

25.09.2019

Counsel for the appellant present.

Instant appeal has been preferred by an official of Water & Power Development Authority (WAPDA), as such, the status of appellant as a civil servant is not established for the purpose of jurisdiction of this Tribunal.

Learned counsel when confronted with the proposition states that he does not press the appeal and the appellant will seek his remedy at appropriate forum.

Disposed of as such. File be consigned to record room.

Chairman 

Announced:
25.09.2019

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 983/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/07/2019	<p>The appeal of Mr. Abdul Majeed resubmitted today by Mr. Amanullah Pirzada Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR 29/7/19</p>
2-	20/08/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>25/09/19.</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
	25.09.2019	<p>Counsel for the appellant present.</p> <p>Instant appeal has been preferred by an official of Water & Power Development Authority (WAPDA), as such, the status of appellant as a civil servant is not established, <i>for the purpose of jurisdiction of this Tribunal.</i></p> <p>Learned counsel when confronted with the proposition stated that <i>he does not press the</i> appeal is not pressed and the appellant will seek his remedy at appropriate forum.</p> <p style="text-align: center;">Disposed of as such. File be consigned to record room.</p> <p style="text-align: right;">Chairman</p> <p><u>Announced:</u> 25.09.2019</p>


and connection made
and represented on
back side

The appeal of Mr. Abdul Majeed received today, i.e. on 19/07/2019 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Affidavite is not attached with appeal which may be placed on it.
- 2- Memorandum of the appeal may be got signed by the appellant.

No. 1257 /S.T,

Dt. 23-7- /2019


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Aman ullah Pirzada, Adv.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Appeal No. 983/2019

Abdul Majeed

Vs

DG (HR & Admn) WAPDA House Peshawar

I N D E X

S.No	Description of Documents	Annex	Pages
10.	Petition		1-3
11.	Employment Order	A	4
12.	Seniority List	B	5-7
13.	Tentative Seniority list	C	8
14.	Office Order	D	9
15.	Clarification	E	10-11
16.	Departmental Appeal	F	12
17.	Show Cause Notice	G	13-22
18.	Wakalat Nama		23

Petitioner

Through

A
Aman Ullah Pirzada
Advocate, High Court
Peshawar
Cell#0300-5818228

Dated 17.07.2019

①

BEFORE THE COURT OF HONORABLE SERVICE
TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No 983/2019

1. ABDUL MAJEED S/O UMAR DARAZ R/O BADHBEER PESHAWAR ATTENDANT, MME SECTION, WARSAK POWER STATION PESHAWAR.

VERSUS

PETITIONER

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1016

Dated 19/7/18

1. THE DIRECTOR GENERAL (HR & Admn), WAPDA HOUSE LAHORE.
2. THE GENERAL MANAGER Hydel (Operations) WAPDA HOUSE LAHORE.
3. THE Chief Engineer (Hydel), North, WAPDA Warsak Power Station Peshawar.
4. THE Dy. Director (Admin), (Hydel), North, WAPDA Warsak Power Station Peshawar.
5. THE Resident Engineer WAPDA Warsak Power Station Peshawar.

RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 , FOR
THE PROMOTION OF THE PETITIONER FROM BPS 14
TO PBS 16.

RESPECTFULLY SHEWETH,

The petitioner IS submitting his grievances with great beseech as under:

BRIEF FACTS OF THE CASE:-

1. That the petitioner is appointed as attendant in the department of respondents who performed his duty with full kindness and with great regards and still performing his duties with great zeal's with fair heart.

(Copy of the appointment order is attached as annexure "A")

2. That the petitioner has spent long years of his life in respondents department hence as per the service law the petitioner is eligible for promotion because in his service he has never been promoted by the respondents.
3. That the respondents department has circulated a seniority list vide letter No 10850-56/CE/DDA/WSK-10.1 dated 17-09-2018 wherein the appellant promotion was due in the seniority list. (Copy of the letter No 1085-56/CE/DDA/WSK-10.1 and seniority list is attached as annexure "B")

Re-submitted to-day
and filed.

Registrar
29/7/18

4. That the respondents department has issued a second seniority list vide letter No 11690-96/CE/DDA/WSK-40.11 dated 29-10-2018 wherein the petitioner name was omitted from the seniority list by the authority.

(Copy of the letter No 11690-96/CE/DDA/WSK-40.11 dated 29-10-2018 is attached as annexure "C")

5. That The respondents issued an office order vide letter No 1484-89/CE/DDA/WSK-64 dated 13-03-2019 wherein the post of Attendant has been Re-designated as junior Technician (Mechanical) which has curtailed the prospects of the petitioner to higher grade.

(Copy of the letter No 1484-89/CE/DDA/WSK-64 dated 13-03-2019 is attached as annexure "D")

6. That the impugned Re designation is against the spirit of the authority letter No DD(Rules) 07452/40/iii/372 dated 03-09-2018 whereby a clarification had been issued that the attendants may not be Re-designated as junior Technicians. **(Copy of the letter NO DD(Rules) 07452/40/iii/372 dated 03-09-2018 is attached as annexure "E")**

7. That the petitioner being aggrieved of the impugned seniority list vide letter NO 11690-96/CE/DDA/WSK-40.11 dated 29-10-2018 and a consequent order of Re-designation vide order No 1484-89/CE/DDA/WSK-64 dated 13-03-2019 the petitioner preferred a departmental appeal to the respondent No 2 for the redress of his grievances. **(Copy of the Departmental Appeal is attached as annexure "F")**

8. That when the petitioner filed departmental appeal before the respondent No 3 the respondent No 3 become annoyed of the departmental appeal and issued a showcase Notice for explanation vide letter No 2115-16/CE/DDA/WSK/ACF dated 15-04-2019 which were properly replied by the petitioner and was disposed of with no result. **(Copy of showcase and reply is attached as annexure "G")**

9. That the petitioner being aggrieved from the act of the respondents now approached to this learned court for his relief on the following grounds.

GROUNDS

- A. That the impugned seniority list vide letter NO 11690-96/CE/DDA/WSK-40.11 dated 29-10-2018 and a consequent order of Re-designation vide order No 1484-89/CE/DDA/WSK-64 dated 13-03-2019 is against the law and rules
- B. That the acts and omissions of the respondents are the utter violation of the law of the land, law on the subject and against the established norms of justice.
- C. That the acts of the respondents are the violation of article 14 and 9 of the constitution of the Islamic republic of Pakistan
- D. **That the** second seniority list vide letter No 11690-96/CE/DDA/WSK-40.11 dated 29-10-2018 wherein the petitioner name was omitted from the seniority list by the authority may be declared as illegal and void and has no legal effect on the rights of appellants
- E. That the explanation called from the petitioner is highly illegal, against the established norms of justice and service rules

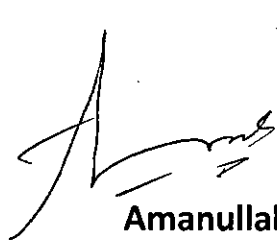
3

- F. That the office order vide letter No 1484-89/CE/DDA/WSK-64 dated 13-03-2019 wherein the post of Attendant has been Re-designated as junior Technician (Mechanical) is against the rules and law and has no retrospective effect.
- G. That the appellant has not been treated in accordance with law and service rules.
- H. That the appellant are bent upon to promote the juniors in the disputed seniority which act is highly discrimination upon the rights of the appellant
- I. That the appellant seeks permission to advance other grounds and proof at the time of hearing

PRAYER:

It is therefore humbly submitted

- A. That the appellant may kindly be promoted as per the seniority list from BPS 14 to BPS 16
- B. That the second seniority list vide letter No 11690-96/CE/DDA/WSK-40.11 dated 29-10-2018 wherein the appellant name was omitted from the seniority list by the authority may be declared as illegal and void and has no legal effect on the rights of appellant and has no retrospective effect.
- C. That the office order vide letter No 1484-89/CE/DDA/WSK-64 dated 13-03-2019 wherein the post of Attendant has been Re-designated as junior Technician (Mechanical) is against the rules and law.

 Through
Amanullah Pirzada

Advocate of High court

INTERIM RELIEF: That the respondents may kindly be restrain from taking any adverse action against the appellant till the final disposal of this instant service appeal.

"A"
"B"
"C"
"D"

app



PAKISTAN WATER & POWER DEVELOPMENT AUTHORITY

Tel: 091/2385107
PBX: 091/2385100/2385200
Fax: 091/2385102

Office of the
Chief Engineer (Hydel) North,
WAPDA, Warsak.

No. 1150-56 /CE/DDA/WSK-106

Dated: 01/04/2015

Mr. Abdul Majeed S/O Umer Daraz Khan
O/O SE/PD Jabban (Rehab) Project

Subject:- Employment Under Wapda On Regular Basis

In Pursuance to this office order No.1124-27/CE/DDA/WSK-106 dated 01.04.2015 upon completion of required length of service on daily wage basis, you are hereby appointed as Sub Engineer (Mech)/ Attendant BPS-14 under Pakistan Water and Power Development Authority on regular basis on the following terms and conditions:-

1. a. Pay at Rs.8000/-PM in BPS-14 viz (8000-610-26300) plus usual allowances as admissible under the rules of the Authority.
- b. House Rent and other allowances as admissible from time to time under the rules of Authority.
- c. Traveling allowance and leave at such rates as may be prescribed by the Authority.
- d. Provident fund benefits with effect from the date of appointment as per rules of the Authority.
- e. Medical facilities as admissible under the Wapda Medical Attendance Rules as amended from time to time.
2. One year probation period in the first instance, if your work and conduct during the period of probation is found un-satisfactory, the appointing authority may, in his discretion dispense with your services immediately without giving prior notice to you.
3. You will be governed by such conditions of the Authority as prescribed from time to time.
4. The competent authority may change your place of service or appointment, designation, responsibilities of duties from time to time as deems fit.
5. Before reporting for duty you shall produce a certificate in duplicate of Medical fitness from the office of Medical Superintendent Wapda Hospital Peshawar, at your own expenses.
6. You will be required to furnish two character certificates from persons of repute. You also will be required to furnish a declaration in writing to the effect that you have not been convicted, screened out or otherwise removed from Govt Service/Wapda service or other statutory service or from the service of any foreign or local organization/institution/office.
7. a. You will make a declaration, in writing of all moveable and un-moveable properties, including shares, certificates, securities, insurance policies, cash and jewelry of the value of Rs.50,000/- or more belonging to or held by him or by a member of your family individually or collectively as defined in the Pakistan WAPDA Employees Conduct Rules-1978.

Attested



PAKISTAN WATER & POWER DEVELOPMENT
AUTHORITY

Tel: 091-2385107
PBX: 091-2385100/2385200
Fax: 091-2385102

Circulate to all

Office of the
Chief Engineer (Hydel) North,
WAPDA, Warsak Peshawar.

No. 10850-56 /CE/DDA/WSK-10.1

dated: 17 / 09 / 2018

- 452
24/9/18
19 SEP 2018
FILE NO 2122
- 01- RE Warsak P/Station
02- RE Dargai P/Station
03- RE Jabban
04- RE GGPS Chitral.
05- RE KG Bannu
06- RE HPS Chitral
- IMMEDIATE/URGENT**

SUBJECT:- **PROMOTION OF TECHNICAL STAFF- SENIORITY LISTS**

Seniority lists of the following categories of Technical Staff pertaining to Hydel North region WAPDA Warsak are enclosed herewith for scrutiny/circulation at your end.

- | | | |
|-----|---|-------|
| 01- | Asstt: Foreman (E&M)/Workshop Supdt: | (F/A) |
| 02- | Attendant BPS-14 | (F/B) |
| 03- | Combined Seniority of Turner/Miller/Jr Tech | (F/C) |
| 04- | Jr Tech (E&M) BPS-14 | (F/D) |
| 05- | Assistant Station Attendants (BPS-07) | (F/E) |

Any objections to the seniority may be furnished upto 25.09.2018 enabling this office to proceed further after due date no appeal/representation will be considered.

R. B. Shah
Dy: Director (Admn) Hydel
North Wapda, Warsak.

C.C.:-

1) A.P.S to (C.E) WSK

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 SENIORITY LIST OF ATTENDANTS WORKING AT HYDEL NORTH REGION WARSAK

Sr. No.	Name	Qualification	Date of Birth	Date of initial appointment	Date of Promotion as Attendant	Date of Arrival in HNR Wsk	Date of counted for seniority	Domicile of employee	Status of SOP			Employment status		Station of duty
									Basic Operator Course	Advance Operator Course	OPE	Direct	Promoted	
									13	14	15	16	17	18
1								FATA	Passed		Passed		Promoted	Warsak
1	Ajmal Shah	O.E. Matric	13.08.1962	06.10.1981	10.10.2000	10.10.2000	10.10.2000	KPK	Passed		Passed		Promoted	Warsak
2	Nisar Muhammad	do Matric	16.05.1966	06.07.1987	01.02.2001	01.02.2001	01.02.2001	KPK	Passed		Passed		Promoted	Warsak
3	Muhammad Alam	Promoted Fsc	12.12.1963	06.07.1983	27.05.2003	27.05.2003	27.05.2003	KPK	Passed		Passed		Promoted	Warsak
4	Nasib Gul	M.H.E. M.A	08.03.1969	29.12.1988	30.05.2003	30.05.2003	30.05.2003	KPK	Passed		Passed		Promoted	GG Chitral
5	Wazir Ahmad	Matric	12.01.1969	02.05.1989	31.05.2003	31.05.2003	31.05.2003	KPK	0		Passed		Direct	Warsak
6	Tariq Mehmood	Matric	06.03.1964	11.12.1982	20.12.2004	20.12.2004	20.12.2004	KPK	Passed		Passed		Promoted	Warsak
7	Qabool Shah	MA	15.03.1959	20.04.1979	15.01.2001	08.11.2005	08.11.2005	punjab	Passed		Passed		Promoted	K/G
8	Muhammad Sharif	Matric	09.02.1965	30.05.1983	08.03.1999	29.05.2006	29.05.2006	KPK	Passed		0		Promoted	K/G
9	Habib-ur-Rehman	Matric	01.01.1969	17.04.1990	17.05.2007	17.05.2007	17.05.2007	KPK	Passed		0		Promoted	Warsak
10	Moula Jan	Matric	13.11.1971	19.04.1990	17.05.2007	17.05.2007	17.05.2007	KPK	Passed		Passed		Promoted	Warsak
11	Ilbar Gul	Matric	01.04.1964	08.12.1985	16.06.2007	16.06.2007	16.06.2007	KPK	0		Passed		Promoted	Warsak
12	Adam Sher	M.A	07.02.1968	21.02.1967	21.06.2008	21.06.2008	21.06.2008	FATA	Passed		Passed		Promoted	Warsak
13	Zakirullah	Matric	11.06.1965	30.11.1988	21.06.2008	21.06.2008	21.06.2008	FATA	Passed		Passed		Promoted	Warsak
14	Hrshad Khan	Msc	01.03.1969	26.12.1988	04.09.2008	04.09.2008	04.09.2008	KPK	Passed		Passed	Direct		Warsak
15	Muhammad Israr	DAE	10.12.1989	05.06.2009	05.06.2009	05.06.2009	05.06.2009	FATA	Passed		Passed	Direct		Warsak
16	Hayat Gul	F.A	27.01.1974	19.03.1995	27.02.2006	06.12.2009	06.12.2009	KPK	0		0	Direct		K/G
17	Usman Khan	B.tech	12.12.1986	21.06.2010	21.06.2010	21.06.2010	21.06.2010	MKD	0		0	Direct		Jabban
18	Waseem Hassan Khan	DAE	01.01.1990	28.07.2011	28.07.2011	28.07.2011	28.07.2011	KPK	0		Passed	Direct		Warsak
19	Amir Navraz	DAE	16.08.1989	02.08.2011	02.08.2011	10.01.2014	02.08.2011	KPK	0		0	Direct		Warsak
20	Muhammad Ali	DAE	01.04.1982	04.10.2011	04.10.2011	23.12.2014	04.10.2011	KPK	Passed		Passed		Promoted	Warsak
21	Hayat Khan	Matric	06.10.1958	01.05.1977	26.06.2012	26.06.2012	26.06.2012	KPK	Passed		Passed		Promoted	Warsak
22	Saeedullah Jan	Matric	01.04.1970	08.01.1991	26.06.2012	26.06.2012	26.06.2012	KPK	Passed		Passed		Promoted	Warsak
23	Aman Said	Matric	11.02.1962	26.11.1981	01.12.2012	01.12.2012	01.12.2012	FATA	Passed		Passed		Promoted	Warsak
24	Adil Zada	Matric	22.04.1971	21.4.1990	01.12.2012	01.12.2012	01.12.2012	MKD	0		0	0	Promoted	Dargai
25	Bacha Rehman	Matric	22.04.1971	21.4.1990	01.12.2012	01.12.2012	01.12.2012	MKD	0		0	Direct		Chitral
26	Muhammad Waseem Ahmad	DAE	14.02.1967	14.02.1985	21.02.2013	21.02.2013	21.02.2013	KPK	Passed		0	Direct		Dargai
27	Muhammad Waseem Ahmad	DAE	19.04.1984	03.09.2009	03.09.2009	25.07.2013	25.07.2013	KPK	0		0	Direct		Warsak
28	Asfandyar	DAE	04.02.1984	31.07.2013	31.07.2013	31.07.2013	31.07.2013	KPK	0		Passed	Direct		Jabban
29	Waqar Ahmad	DAE	05.11.1989	31.07.2013	31.07.2013	31.07.2013	31.07.2013	KPK	0		0	Direct		Warsak
30	Fayyaz	DAE	04.03.1991	31.07.2013	31.07.2013	31.07.2013	31.07.2013	KPK	0		0	Direct		Warsak
31	Muhammad Mazullah	DAE	01.08.1994	28.11.2013	28.11.2013	28.11.2013	28.11.2013	FATA	Passed		0	Direct		KG Bannu
32	Ghani Masood	DAE	07.02.1983	08.10.2005	03.06.2014	03.06.2014	03.06.2014	MKD	0		0	0	Promoted	Dargai/Wsk
33	Rehullah	Matric	15.03.1962	08.07.1981	05.08.2014	05.08.2014	05.08.2014	MKD	0		0	0	Promoted	Jabban
34	Saiful Jalal	Matric	08.10.1962	29.01.1981	05.08.2014	05.08.2014	05.08.2014	MKD	0		0	0	Promoted	K/G
34	Umar Nazir	Matric	12.02.1963	17.09.1981	07.11.2014	07.11.2014	07.11.2014	KPK	Passed		0	0	Promoted	K/G

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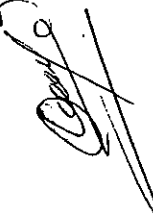
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11

No.	Name	Qualification	Date of Birth	Date of initial appointment	Date of Promotion as Attendant	Date of Arrival in HNR Wsk	Date of counted for seniority	Domicile of employee	Status of SOP			Employment status		Station of di
									Basic Operator	Advance Operator	DPE	Direct	Promoted	
35	Zahid Khan	D.A.E	01.04.1995	12.11.2014	12.11.2014	12.11.2014	12.11.2014	KPK	0		0	Direct		KG
36	Irfanullah	D.A.E	23.02.1984	31.12.2014	31.12.2014	31.12.2014	31.12.2014	MKD	0		0	Direct	12	Jabban
37	Moazzam Hafiz	D.A.E	20.11.1990	31.12.2014	31.12.2014	31.12.2014	31.12.2014	KPK	0		0	Direct	13	Jabban
38	Abdul Majeed	D.A.E	03.03.1986	02.04.2015	02.04.2015	02.04.2015	02.04.2015	KPK	0		0	Direct		Warsak
39	Muhammad Amir Khan	D.A.E	27.04.1990	02.04.2015	02.04.2015	02.04.2015	02.04.2015	KPK	0		0	Direct	14	Jabban
40	Usman Sadiq	B.Tech H	31.07.1990	16.07.2015	16.07.2015	16.07.2015	16.07.2015	FATA	0		0	Direct		Warsak
41	Izhar Khan	D.A.E/BA	17.02.1990	07.08.2015	07.08.2015	09.03.2017	09.03.2017	Lower Dir	0		0	Direct	15	Dargai
42	Ramim Khan	Matric	08.08.1972	28.11.1991	15.02.2015	15.02.2016	15.02.2016	Bannu	0		0		Promoted	
43	Raid Ali	Matric	02.04.1967	27.07.1986	29.05.2017	29.05.2017	29.05.2017	MKD	0		0		Promoted	
44	Hamidulah	Matric	02.07.1962	03.05.1989	01.02.2018	01.02.2018	01.02.2018	Chitral	0		0		Promoted	GGChitral
45	Fakhr ud Din	Matric	01.01.1973	28.10.2005	01.02.2018	01.02.2018	01.02.2018	Chitral	0		0		Promoted	GGChitral
46	Shahid Ali	DAE (Elect)	06.02.1988	14.02.2018	14.02.2018	14.02.2018	14.02.2018	MKD	0		0	DEC	27	GGChitral
47	Abdul razzaq	DAE (Elect)	20.07.1993	14.02.2018	14.02.2018	14.02.2018	14.02.2018	Punjab	0		0	DEC	28	GGChitral

9. Umair Hanjra

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PAKISTAN WATER & POWER DEVELOPMENT
AUTHORITY

Tel: 091-2385107
PBX: 091-2385100/2385200
Fax: 091-2385102

Office of the
Chief Engineer (Hydel) North,
WAPDA, Warsak Peshawar

No. 11690-96 /CE/DDA/WSK-40.11

dated: 29 /10/2018

- 01- RE Warsak Power Station
(i)O.E Wsk (ii) EME Wsk (iii) MME Wsk (iv) ITRE Wsk (v) PI&CE Wsk
02- RE Golen Gol Hydel Power Chitral
(i)O.E,(ii) MME,(iii) EME Golen Gol Hydel Power Station Chitral
03- RE Dargai Power Station
04- RE Jabban Power Station
05- RE Chitral Power Station
06- RE KG Power Station Bannu.

URGENT

Subject:- **TENTATIVE SENIORITY LISTS OF TECHNICAL STAFF WORKING AT
HYDEL NORTH REGION WARSAK**

Ref Director General (HR&Admn) Rules Directorate Wapda House
Lahore Office Memo No.D/DD(Rules)/07452/40/III/14369-76 dated 30.08.2018
and this office letter No.12214-19 dated 10.10.2018

Tentative Seniority lists of the following Technical Staff working at Hydel
North Region Wapda Warsak in accordance with New Hydel Staff Service Rules-2018 are
hereby circulated for information of all concerned. The same may be floated on the Notice
Boards of each section.

- (1) Attendant working in Operation/PI&CE Sections.
- (2) Jr Tech (Mech) Working in Mechanical Sections.
- (3) Jr Tech (Elect) working in Electrical Sections

Representations/objections to the seniorities be forwarded to this office upto
09.11.2018 after which no appeal shall be entertained.

DA/As above.

Copy to:-

File No.64 & 10.1 of this section.

AMM
DY:DIRECTOR(ADMN)
HYDEL NORTH REGION WARSAK

Noted
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PAKISTAN WATER & POWER DEVELOPMENT
AUTHORITY

Tel: 091-2385107
PBX: 091-2385100/2385200
Fax: 091-2385102

Office of the
Chief Engineer (Hydel) North,
WAPDA, Warsak-Peshawar.

No. 1484-89 ICE/DDAWSK-64

dated: 13/03/2019

OFFICE ORDER

In compliance with Authority's Office Memorandum No.D/DD(Rules) /07452/40/III/14369-76 dated 30.08.2018 and based on the recommendation of committee constituted vide 'Office Order No.1312-16/CE/DDAWSK-64 dated 08.03.2018, approval is hereby accorded for re-designation of the below mentioned categories of posts as structured in the Pakistan Wapda Hydel Generation Staff Service Rules-2018 w.e.f 30.08.2018:

Electrical Maintenance Section Warsak Power Station				
01	Battery Room Attendant, Attendant, Elevator	14	14	Junior Technician (Elect)
02	Air Conditioning Attendant	14	14	Junior Technician (A.C)
Mechanical Maintenance Section Warsak Power Station				
01	Attendant	14	14	Junior Technician (Mech)

Chief Engineer (Hydel)
North WAPDA Warsak

Cc:

- 01- RE Warsak Power Station
- 02- MME/EME/OE Warsak Power Station
- 03- B&AO (Gen) Warsak Power Station.
- 04- File No.79 of this office.

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(*) "E" 10
Pakistan Water and Power Development Authority

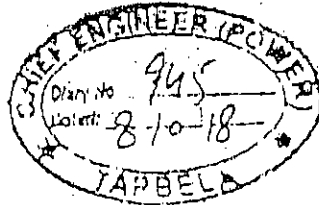
Tel: 99202508 &
99202211 / 2309
Fax: 99203532

Office of DG (HR & Admn),
Rules Directorate,
309-WAPDA House, Lahore.

No. DD(Rules)07462/40/III/37a

Dated: 03.09.2018
/o

Director (Admn) Hydrol,
WAPDA, Wapda House,
Lahore.



Subj: CLARIFICATION - THE PAKISTAN WAPDA HYDEL GENERATION STA
SERVICE RULES - 2018

Ref: Your office letter No. GMH/Admn/A-49/3/87408-09 dated 12.09.2018.

1. It is to inform that the Attendants Operation (BPS-14) internally deputed in Electrical Mechanical Sections of the Power House but having combined seniority as Attendants Operations may not be re-designated as Jr. Technicians
2. However, the posts in the respective sections will stand re-designated as per Service Rules.

OFFICE OF G.M. (HYDEL) OPR.

End: No. GMH/Admn/A-49/3/86781

Dated: 03/10/2018.

Copy of above is forwarded to Chief Engineer (Power) TD, Tarbela for information and further necessary action, please.

(Harris Basharat)
Asstt. Dir. (Admn) Hy

C.C.

Master file.

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Page-

Pakistan Water and Power Development Authority

Tel. 99202508 &

99202211/2309

Fax: 99203532

No. DD(Rules)/07452/III/372

Office of DG (HR& Admn)

Rules Directorate

309-WAPDA House Lahore

Dated 03-09(10)-2018

Director (Admn) Hydel,
WAPDA, WAPDA House
Lahore

Subject: CLARIFICATION – THE PAKISTAN WAPDA HYDEL GENERATION STAFF
SERVICE RULES – 2018

Ref: Your office letter No. GMH/Admn/A-49/3/87408-09 dated 12-09-2018

It is inform that the Attendants Operation (BPS-14) internally deputed in Electrical and Mechanical Sections of the Power House but having combined seniority as Attendants Operations may not be re-designated as Jr. Technicians.

2. However, the posts in the respective sections will stand re-designated as per Service Rules.

OFFICE OF G.M. (HYDEL) OPR

End. No. GMH/Admn/A-49/31/86781

dated 03-10-2018.

Copy of above is forwarded to Chief Engineer (Power) TD Tarbela for information and further necessary action please.

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To Be True Copy

-Sd-

(Harris Basharat)
Asstt: Dir. (Admn) Hydel

CC

Master File

ATTESTED

To

The General Manager,
Hydel (Operations) WAPDA House, Lahore.

Through Proper Channel

Subject: APPEAL/ DEPARTMENTAL REPRESENTATION AGAINST THE IMPUGNED SENIORITY LIST.

Respected sir,

With due regard it is submitted that a seniority list of the Attendants/ Technical staff working at Hydel North Region Warsak has been issued and circulated vide letter No. 10850-56/CE/DDA/WSK-10.1 dated 17-09-2018 wherein the undersigned have been placed on Serial No.38 of the seniority list. That in the meanwhile, the Authority has issued another seniority list vide letter No. 11690-96/ CE/DDA/WSK-40.11 dated 29-10-2018 and in consequence thereof, letter No. 1484-89/CE/DDA/WSK-64 DATED 13-03-2019 by which the posts have been re-designated as Junior Technician wherein the name of undersigned has been omitted with malafide while the junior most and blue eyed officials are placed senior to the undersigned of the impugned seniority list maintained by the Authority. Similarly the prospects of promotion have been curtailed. That the impugned re-designation is also without any justification or option towards the appellant. So much so, I have not been given a chance of personal hearing which is again highly discriminatory and against the established norms of natural justice. It is worth to mention here that the undersigned is highly qualified.

It is therefore, most humbly prayed that on acceptance of this representation, the seniority list issued vide letter dated 17-09-2018 may very graciously be restored /maintained so as to remove the sense of discrimination among the deserving staff.

I want to be heard in person

Yours obediently
(Abdul Majeed)
Warsak Power Station

ATTESTED



PAKISTAN WATER & POWER DEVELOPMENT
AUTHORITY

Tel: 091-2385107
PBX: 091-2385100/2385200
Fax: 091-2385102

Office of the
Chief Engineer (Hydel) North,
WAPDA, Warsak Peshawar.

No. 2435-36 /CE/DDA/WSK/ACF

dated: 25/04/2019

Mr. Naseeb Gul
Jr Technician (Mech)
Warsak Power Station

CONFIDENTIAL

Subject: **SHOW CAUSE NOTICE**

Consequent upon consideration of your explanation dated 18.04.2019 received in this office through RE Warsak Office letter No.7406-08 dated 24.04.2019 adduced by you in response to this office explanation letter issued to you vide No.2115-16/CE/DDA/WSK/ACF dated 15.04.2019, I Abdul Sattar Afridi, Chief Engineer (Hydel) North Wapda Warsak being competent authority under Rules-2(3) of the Pakistan WAPDA employees (E&D) Rules-1978, am provisionally of the opinion as to why all or any of the minor/major penalty/penalties as defined under Rules-4 ibid should not be imposed upon you.

You are, therefore hereby informed under Rules-5(v) (b) ibid to show cause in writing within-14 days from the receipt of this show cause notice, why proposed action should not be taken against you.

Your reply to the show cause notice must reach the undersigned within the stipulated period failing which it will be presumed that you have no defence to offer and exparte action will be taken again you.

You are also allowed to be heard in person in this case if you so desired.

(Abdul Sattar Afridi)
Chief Engineer (Hydel)
North Wapda Warsak

CC:-

RE Warsak Power Station.

ATTESTED



PAKISTAN WATER & POWER DEVELOPMENT
AUTHORITY

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Office of the
Chief Engineer (Hydel) North,
WAPDA, Warsak Peshawar.

No. 2518-19 /CE/DDA/WSK/ACF

dated: 29 /04 /2019

Mr. Abdul Majeed,
Junior Technician (Elect)
Warsak P/Station

CONFIDENTIAL

Subject: CHARGE SHEET

You Mr. Abdul Majeed Junior Technician (Elect) working under Resident Engineer Warsak Power Station has committed the following acts of commissions / omissions:

You have committed the breach of Service discipline by hindering the official process for implementing the authority directions vide office order No 1484-89/CE/DDAWSK-64 date 13.03.2019.

It is further informed that you have tried to misguide the authority by quoting that you have never been heard by Chief Engineer (Hydel) North Warsak whereas you never requested for the personal hearing in the past.

You are therefore hereby directed to explain your position regarding the above mentioned misconduct within 14-days failing which it will be presumed that you have nothing in your defence and action will be taken against you under E&D Rules 1978 which may incur any minor or major penalty. You are also require to state the same time in your written statement whether you desire to be heard in person.

Statement of allegation is attached.

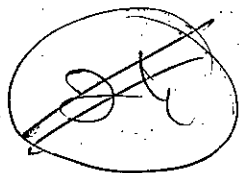

(Abdul Sattar Afridi)
Chief Engineer (Hydel)
North WAPDA Warsak

CC:-

01- R.E Warsak Power Station.

ATTESTED

STATEMENT OF ALLEGATIONS





To implement the orders of competent authority conveyed vide Office Memo No.D/DD(Rules)/07452/40/III/14269-76 dated 30.08.2018, a committee was constituted by competent authority vide office order No.1312-16/CE/DDA/WSK-64 dated 08.03.2019, including your sectional head (EME).

- a. You have committed misconduct to lawful orders of your superiors by using unparliamentarily language i.e in your application dated 11.04.2019 you have mentioned that the "undersigned (Mr. Abdul Majeed) has been omitted with mailafied while junior most and blue eyed officials are placed senior to you in the impugned seniority list maintained by the authority".
- b. You have made a false statement by writing "Similarly the prospects of promotion have been curtailed".
- c. You have disregard the orders by writing "That the impugned re-designation is also without any justification or option towards the appellant so much so, you have not been given a chance of personal hearing which is again highly discriminatory and against the established norms of natural justice."
- d. Instead of submitting the appeal to Chief Engineer (Hydel) North Wapda Warsak you disregard the channel and wrote an appeal to General Manager (Hydel) Opr Wapda House Lahore.
- e. You have never requested for personal hearing, therefore your claim is baseless which needs proof.


(Abdul Sattar Afridi)
Chief Engineer (Hydel)
North WAPDA Warsak


ATTESTED

To

The Chief Engineer (Hydel),
North Wapda Warsak.

Subject: REPLY TO THE CHARGE SHEET

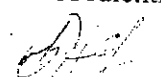
Reference: Letter No. 2518-19/CE/DDA/WSK/ACF dated 29-04-2019

Respected Sir,

With due respect it is submitted that the applicant feeling aggrieved of seniority list dated 29-10-2018 had filed a departmental appeal before the competent authority. The same was got drafted by some third person and the words used in the appeal were the creation of his mind. The applicant/ undersigned had no intention whatsoever of disregard or disrespect of his esteemed superior officers. Whenever I have preferred any appeal or representation, it is meant for the redressal of my grievances and through proper channel. The applicant has never made any direct correspondence with his esteemed officers nor has he ever thought of hindering the official process or committing any misconduct. However, despite of all due care and caution, if there have been mentioned any word(s) which were unparliamentarily or have annoyed your good self, for that I offer my due apology in your honor.

It is therefore, most humbly prayed that on acceptance of this reply, the above referred charge sheet etc may please be recalled. I shall be very careful in future.

Yours obediently


(ABDUL MAJEED)
ATTENDANT
WARSAK POWER STATION

ATTESTED



PAKISTAN WATER & POWER DEVELOPMENT
AUTHORITY

Tel: 091-2385107
PBX: 091-2385100/2385200
Fax: 091-2385102

Office of the
Chief Engineer (Hydel) North,
WAPDA, Warsak Peshawar.

dated: 15 /04 / 2019

No. 2115-16/CE/DDA/WSK/ACF

Mr. Naseeb Gul, Junior Technician (Mech)
Mechanical Section
Warsak Power Station

CONFIDENTIAL

REGISTERED

Subject: EXPLANATION

You Mr. Naseeb Gul, Junior Technician (Mech) working under Resident Engineer Warsak Power Station has committed the following acts of commissions / omissions:

- You have committed the breach of Service discipline by hindering the official process through your application dated 08.10.2018. In the past you have submitted a chain of applications vide dated 23.10.2018, dated 06.11.2018 and appeal dated 25.03.2019.
- You have also committed disobedience to lawful orders of your superiors by using unparliamentary language i.e in your application dated 11.04.2019 you have mentioned that the "undersigned (Mr. Naseeb Gul) has been omitted with mailafied while the Junior most in blue eyed officials are placed senior to the undersigned of the impugned seniority list maintained by the Authority" plus "the prospects of promotion have been curtailed that the impugned re-designation is also without any justification".

You are therefore hereby directed to explain your position regarding the above mentioned misconduct within 07-days failing which it will be presumed that you have nothing in your defence and action will be taken against you under E&D Rules 1978 which may incur any major or minor penalty. You are also required to state the same time in your written explanation whether you desires to be heard in person.

Chief Engineer (Hydel)
North WAPDA Warsak

CC:-
01- R.E Warsak Power Station.

ATTESTED
(To EC True Copy)

ATTESTED

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To

The Chief Engineer (Hydel)
North WAPDA Warsak.

Through proper channel

Subject: REPLY TO THE EXPLANATION

Reference: Your No. letter No. 2115-16/CE/DDA/WSK/ACF dated 15-04-2019

Respected sir,

With due regard it is submitted that the undersigned being aggrieved of the seniority list and consequent re-designation, has filed the departmental appeal before the competent authority which is, with due respect, the vested and fundamental right, guaranteed under the Constitution of Islamic Republic of Pakistan, 1973 as well the settled service rules. Moreover, whenever the undersigned preferred any appeal or representation, the same was meant for the redressal of his grievances. These applications/appeals were made through proper channel and the undersigned never made any direct correspondence with his esteemed officers nor the undersigned has ever thought of hindering the official process. However, despite of all due care and caution, if there have been mentioned any word(s) which have annoyed your good self, for that I offer my due apology in your honor.

It is therefore, most humbly prayed that on acceptance of this reply, the above referred explanation letter may please be recalled. I shall be very careful in future.

I want to be heard in person

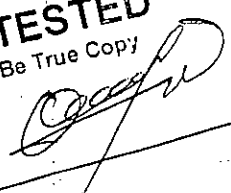
Yours obediently

(NASEEB GUL)

Attendant, Warsak Power Station

18-4-2019

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To Be True Copy



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PAKISTAN WATER & POWER DEVELOPMENT
AUTHORITY

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Tel: 091-2385107
PBX: 091-2385100/2385200
Fax: 091-2385102

Office of the
Chief Engineer (Hydel) North,
WAPDA, Warsak Peshawar.

No 3896-98 /CE/DDA/WSK/ACF

dated: 07/05/2019

- Read (1) Departmental appeal of Mr. Abdul Majeed Jr. Tech (Elect) Warsak Power Station.
Read (2) Charge sheet issued to Mr. Abdul Majeed Jr. Tech (Elect) Warsak Power Station.
Read (3) Reply of charge sheet submitted by Mr. Abdul Majeed Jr. Tech (Elect) Warsak Power Station.
Read (4) Inquiry committee constituted vide O/O No.3039-40 dated 20.05.2019.
Read (5) Recommendations of inquiry committee received vide letter No.8442-43 dated 30.05.2019.

OFFICE ORDER

Disciplinary action was initiated against Mr. Abdul Majeed, Junior Technician (Elect) working under Resident Engineer Warsak Power Station. He was served Charge Sheet No.2518-19 dated 29.04.2019.

Mr. Abdul Majeed, Junior Technician (Elect) of Warsak Power Station was committed the breach of Service discipline by hindering the official process. He also committed disobedience to lawful orders of his superiors by using unparliamentary language which is against the office decorum.

After going through in detail of the case of Mr. Abdul Majeed, Junior Technician (Elect), it is established that his actions/steps as official were not in line with the Authority's instructions/ policy. Based on the recommendations of inquiry committee, the undersigned being the competent authority, have decided to impose the minor penalty of "Censure" upon Mr. Abdul Majeed, Junior Technician (Elect) as mentioned in Section -4 (a) of Pakistan WAPDA Employees (E&D) Rules 1978.

(Abdul Sattar Afridi)
Chief Engineer (Hydel)
North WAPDA Warsak

CC:-
06- R.E Warsak Power Station.
07- EME Warsak Power Station.
✓ 08- Official concerned.
09- MF

ATTESTED



PAKISTAN WATER & POWER DEVELOPMENT
AUTHORITY

Tel: 091-2385107
PBX: 091-2385100/2385200
Fax: 091-2385102

Office of the
Chief Engineer (Hydel) North,
WAPDA, Warsak Peshawar.

No. 2271-77 /CE/DDA/WSK-10-1

dated: 22 / 04 / 2019

OFFICE ORDER

Based on the recommendations of Promotion Board, promotion posting of the following technical staff of (Hydel) North Region WAPDA Warsak are hereby issued with immediate effect and until further orders:

S.#	Name	Present Posting	New Posting	Remarks
1	Mr. Ajmal Shah	Working as Attendant under RE Warsak	Promoted as Operator (BPS-16) and posted under R.E Warsak	Against a vacant post
2	Mr. Wazir Ahmad	Working as Attendant under RE Chitral	Promoted as Operator (BPS-16) and posted under R.E Chitral	Against a vacant post
3	Mr. Muhammad Sharif	Working as Attendant under RE Warsak	Promoted as Operator (BPS-16) and posted under R.E Dargai	Against a vacant post
4	Mr. Habib ur Rehman	Working as Attendant under RE KG Bannu	Promoted as Operator (BPS-16) and posted under R.E KG Bannu	Against a vacant post
5	Mr. Moola Jan	Working as Attendant under RE KG Bannu	Promoted as Operator (BPS-16) and posted under R.E KG Bannu	Against a vacant post
6	Mr. Nisar Muhammad	Working as Attendant under RE Warsak	Promoted as Operator (BPS-16) and posted under R.E GGHP Chitral	Against a vacant post
7	Mr. Irshad Khan	Working as Attendant under RE Warsak	Promoted as Operator (BPS-16) and posted under R.E KG Bannu	Against a vacant post

The promotion order of the officials at Sr No.3,4,5 & 7 will take effect after successful completion of training course (which will complete on 03.05.2019).

Arrival/Departure of the officials concerned may be intimated to this office but not later than 10.05.2019. After due date their promotion will be deemed cancelled and placed at the bottom of seniority in their own cadre and (E&D) Rules shall be initiated against him.

This issue with the approval of competent Authority.

DY: DIRECTOR (ADMN)
HYDEL NORTH WARSAK

CC:-

1. R.E Warsak Power Station.
2. R.E GGHP Chitral
3. RE Dargai.
- 6- RE Chitral /KG Power Station Bannu
7. B&AO (Gen) Wapda Warsak.
8. Officials concerned.

ATTESTED

Pakistan
Water & Power Development Authority

PBX No. 091-2385100-2385200
Ph No. 091-2385104-6002802
Fax No. 091-2385087
Email: residentengineerwsk@gmail.com

Office of the
Resident Engineer
WAPDA Warsak

NO:RE/WSK/ 7882-83

Dated 07 /05/2019

Chief Engineer (Hydel)
North WAPDA Warsak.

Subject: REQUEST FOR INCLUSION THE NAME IN SENIORITY LIST OF
OPERATION SECTION

An application addressed to your good office in r/o of Mr. Naseeb Gul Attentent received in this office vide MME wapda Warsak Office U/o No 3875 dated 07-08-2019, in which the official mentioned as he was posted under Operation Engineer wapda warsak vide office order No. 4624-28 dated 10-01-2011, but due to work load in Mechanical section, the official was not relived and verbally kept in Mecanicani section by the then Resident Engineer Wapda Warsak, as written by the applicant in his request (attached in original) please.

Encl: as above

Resident Engineer
WAPDA Warsak

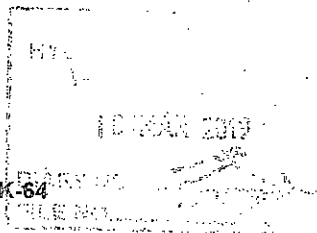
Copy to:-
MME Wapda Warsak for information.

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PAKISTAN WATER & POWER DEVELOPMENT
AUTHORITY

Tel: 091-2385107
PBX: 091-2385100/2385200
Fax: 091-2385102



Office of the
Chief Engineer (Hydel) North,
WAPDA, Warsak Peshawar.

No. /CE/DDA/WSK-84

dated: 03/03/2019

OFFICE ORDER

In compliance with Authority's Office Memorandum No.D/DD(Rules) /07452/40/III/14369-76 dated 30.08.2018 and based on the recommendation of committee constituted vide Office Order No.1312-16/CE/DDA/WSK-84 dated 08.03.2018, approval is hereby accorded for re-designation of the below mentioned categories of posts as structured in the Pakistan Wapda Hydel Generation Staff Service Rules-2018 w.e.f 30.08.2018:

S#	Name of Category	Existing BPS	Revised BPS	The nomenclature of the post now converted as
Electrical Maintenance Section Warsak Power Station				
01	Battery Room Attendant, Attendant, Attendant, Elevator	14	14	Junior Technician (Elect)
02	Air Conditioning Attendant	14	14	Junior Technician (A.C)
Mechanical Maintenance Section Warsak Power Station				
01	Attendant	14	14	Junior Technician (Mech)

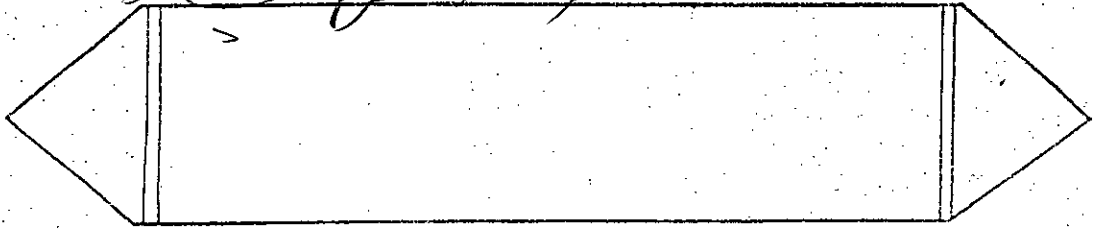

Chief Engineer (Hydel)
North WAPDA Warsak

Cc:

- 01- RE Warsak Power Station
- 02- MME/EME/OE Warsak Power Station
- 03- B&AO(Gen) Warsak Power Station.
- 04- File No.79 of this office.

ATTESTED

بعدالت سے منظور کیا گیا



عبدالحمید بنام 2 مخفی حکومت

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آئی کہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام کے لیے احوال الکریمہ ڈوہ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
اہمورت ڈگری کرنے اجراء اور صولتی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرا این پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ اتوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Accepted by

[Handwritten signature]

عبدالحمید بنام 2 مخفی حکومت

الرقوم 19
ماہ جولائی 2019

بمقام
وہ الع
کے لئے منظور ہے۔