN		Tariff Band E-11KV	202
UMUTU		Tariff Band C-11KV	223
OGHARA	Feeder	Non-MD Service Band	Cap (kWh)
	COMMUNITY ROAD	Tariff Band E-11KV	273
	GOVERNOR	Tariff Band E-11KV	193
	KOKO TOWN	Tariff Band E-11KV	186
	KOROBE	Tariff Band E-11KV	194
	MOSOGAR	Tariff Band E-11KV	168
	MOSOGAR 33 Direct	Tariff Band A-33KV	477
	OGHARA TOWN 33 Direct	Tariff Band B-33KV	487
	OTEFE	Tariff Band E-11KV	185
	SAPELE (SAPELE) 33 Direct	Tariff Band B-33KV	284
OKADA	Feeder	Non-MD Service Band	Cap (kWh)
	EKIADOLOR	Tariff Band E-11KV	186
	EXPRESS 33 Direct	Tariff Band D-33KV	753
	IGUOBAZUWA	Tariff Band C-11KV	299
	IGUOSA	Tariff Band E-11KV	166
	IYOWA	Tariff Band E-11KV	166
	OKADA	Tariff Band E-11KV	515

	OLUKU 33 Direct	Tariff Band B-33KV	346	
	UGBOWO	Tariff Band E-11KV	166	
	USEN	Tariff Band E-11KV	242	
ONDO	Feeder	Non-MD Service Band	Cap (kWh)	
	AJEGUNLE	Tariff Band E-11KV	674	
	COLLEGE ROAD	Tariff Band E-11KV	166	
	ERINJE/IRELE	Tariff Band E-11KV	248	
	ILE-OLUJI	Tariff Band C-11KV	223	
	MARKET ROAD (ONDO)	Tariff Band E-11KV	166	
	ODOJOMU	Tariff Band E-11KV	166	
	OKITIPUPA 33 Direct	Tariff Band C-33KV	241	
	ONDO 33 Direct	Tariff Band B-33KV	284	
	PALACE	Tariff Band E-11KV	166	
	TOWNSHIP - OKITIPUPA	Tariff Band E-11KV	166	
	OWO	Feeder	Non-MD Service Band	Cap (kWh)
		IFON	Tariff Band C-11KV	223
IGBEDE		Tariff Band C-11KV	223	
IKARE 33 Direct		Tariff Band C-33KV	223	
ISUADA		Tariff Band C-11KV	223	
OKA		Tariff Band C-11KV	223	
OSOSO 33 Direct		Tariff Band C-33KV	223	
OWO 33 Direct		Tariff Band B-33KV	302	
OWO TOWN		Tariff Band D-11KV	247	
UGBE		Tariff Band C-11KV	223	
PTI	Feeder	Non-MD Service Band	Cap (kWh)	
	AGAGA LAYOUT	Tariff Band E-11KV	176	
	AGBARHO TOWN	Tariff Band C-11KV	223	
	AGBARHO/EKU 33 Direct	Tariff Band B-33KV	419	
	AIRPORT ROAD	Tariff Band D-11KV	260	
	AMAI TOWN	Tariff Band C-11KV	223	
	ENERHEN 33 DIRECT	Tariff Band B-33KV	284	
	LEVENTIS	Tariff Band E-11KV	188	
	Mc DERMOTT	Tariff Band E-11KV	211	
	OGUNU ROAD	Tariff Band E-11KV	166	
	OUR LADY'S	Tariff Band D-11KV	280	
	PTI ROAD	Tariff Band E-11KV	207	
	REFINERY II 33 Direct	Tariff Band C-33KV	396	
	SAPELE (EFFURUN) 33 Direct	Tariff Band A-33KV	469	
	UDU ROAD	Tariff Band E-11KV	182	
WARRI 33 Direct	Tariff Band B-33KV	329		
SAPELE	Feeder	Non-MD Service Band	Cap (kWh)	
	ADEJE	Tariff Band C-11KV	418	

	ADEJE 33 Direct	Tariff Band B-33KV	575
	AMUKPE LOCAL	Tariff Band E-11KV	183
	AMUKPE TOWN	Tariff Band E-11KV	179
	GANA	Tariff Band E-11KV	192
	OGORODE TOWN	Tariff Band E-11KV	200
	SAPELE (SAPELE) 33 Direct	Tariff Band B-33KV	315
	SAPELE/WARRI ROAD	Tariff Band E-11KV	166
	SHELL ROAD	Tariff Band E-11KV	241
	UGBORIKOKO	Tariff Band E-11KV	167
SOKPONBA	Feeder	Non-MD Service Band	Cap (kWh)
	ADUWAWA	Tariff Band E-11KV	166
	DUMEZ	Tariff Band E-11KV	189
	EGBA	Tariff Band E-11KV	166
	FACTORY ROAD	Tariff Band E-11KV	166
	FEEDER 1	Tariff Band E-11KV	166
	FEEDER 2	Tariff Band E-11KV	166
	FEEDER 3	Tariff Band E-11KV	166
	FEEDER 4	Tariff Band E-11KV	166
	MARIA GORRETI	Tariff Band E-11KV	185
	OBA-PALACE	Tariff Band E-11KV	166
	ST. SAVIOUR	Tariff Band E-11KV	166
	UPPER MISSION	Tariff Band E-11KV	166
	UPPER SOKPONBA	Tariff Band E-11KV	166
UDU	Feeder	Non-MD Service Band	Cap (kWh)
	AGAGA LAYOUT	Tariff Band E-11KV	201
	ALADJA 33 Direct	Tariff Band C-33KV	238
	DSC	Tariff Band C-11KV	569
	EKETE	Tariff Band E-11KV	182
	MD COMMERCIAL	Tariff Band E-11KV	166
	ORHUWHORUN ROAD	Tariff Band E-11KV	166
	REFINERY II 33 Direct	Tariff Band C-33KV	223
UGBOWO	Feeder	Non-MD Service Band	Cap (kWh)
	ADUWAWA	Tariff Band E-11KV	180
	COSTAIN	Tariff Band D-11KV	247
	EDO-TEX	Tariff Band E-11KV	196
	EGOR	Tariff Band E-11KV	166
	EGUADAIKEN	Tariff Band E-11KV	166
	FEEDER 1	Tariff Band E-11KV	166
	FGGC	Tariff Band E-11KV	166
	MBH COMMERCIAL	Tariff Band B-11KV	408
	OKHORO	Tariff Band E-11KV	175
	OLUKU 33 Direct	Tariff Band B-33KV	297

	UGBOWO	Tariff Band E-11KV	166
	UPPER LAWANI	Tariff Band D-11KV	251
	UPPER SILUKO	Tariff Band E-11KV	167
	USELU	Tariff Band E-11KV	166
	Uteh 1	Tariff Band E-11KV	195
	Uteh 2	Tariff Band E-11KV	166
	UWELU	Tariff Band E-11KV	166
UGHELLI	Feeder	Non-MD Service Band	Cap (kWh)
	AFIESERE	Tariff Band C-11KV	260
	AGBARHA	Tariff Band C-11KV	223
	DUMEZ ROAD	Tariff Band E-11KV	233
	ECN	Tariff Band E-11KV	232
	ISOKO ROAD	Tariff Band E-11KV	179
	OKPORIE	Tariff Band E-11KV	333
	OLD ROAD	Tariff Band E-11KV	185
	OTERI	Tariff Band E-11KV	183
	OTOVWODO/PATANI 33 Direct	Tariff Band D-33KV	261
UROMI	Feeder	Non-MD Service Band	Cap (kWh)
	ATANI	Tariff Band C-11KV	714
	EGORO	Tariff Band C-11KV	349
	EHOR 33 Direct	Tariff Band B-33KV	724
	EKPOMA TOWN	Tariff Band E-11KV	167
	EME-ORA	Tariff Band C-11KV	235
	EXPRESS UROMI	Tariff Band E-11KV	280
	IRRUA	Tariff Band E-11KV	166
	IRUEKPEN	Tariff Band E-11KV	171
	OPOJI	Tariff Band E-11KV	166
	OTUO TOWNSHIP	Tariff Band C-11KV	223
	UBIAJA 33 Direct	Tariff Band C-33KV	426
	UBIAJA ROAD	Tariff Band E-11KV	166
	UJAVUN TOWN	Tariff Band C-11KV	223
	UJEMEN -COMMERCIAL	Tariff Band C-11KV	459
	UROMI TOWN	Tariff Band E-11KV	174
	UWANHUMI	Tariff Band E-11KV	166
UZEKPA 33 Direct	Tariff Band C-33KV	230	
WARRI	Feeder	Non-MD Service Band	Cap (kWh)
	AGAGA LAYOUT	Tariff Band E-11KV	166
	AJAMIMOGHA	Tariff Band E-11KV	168
	EBOH -COMMERCIAL	Tariff Band C-11KV	664
	EDJEBE	Tariff Band E-11KV	170
	ESTATE	Tariff Band E-11KV	171
	GRA (WARRI)	Tariff Band E-11KV	168

	HOUSING COMPLEX	Tariff Band E-11KV	181
	MARKET ROAD (WARRI)	Tariff Band E-11KV	166
	Mc DERMOTT	Tariff Band E-11KV	166
	MIX&BAKE -VIO -COMMERCIAL	Tariff Band C-11KV	223
	OGUNU ROAD	Tariff Band E-11KV	166
	RADIO BENDEL	Tariff Band E-11KV	170
	REFINERY II 33 Direct	Tariff Band C-33KV	244
	UGBOROKE	Tariff Band E-11KV	166
	WARRI 33 Direct	Tariff Band B-33KV	583

Handwritten signatures and initials in blue ink, including a large circular scribble, a stylized signature, and the letters 'AAA'.