



18 January 2023

RULES CHANGE COMMITTEE

Philippine Electricity Market Corporation
18/F Robinsons Equitable Tower,
Ortigas Center, Pasig City

Attention: **Ms. Kathleen R. Estigoy**
Rules Review Division, Market Assessment Group

Dear Rules Change Committee:

We wish to inform you that MERALCO has emailed the Committee Secretariat at mag_rrd@wesm.ph our comments on the proposed amendments to the WESM Rules and WESM Manuals, as follows:

| Topic | Attachment File Name | Date Submitted / Sending Email Address Used |
|--|---|---|
| Proposed General Amendments to the WESM Rules, Retail Rules and Market Manuals on the Implementation of the Electric Retail Aggregation Program (ORCP-WR-RR-WM-RM-22-11) | MERALCO Comments Retail Aggregation 2023-01-18 final.docx | 18 January 2023 / jivdelrosario@meralco.com.ph |

For any question and clarifications, please do not hesitate to contact us through Mr. Manuel Luis Zagala, Lead Specialist, Utility Economics at mlnzagala@meralco.com.ph.

For your consideration.

Thank you.

Sincerely yours,

LAWRENCE S. FERNANDEZ
Vice President and Head
Utility Economics



ORCP-WR-RR-WM-RM-22-11

Date Received by RCC (as General Proposal): 23 Nov 2022

REQUEST FOR MARKET RULES AND MANUALS AMENDMENTS

Proposals made only under this prescribed form shall be accepted and considered as submitted.

This request for amendments is to be submitted to:

Rules Change Committee

Attention: WESM Governance Committee Secretariat
Philippine Electricity Market Corporation
18/F Robinsons Equitable Tower
ADB Avenue, Ortigas Center
Pasig City, 1605 Philippines
Email addresses: rcc@wesm.ph / mag_rrd@wesm.ph
Contact No: (+632) 8631-8734

I. Proponent's Information

| | |
|-----------------|--|
| Name | Richard J. Nethercott |
| Designation | President and CEO |
| Company | Independent Electricity Market Operator of the Philippines, Inc. |
| Company Address | 19/F Robinsons Equitable Tower ADB Ave. Ortigas Center |
| | Pasig City |
| Telephone No. | 02 5318 9376 |
| Fax. No. | 02 8636 0802 |
| Email Address | richard.nethercott@iemop.ph |



II. Amendment Information

Proposed Amendments to the (please tick the box):

☒ WESM Rules* ☒ Retail Rules*

☒ Market Manual: WESM Manual on Registration, Suspension and De-registration Criteria and Procedures Issue 12.1*
Retail Manual on Registration Criteria and Procedures Issue 3.1*
Retail Manual on Market Transactions Procedures Issue 3.1*
Retail Manual on Metering Standard and Procedures Issue 5.1*

** including pending revisions pursuant to RCC Resolution No. 2022-07*

Topic: Proposed Amendments on Implementation of the Electric Retail Aggregation Program

Proposed Classification of Amendments (please tick the box):

☒ General ☐ Minor ☐ Urgent

If Urgent, reason for urgency:



III. SUMMARY OF THE PROPOSED RULES CHANGE

Amendments to the WESM Rules, Retail Rules and various Market Manuals are proposed to harmonize existing rules with the issuances¹ on the implementation of the Electric Retail Aggregation Program.

IV. BACKGROUND

Pursuant to Section 31 and 43 of Republic Act No. 9136, or the Electric Power Industry Reform Act (EPIRA), and its Implementing Rules and Regulations, the ERC is mandated to implement the Retail Competition and Open Access (RCOA) allowing electricity end-users with at least the threshold level of monthly average peak demand to be in the contestable market. The EPIRA envisions that the threshold level for the contestable market shall be gradually reduced and, eventually, reach household demand level. With this, aggregators shall be allowed to supply electricity to end-users whose aggregate demand within a contiguous area meet the threshold.

The ERC Resolution No. 04, Series of 2022 designates the Central Registration Body to undertake the required processes, information technology, and other systems capable of handling customer switching and information exchange among retail electricity market participants.

The Retail Aggregation Program is conceptually similar to the RCOA that was already established through various issuances of the DOE and ERC as both are mechanisms for end-users to gain access to competitive supply.

V. THE PROPOSED RULES CHANGE

The proposed rules change aims to harmonize existing rules on retail transactions with the policies and regulations issued with respect to the implementation of the Retail Aggregation Program.

¹ ERC Resolution No. 4 Series of 2022 Rules for the Electric Retail Aggregation Program
Template version: 13 March 2020



The proposed rules change also intends to clarify procedures that will be applicable to Retail Aggregation participants for procedures not explicitly stated in ERC Resolution No. 04, Series of 2022. In relation to this, IEMOP has already sought clarification from ERC on various implementation matters through a letter dated 17 August 2022 and is awaiting ERC's response on the said letter.

The following is the summary of the proposed amendments to the WESM Rules, Retail Rules and relevant Market Manuals:

1. Updated the definition of "Supplier" to include Retail Aggregators
2. Updated the definition of "Retail Customers" to include Aggregated Group
3. Defined requirements for registration of new and registered entities wishing to participate in Retail Aggregation
4. Excluded Aggregated Members from Network Service Providers' submission of customer information with respect to end-users qualified to be Retail Customers
5. Applied same conditions, timeline and procedures for switching for Contestable Customers to Aggregated Groups
6. Specified procedures for opt-out procedures for Aggregated Members
7. Designation of a virtual metering installation as primary source of metering data for Aggregated Groups
8. Specified guidelines for aggregation of metering data to be complied with by the Retail Metering Services Providers

VI. BACKGROUND AND DESCRIPTION OF THE PROPONENT

The proponent is the Independent Electricity Market Operator of the Philippines Inc. (IEMOP), the independent market operator of the WESM.

Top Officers:

Richard J. Nethercott – President and CEO

Robinson P. Descanzo – Chief Operating Officer

Sheryll M. Dy – OIC-Head of Legal Department

Template version: 13 March 2020



Isidro E. Cacho, Jr. – Head of Corporate Strategy and Communications
Salvador D. Subaran – Head of Information Systems and Technology
Arthur P. Pintado – Internal Audit Head

VII. CONCLUSIONS AND RECOMMENDATIONS

Amendments to the WESM Rules and various Market Manuals are proposed to align procedures with the policies and regulations on the implementation of the Electric Retail Aggregation Program, namely ERC Resolution No. 084, Series of 2022. It is recommended that the proposed amendments be adopted.

VIII. REFERENCES

1. WESM Rules
2. Retail Rules
3. WESM Manual on Registration, Suspension and De-registration Criteria and Procedures Issue 12.1
4. Retail Manual on Registration Criteria and Procedures Issue 3.1
5. Retail Manual on Market Transactions Procedures Issue 3.1
6. Retail Manual on Metering Standards and Procedures Issue 5.1
7. RCC Resolution No. 2022-07
8. ERC Resolution No. 04, Series of 2022

Template version: 13 March 2020

IX. Proposed General Amendments to the WESM Rules, Retail Rules and Market Manuals on the Implementation of the Electric Retail Aggregation Program

A. WESM Rules

| WESM Rules | | | | | | | | |
|--|------------|--|--|--|--|--------------------------------------|----------------------|---------------|
| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | Proposed Amendment (in red) | Rationale | Comment | Proposed Re-wording based on Comment | Proponent's Response | RCC Agreement |
| <p><i>Please write general comments here, if any.</i></p> <p>It appears that many of the provisions proposed for amendments should be advocated before the Energy Regulatory Commission (ERC), as these are not contemplated in the existing and prevailing regulations.</p> | | | | | | | | |
| GLOSSARY | Chapter 11 | <u>Retail Customer – An electricity end-user that is qualified to contract electricity supply from Suppliers. in accordance with qualifications issued by the ERC. For avoidance of doubt, this shall refer to Contestable Customers that are allowed to participate in the Retail Competition Open Access as prescribed in the Act and/or End- Users that are allowed to participate in the Green Energy Option Program as prescribed in the</u> | <u>Retail Customer – An electricity end-user that is qualified to contract electricity supply from Suppliers. in accordance with qualifications issued by the ERC either in the capacity of a Contestable Customer, GEOP End-User or an Aggregated Group as prescribed in Republic Act No. 9513. For clarity, the term “Retail Customer” shall collectively pertain to “Contestable Customer”, “GEOP End-User” and Aggregated Group</u> | To harmonize definition of terminologies between WESM Rules and Retail Rules | For consistency, the defined terms (i.e., Retail Customer, Contestable Customer and GEOP End-User) should also be italicized similar to the term <i>Aggregated Group</i> . | | | |

| WESM Rules | | | | | | | | |
|------------|------------|--|---|--|---------|--------------------------------------|----------------------|---------------|
| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | Proposed Amendment (in red) | Rationale | Comment | Proposed Re-wording based on Comment | Proponent's Response | RCC Agreement |
| | | <u>Renewable Energy Act of 2008 (RE Law).</u> | <u>unless the context requires that the term specifically refer to either a "Contestable Customer", "GEOP End-User" or Aggregated Group. For avoidance of doubt, this shall refer to Contestable Customers that are allowed to participate in the Retail Competition Open Access as prescribed in the Act and/or End-Users that are allowed to participate in the Green Energy Option Program as prescribed in the Renewable Energy Act of 2008 (RE Law).</u> | | | | | |
| GLOSSARY | Chapter 11 | Supplier. Any person or entity licensed by the ERC to sell, broker, market or aggregate electricity to End-users, and registered with the Market Operator as a Customer under clause 2.3.2 | Supplier. Any person or entity licensed by the ERC to sell, broker, market or aggregate electricity to End-users, <u>in the capacity of a Retail Electricity Supplier. Retail Aggregator and/or Renewable Energy Supplier.</u> and | To harmonize definition of terminologies between WESM Rules and Retail Rules | | | | |

| WESM Rules | | | | | | | | |
|------------|---------|---|--|-----------|---------|--------------------------------------|----------------------|---------------|
| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | Proposed Amendment (in red) | Rationale | Comment | Proposed Re-wording based on Comment | Proponent's Response | RCC Agreement |
| | | | registered with the Market Operator as a Customer under clause 2.3.2 | | | | | |

B. WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1

| WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1 | | | | | | | | |
|--|---------|---|--|---|---|-----------------------------------|----------------------|---------------|
| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | Proposed Amendment (in red) | Rationale | Comment | Proposed wording based on Comment | Proponent's Response | RCC Agreement |
| Please write general comments here, if any. | | | | | | | | |
| Level of Participation/Direct & Indirect WESM Membership | 2.3.9 | <u>2.3.9 An entity that is mandated to register in the WESM as an Indirect WESM Member may opt to participate as a GEOP End-User.</u> | 2.1.1. 2.3.9 An entity that is mandated to register in the WESM as an Indirect WESM Member may opt to participate as a GEOP End-User. A GEOP End-User that is connected to the transmission system shall register as an Indirect WESM Member. | To clarify previously proposed Section 2.3.9 | We would like to clarify if the intent is that an end-user (either GEOP or RCOA) or aggregated group that is connected to the transmission system will have to register in the WESM as an independent member by virtue of being connected to the transmission system. Further, distribution connected end-users or aggregated groups are not required to become WESM members. | | | |
| Level of Participation/Direct & Indirect WESM Membership | (new) | (new) | <u>2.3.10 An Aggregated Group that is connected to the transmission system shall register as</u> | Aggregated Groups are not required to register in the WESM per Article VI Section 7 of the ERC Reso No. 04, | Similar to the previous comment, we would like to clarify that if the intent is that an end-user (either GEOP or | | | |

| WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1 | | | | | | | | |
|--|---------|---|--|--|---|--|----------------------|---------------|
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| | | | <u>an Indirect WESM Member.</u> | <p>Series of 2022.</p> <p>Meanwhile, grid-connected customers are required to register in the WESM pursuant to Section 2.2.4.2 of the WESM Rules.</p> <p>Limiting of WESM membership of Aggregated Groups can avoid situations where Aggregated Members are inadvertently exposed to WESM participation risks.</p> | <p>RCOA) or aggregated group that is connected to the transmission system will have to register in the WESM as an independent member by virtue of being connected to the transmission system. Further, distribution connected end-users or aggregated groups are not required to become WESM members.</p> | | | |
| REGISTRATION OF DIRECT WESM MEMBERS AND TRADING PARTICIPANTS - Customers | 2.5.9.2 | <p>2.5.9.2 Customers</p> <p>a) A person or entity that engages in the activity of purchasing electricity supplied through the <i>transmission system</i> or the <i>distribution system</i> to a connection point may register with the</p> | <p>2.5.9.2 Customers</p> <p>a) A person or entity that engages in the activity of purchasing electricity supplied through the <i>transmission system</i> or the <i>distribution system</i> to a connection point may register</p> | | <p>We propose adopting the definition of Retail Aggregator from ERC's Retail Aggregation Rules.</p> | <p>2.5.9.2 x x x</p> <ul style="list-style-type: none"> <i>Retail Aggregators</i> refers <u>a person or entity duly licensed by the ERC to engage in consolidating electric power demand of End-users for the purpose of purchasing and reselling electricity on a</u> | | |

WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1

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|-------|---------|--|---|--|---------|---|----------------------|---------------|
| | | <p><i>Market Operator as a Customer.</i></p> <p>b) The following are qualified to register as <i>Customer</i> –</p> <ul style="list-style-type: none"> ▪ Distribution Utilities, including private <i>distribution utilities</i>, <i>electric cooperatives</i> and local government utilities undertaking distribution of electricity. ▪ Retail Electricity Suppliers that have been authorized to engage in retail electricity supply by the <i>ERC</i>, <i>provided</i>, | <p>with the <i>Market Operator as a Customer.</i></p> <p>b) The following are qualified to register as <i>Customer</i> –</p> <ul style="list-style-type: none"> ▪ Distribution Utilities, including private <i>distribution utilities</i>, <i>electric cooperatives</i> and local government utilities undertaking distribution of electricity. ▪ Retail Electricity Suppliers that have been authorized to engage in retail electricity supply to | To clarify that Retail Electricity Suppliers cater specifically to Contestable Customers | | <p>group basis. to suppliers that have been authorized by the ERC to engage in consolidating electric power demand of End-Users for the purpose of purchasing</p> | | |

WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1

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|-------|---------|--|--|-----------|---------|-----------------------------------|----------------------|---------------|
| | | <p>however, that the RES may only register in the WESM upon declaration of retail competition and open access by and shall transact in the WESM and subject to relevant rules, regulations and issuances of the ERC.</p> <ul style="list-style-type: none">▪ <u>Renewable Energy Suppliers refers to suppliers that have been authorized by the ERC and DOE to engage in the provision or supply of electric power from renewabl</u> | <p><u>Contestable Customers</u> by the ERC, provided, however, that the RES may only register in the WESM upon declaration of retail competition and open access by and shall transact in the WESM and subject to relevant rules, regulations and issuances of the ERC.</p> <ul style="list-style-type: none">▪ <u>Renewable Energy Suppliers refer s to suppliers that have been authorized by the ERC and DOE to engage in the</u> | | | | | |

WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1

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|-------|---------|--|---|--|---------|---|----------------------|---------------|
| | | <p><u>e</u> <u>energy resour</u> <u>ces to End-</u> <u>Users particip</u> <u>ating in</u> <u>the Green</u> <u>Energy Option</u> <u>Program,</u> <u>provided,</u> <u>however,</u> <u>that the Rene</u> <u>wable</u> <u>Energy Suppli</u> <u>er may only</u> <u>register in</u> <u>the WESM upo</u> <u>n</u> <u>commenceme</u> <u>nt of the Green</u> <u>Energy Option</u> <u>Program.</u></p> <ul style="list-style-type: none">▪ Bulk Users or End Users that are withdrawing electricity from the <i>transmission system</i> or from the <i>distribution</i> | <p><u>provision or</u> <u>supply of</u> <u>electric power</u> <u>from renewabl</u> <u>e</u> <u>energy resour</u> <u>ces to End-</u> <u>Users particip</u> <u>ating in</u> <u>the Green</u> <u>Energy Option</u> <u>Program</u> <u>GEOP End-</u> <u>Users,</u> <u>provided,</u> <u>however,</u> <u>that the Rene</u> <u>wable</u> <u>Energy Suppli</u> <u>er may only</u> <u>register in</u> <u>the WESM upo</u> <u>n</u> <u>commenceme</u> <u>nt of the Green</u> <u>Energy Option</u> <u>Program.</u></p> <ul style="list-style-type: none">▪ Retail Aggregators <u>refers to</u> | <p>To be consistent with usage of GEOP End-Users in other provisions in Retail Rules</p> <p>Retail Aggregators are required to</p> | | | | |

WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1

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|-------|---------|--|--|---|---------|---|----------------------|---------------|
| | | system which are permitted to trade in the WESM pursuant to prevailing rules, regulations and issuances promulgated by the ERC. It is provided, however, that Bulk/End Users connected through a distribution system may only transact in the WESM upon declaration of retail competition and open access by and shall transact in the WESM and subject to | <div><div><u>suppliers that have been authorized by the ERC to engage in consolidating electric power demand of End-Users for the purpose of purchasing</u></div><div><div>▪</div><div><u>Suppliers of Last Resort refers to entities designated by the ERC to serve Retail Customers following a last resort supply event.</u></div></div><div><div>▪</div><div>Bulk Users or End Users that are withdrawing electricity from the transmission</div></div></div> | register in the WESM per Article IV Section 10 of the ERC Reso No. 04, Series of 2022 To include Suppliers of Last Resort as entities eligible to register in the WESM as Customer | | | | |

WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1

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|-------|---------|--|---|-----------|---------|-----------------------------------|-------|----------------------|---------------|
| | | relevant rules, regulations and issuances of the <i>ERC</i> . All references to the <i>Bulk</i> or <i>End Users</i> in this Manual are understood to be subject to the foregoing condition. In case of any conflict between this Manual and the provisions of relevant rules, regulations and other issuances of the <i>ERC</i> , the latter shall prevail. xxx | <i>system</i> or from the <i>distribution system</i> which are permitted to trade in the <i>WESM</i> pursuant to prevailing rules, regulations and issuances promulgated by the <i>ERC</i> . It is provided, however, that Bulk/End Users connected through a distribution system may only transact in the <i>WESM</i> upon declaration of retail competition and open access by and shall transact | | | | | | |

WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1

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|-------|---------|---|---|-----------|---------|-----------------------------------|----------------------|---------------|
| | | | in the <i>WESM</i> and subject to relevant rules, regulations and issuances of the <i>ERC</i> . All references to the <i>Bulk</i> or <i>End Users</i> in this Manual are understood to be subject to the foregoing condition. In case of any conflict between this Manual and the provisions of relevant rules, regulations and other issuances of the <i>ERC</i> , the latter shall prevail. | | | | | |
| | | | xxx | | | | | |

| WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1 | | | | | | | | |
|--|---------|--|--|--|---------|-----------------------------------|----------------------|---------------|
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| ENROLMENT AND DE-LISTING OF SUPPLY CUSTOMERS | 3.5.1.4 | 3.5.1.4 Only WESM registered <u>Retail Electricity Suppliers</u> may enroll <u>Contestable Customers</u> while only WESM registered <u>Renewable Energy Suppliers</u> may enroll <u>Retail Customers</u> under the <u>Green Energy Option Program</u> that are connected to the <u>transmission system</u> with the <u>Market Operator</u> . | <p>3.5.1.4 <u>Enrollment of Retail Customers shall comply with the following guidelines:</u></p> <p>a) Only WESM registered <u>Retail Electricity Suppliers</u> may enroll <u>Contestable Customers</u> <u>with the Market Operator</u>;</p> <p>b) <u>while only WESM registered Renewable Energy Suppliers may enroll Retail Customers under the Green Energy Option Program GEOP End-Users that are connected to the transmission system</u> with the <u>Market Operator</u>;</p> <p>c) <u>Only WESM registered Retail Aggregators may enroll Aggregated</u></p> | Restructured this section to include guidelines for enrollment of supply contracts involving Aggregated Groups | | | | |

WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1

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|-----------------------|---------|---|--|-------------------------------|---------|---|----------------------|---------------|
| | | | <u>Groups that are connected to the transmission system with the Market Operator.</u> | | | | | |
| EFFECTS OF SUSPENSION | 4.4.1 | 4.4.1. From the time of the issuance of the Notice of Suspension until such time the suspension is revoked, the suspended <i>WESM</i> member is ineligible to participate in the <i>WESM</i> . As such, the suspended <i>WESM member</i> shall be disconnected from the transmission or distribution system to which its facilities are connected. If the suspended <i>WESM</i> member is a Wholesale Aggregator, or a <i>Retail Electricity Supplier</i> <u>or</u> a <i>Renewable Energy Supplier</i> , the <i>Indirect</i> | 4.4.1 From the time of the issuance of the Notice of Suspension until such time the suspension is revoked, the suspended <i>WESM member</i> is ineligible to participate in the <i>WESM</i> . As such, the suspended <i>WESM member</i> shall be disconnected from the transmission or distribution system to which its facilities are connected. If the suspended <i>WESM member</i> is a <i>Wholesale Aggregator</i> , a <i>Retail Electricity Supplier</i> , or <u>a <i>Renewable Energy Supplier</i>, or a <i>Retail Aggregator</i></u> , the <i>Indirect WESM member</i> for whom it transacts in the <i>WESM</i> shall likewise be suspended from trading in the <i>WESM</i> and shall be disconnected from | To include Retail Aggregators | | | | |

| WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1 | | | | | | | | |
|--|---------|--|--|-------------------------------|---------|-----------------------------------|----------------------|---------------|
| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | Proposed Amendment (in red) | Rationale | Comment | Proposed wording based on Comment | Proponent's Response | RCC Agreement |
| | | WESM member for whom it transacts in the WESM shall likewise be suspended from trading in the WESM and shall be disconnected from the transmission or distribution system, unless the latter complies with the conditions set forth in Chapter II. Clause Section 2.3.7 of this Manual. | the transmission or distribution system, unless the latter complies with the conditions set forth in Chapter II. Clause Section 2.3.7 of this Manual. | | | | | |
| EFFECTS OF DEREGISTRATION | 5.6.2.2 | 5.6.2.2. If the deregistered WESM member is a Wholesale Aggregator, or a Retail Electricity Supplier or a <u>Renewable Energy Supplier</u> acting as a Direct WESM Member counterparty to an Indirect WESM member and the latter does not comply with the requirements in Chapter | 5.6.2.2 If the deregistered WESM member is a Wholesale Aggregator, or a Retail Electricity Supplier, or a Renewable Energy Supplier <u>or a Retail Aggregator</u> acting as a Direct WESM Member counterparty to an Indirect WESM member and the latter does not comply with the requirements in Chapter 4, Section 2.3.7 of this Manual, the facilities of the Indirect WESM member shall be disconnected. | To include Retail Aggregators | | | | |

| WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1 | | | | | | | | |
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| | | II, Section 2.3.7 of this Manual, the facilities of the <i>Indirect WESM member</i> shall be disconnected. | | | | | | |
| GLOSSARY OF TERMS | Appendix A | (new) | | Include definition of terminologies used in foregoing proposed amendments | | | | |
| | | Term | Definition | | | | | |
| | | <u>Aggregated Group</u> | <u>End-users, the demand of which, has been consolidated and supplied by a Retail Aggregator to qualify for contestability under current rules issued by the DOE and the ERC.</u> | | | | | |
| GLOSSARY OF TERMS | Appendix A | (new) | | Include definition of terminologies used in foregoing proposed amendments | We note that Section 3 of ERC Resolution No. 12, Series of 2020 ² requires Network Services Providers to notify qualified Contestable Customers via its monthly billing statement, in lieu of Certificates of | We respectfully suggest defining the term Contestable Customers, to wit: "An electricity end user that is certified by the ERC as having met the demand threshold for contestability as set out in the Act, <u>or is</u> | | |
| | | Term | Definition | | | | | |
| | | <u>Contestable Customers</u> | <u>An electricity end user that is certified by the ERC as having met the demand threshold for contestability as set out in the Act. Collectively, these end</u> | | | | | |

² A Resolution Prescribing the Timeline for the Implementation of the Retail Competition and Open Access (RCOA)

| WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1 | | | | | | | | | |
|--|------------|---|---|-----------------------------|---|------------------------------|--|----------------------|---------------|
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| | | | <u>users make up the contestable market.</u> | | | Contestability from the ERC. | <u>advised that it is qualified to be a contestable customer as indicated in its monthly billing statement from the Network Service Provider or such other certifications as may be allowed under applicable laws or rules.</u> Collectively, these end users make up the contestable market.” | | |
| GLOSSARY OF TERMS | Appendix A | (new) | | | Include definition of terminologies used in foregoing proposed amendments | | | | |
| | | Term | Definition | | | | | | |
| | | <u>GEOP End-User</u> | <u>Any person or entity requiring the supply and delivery of electricity sourcing 100% of its electricity requirements from renewable energy resources for its own use.</u> | | | | | | |

| WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1 | | | | | | | | |
|--|------------|---|--|---|---|---|----------------------|---------------|
| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | Proposed Amendment (in red) | Rationale | Comment | Proposed Re-wording based on Comment | Proponent's Response | RCC Agreement |
| GLOSSARY OF TERMS | Appendix A | (new) | | Include definition of terminologies used in foregoing proposed amendments | We respectfully suggest aligning the definition of Renewable Energy Suppliers with ERC's GEOP Rules | <u>“Refers to individuals or judicial entities created, registered, or authorized to operate in the Philippines in accordance with Existing laws and engaged in the provision or supply of electric Power from re resources to green energy option program (GEOP) end-user.”</u> | | |
| | | Term | Definition | | | | | |
| | | <u>Renewable Energy Supplier</u> | <u>Any person or entity authorized by the ERC and the DOE to provide or supply electric power from renewable energy resources to the GEOP End-Users and registered as a Customer pursuant to Clause 2.3.2 of the WESM Rules and Clause 2.4.1.3 of these Retail Rules.</u> | | | | | |
| | | | | | | | | |
| GLOSSARY OF TERMS | Appendix A | (new) | | Include definition of terminologies used in foregoing proposed amendments | | | | |
| | | Term | Definition | | | | | |
| | | <u>Retail Aggregator</u> | <u>A person or entity duly licensed by the ERC to engage in consolidating electric power demand of End-users for the purpose of purchasing and</u> | | | | | |
| | | | | | | | | |

| WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1 | | | | | | | | |
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| | | | <u>reselling electricity on a group basis.</u> | | | | | |
| GLOSSARY OF TERMS | Appendix A | (new) | | Include definition of terminologies used in foregoing proposed amendments | | | | |
| | | Term | Definition | | | | | |
| | | <u>Retail Customer</u> | <u>An electricity end-user that is qualified to contract electricity supply from Suppliers, in accordance with qualifications issued by the ERC either in the capacity of a Contestable Customer, GEOP End-User or an Aggregated Group as prescribed in Republic Act No. 9513. For clarity, the term “Retail Customer” shall collectively pertain to “Contestable Customer”, “GEOP End-User” and Aggregated Group unless the context</u> | | | | | |

| WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1 | | | | | | | | | | | | | |
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| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | | Proposed Amendment (in red) | Rationale | Comment | Proposed wording based on Comment | Proponent's Response | RCC Agreement | | | | |
| | | | | <u>requires that the term specifically refer to either a "Contestable Customer", "GEOP End-User" or Aggregated Group.</u> | | | | | | | | | |
| GLOSSARY OF TERMS | Appendix A | (new) <table><tr><td>Term</td><td>Definition</td></tr><tr><td><u>Retail Electricity Supplier</u></td><td><u>Any person or entity authorized by the ERC to sell, broker, market or aggregate electricity to the Contestable Customers and registered as a Customer pursuant to Clause 2.3.2 of the WESM Rules and Clause 2.4.1.2 and Clause 2.4.2.3 of these Retail Rules.</u></td></tr></table> | | | Term | Definition | <u>Retail Electricity Supplier</u> | <u>Any person or entity authorized by the ERC to sell, broker, market or aggregate electricity to the Contestable Customers and registered as a Customer pursuant to Clause 2.3.2 of the WESM Rules and Clause 2.4.1.2 and Clause 2.4.2.3 of these Retail Rules.</u> | Include definition of terminologies used in foregoing proposed amendments | | | | |
| Term | Definition | | | | | | | | | | | | |
| <u>Retail Electricity Supplier</u> | <u>Any person or entity authorized by the ERC to sell, broker, market or aggregate electricity to the Contestable Customers and registered as a Customer pursuant to Clause 2.3.2 of the WESM Rules and Clause 2.4.1.2 and Clause 2.4.2.3 of these Retail Rules.</u> | | | | | | | | | | | | |

| WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures Issue 12.1 | | | | | | | | |
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| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | Proposed Amendment (in red) | Rationale | Comment | Proposed wording based on Comment | Re-on Proponent's Response | RCC Agreement |
| | | | | | | | | |

C. Retail Rules

| Retail Rules | | | | | | | | |
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| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | Proposed Amendment (in red) | Rationale | Comments | Proposed Re-wording based on Comments | Proponent's Response | RCC Agreement |
| Please write general comments here, if any. | | | | | | | | |
| FRAMEWORK AND OBJECTIVES OF RETAIL COMPETITION AND THE RETAIL RULES | (new) | <p><u>1.3.5 Consistent with the Renewable Energy Act of 2008, the Green Energy Option Program (GEOP) promotes renewable energy by providing end-users a mechanism to source their electricity supply from renewable energy resources.</u></p> <p><u>1.3.6 Upon commencement of the Green Energy Option Program, qualified GEOP End- Users may transact with licensed and registered Renewable Energy Suppliers to participate in the GEOP.</u></p> | <p><u>1.3.5 Upon commencement of retail aggregation, aggregators shall be allowed to supply electricity to end-users whose aggregate demand within a contiguous area meets the threshold for contestability subject to compliance with the requirements under relevant rules issued by the ERC and this Rules.</u></p> <p>1.3.6 <u>1.3.5 Consistent with the Renewable Energy Act of 2008, the Green Energy Option Program (GEOP) promotes renewable energy by</u></p> | <p>To provide framework for inclusion of Retail Aggregation in the Retail Rules</p> <p>Renumbered due to insertion of new clause 1.3.5</p> | <p>For consistency with the defined terms, we suggest revising the term “aggregators” to “Retail Aggregators.”</p> <p>We also suggest that the term “Contiguous Area” be defined under the proposed amendments, based on definition under the Retail Aggregation Rules.</p> | <p>1.3.5 Upon commencement of Retail Aggregation, <u>Retail</u> Aggregators shall be allowed to supply electricity to end-users whose aggregate demand within a Contiguous Area meets the threshold for contestability subject to compliance with the requirements under relevant rules issued by the ERC and this Rules.</p> <p><u>As defined in ERC’s Retail Aggregation Rules, Contiguous Areas are areas which are within the same boundaries such as subdivisions, villages, Special Economic Zones, business districts</u></p> | | |

| Retail Rules | | | | | | | | |
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| | | | <p><u>providing end-users a mechanism to source their electricity supply from renewable energy resources.</u></p> <p>1.3.7 1.3.6 <u>Upon commencement of the Green Energy Option Program, Contestable Customers and other End-Users allowed under the Rules on Green Energy Option Program issued by the ERC may transact with Renewable Energy Suppliers to participate in the GEOP.</u></p> | Renumbered due to insertion of new clause 1.3.5 | We suggest to just state "GEOP End-users" since a Contestable Customer, in and of itself, will not be able to transact with an RE Supplier unless it is a GEOP End-user. | <p><u>and other similarly situated End-Users in which supply of electricity can be measured through metering devices.</u></p> <p>1.3.6 x x x 1.3.7 Upon commencement of the Green Energy Option Program, Contestable Customers and other <u>GEOP End-Users</u> allowed under the Rules on Green Energy Option Program issued by the ERC, may transact with Renewable Energy Suppliers to participate in the GEOP.</p> | | |
| CENTRAL REGISTRATION BODY | 1.4.1 | 1.4.1.1 The Central Registration Body shall, generally and non-restrictively, have the following functions and responsibilities: | 1.4.1.1 The Central Registration Body shall, generally and non-restrictively, have the following functions and responsibilities: | Rephrased into 1.4.1.1a) and 1.4.1.1b) and to delineate maintenance of database of | Under Section 15.1 ERC's GEOP Rules, end-users who intend to participate in GEOP are required to notify the | a) Maintain a database of end-users who have qualified to participate as Contestable Customers and | | |

| Retail Rules | | | | | | | | |
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| | | <p>a) Maintain a registry of all Retail Customers. which include Contestable Customers and GEOP End-Users who have already been awarded a certificate of contestability by the ERC. For each Retail Customer, the Central Registration Body shall indicate whether the Retail Customer is already registered with the Central Registration Body or if not, whether the Retail Customer has signified interest, through its Network Service Provider, to participate under retail competition or the Green Energy Option Program;</p> <p>b) Carry out customer switching between a Distribution</p> | <p>a) Maintain a registry of all Retail Customers, which include Contestable Customers and GEOP End-Users who have already been awarded a certificate of contestability by the ERC. For each Retail Customer, the Central Registration Body shall indicate whether the Retail Customer is already registered with the Central Registration Body or if not, whether the Retail Customer has signified interest, through its Network Service Provider, to participate under retail competition or the Green Energy Option Program;</p> <p>a) Maintain a database of end-users who have qualified to participate as Contestable Customers and GEOP end-users in</p> | qualified CCs and GEOP End-Users from maintenance of database of registered Retail Customers (CCs, GEOP End-Users, Aggregated Groups) | <p>DU of its intention at least ninety (90) calendar days prior to signing a GEOP supply contract. In contrast for RCOA, the DU is notified only through a switch request according to ERC's Rules for Customer Switching.</p> <p>Hence, the requirement for end-users to signify their interest to participate applies only to end-users who are interested to join GEOP.</p> <p>There are different rules and regulations which apply to each Retail Customer. We suggest revising this provision to reflect this.</p> <p>* * *</p> <p>May we be clarified what the term "non-restrictively" means in this context?</p> | <p>GEOP End-Users in accordance with the submission of Network Service Providers using the mode or form prescribed by the Central Registration Body. For each GEOP End-User, the Central Registration Body shall indicate whether the GEOP End-User has signified interest, through its Network Service Provider, to participate under retail competition or the Green Energy Option Program;</p> <p>xx</p> <p>h) As applicable, c)Comply with rules and regulations as may be provided by ERC.</p> | | |

| Retail Rules | | | | | | | | |
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| | | <p>Utility and a Supplier, and between Suppliers;</p> <p>c) Determine gross energy settlement quantities of Contestable Retail Customers and Suppliers;</p> <p>d) Collect and manage metering data of Contestable Retail Customers from Retail Metering Services Providers;</p> <p>e) Allocate resources to enable it to perform its functions;</p> <p>f) Provide an information exchange amongst Retail Competition Participants; and</p> <p>g) Comply with rules and regulations as may be provided by</p> | <p><u>accordance with submission of Network Service Providers using the mode or form prescribed by the Central Registration Body. For each end-user, the Central Registration Body shall indicate whether the end-user has signified interest, through its Network Service Provider, to participate under retail competition or the Green Energy Option Program;</u></p> <p>b) <u>Maintain a database of Retail Customers that have registered with the Central Registration Body;</u></p> <p>c) b) Carry out customer switching between a Distribution Utility and a Supplier, and between Suppliers;</p> <p>d) c) Determine gross energy settlement</p> | | *** | | | |

| Retail Rules | | | | | | | | |
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| | | ERC. | <p>quantities of Contestable <u>Retail</u> Customers and Suppliers;</p> <p>e) e) Collect and manage metering data of Contestable <u>Retail</u> Customers from Retail Metering Services Providers;</p> <p>f) e) Allocate resources to enable it to perform its functions;</p> <p>g) f) Provide an information exchange amongst Retail Competition Participants; and</p> <p>h) g) Comply with rules and regulations as may be provided by ERC.</p> | | | | | |
| REGISTRATION | (new) | (new) | <p>2.2.1 <u>Retail Customers refer to end-users or groups of end-users that are eligible to contract with Suppliers pursuant to applicable laws</u></p> | To make procedures that are already commonly applicable to CCs and GEOP End-Users also applicable to Aggregated Groups. | Minor revision | <p>2.2.1.3 Aggregated Groups which are eligible to contract with <i>Retail Aggregators</i>. For avoidance of doubt, <i>Aggregated Members</i>, by themselves, are not considered as Retail Customers unless</p> | | |

| Retail Rules | | | | | | | | |
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| | | | <u>and rules. These include:</u> 2.2.1.1 <u>Contestable Customers which are eligible to contract with Retail Electricity Suppliers;</u> 2.2.1.2 <u>GEOP End-Users which are eligible to contract with Renewable Energy Suppliers; and</u> 2.2.1.3 <u>Aggregated Groups which are eligible to contract with Retail Aggregators. For avoidance of doubt, Aggregated</u> | Provisions that are only applicable to Aggregated Groups shall be specified accordingly | | such <i>Aggregated Members</i> are transferred to a <i>Supplier of Last Resort</i> . | | |

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| | | | <u>Members, by themselves, are not considered as Retail Customers unless such Aggregated Member is transferred to a Supplier of Last Resort.</u> | | | | | |
| REGISTRATION | 2.2.1 | <p><u>2.2.1 Eligibility of Retail Customers</u></p> <p><u>2.2.1.1 Contestable Customers</u> - Contestability of electricity end users shall be certified by the ERC and only the end users that have been issued a certification of contestability <u>or has been certified as such under applicable laws</u></p> | <p><u>2.2.2 2.2.1 Eligibility of Retail Customers to register and transact with the Central Registration Body shall be based on the following:</u></p> <p><u>2.2.1.1 Contestable Customers</u> - Contestability of electricity end users shall be certified by the ERC and only the end users that have been issued a certification of</p> | <p>To specify eligibility requirements of Retail Customers including Aggregated Groups.</p> <p>While eligibility of End-Users to join RCOA or GEOP can be readily determined through data on average peak demand indicated in monthly bills, the same cannot be</p> | <p>Under ERC Resolution No. 12, Series of 2020, the monthly billing from the Network Service Provider (NSP) shall be considered as a proof of contestability in lieu of the Certificates of Contestability (COCs). The monthly billing statement should also be honored for the contestable customer's voluntary</p> | <p>2.2.2.1 Contestable Customers – Issuance of a certificate of contestability issued by the ERC, or monthly billing statement by the Network Service Provider indicating that the end-user has qualified to be a Contestable Customer, or such other certifications as may be allowed under applicable</p> | | |

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| | | <p>or rules may be registered and permitted to transact with the <i>Central Registration Body</i>, or, as a voluntary Participant in the WESM.</p> <p>2.2.1.2 GEOP End-Users – Electricity end-users that (a) have been identified by their respective Distribution Utilities to have met the criteria to participate in Green Energy Option Program pursuant to guidelines set by the ERC may be registered; and (b) permitted to transact with the Central Registration Body.</p> | <p>contestability or has been certified as such under applicable laws or rules may be registered and permitted to transact with the Central Registration Body, or, as a voluntary Participant in the WESM.</p> <p>2.2.1.2 GEOP End-Users – Electricity end-users that (a) have been identified by their respective Distribution Utilities to have met the criteria to participate in Green Energy Option Program pursuant to guidelines set by the ERC may be registered; and (b) permitted to transact with the Central Registration Body.</p> <p>2.2.2.1 Contestable Customers - Issuance of certificate of contestability by the ERC or monthly billing statement by the Network Service Provider indicating that the end-user has qualified to be a</p> | <p>applied to End-Users wishing to participate in Retail Aggregation as there is no prescribed demand level for an end-user to join an Aggregated Group. Thus, it proposed that the Retail Aggregator shall be the one to certify eligibility of Aggregated Groups.</p> | <p>registration in the WESM.</p> | <p>laws or rules. The foregoing certifications or monthly billing statement shall also allow the Contestable Customer to become a voluntary Participant in the WESM.</p> <p>2.2.2.2 xxx</p> <p>2.2.2.3 xxx</p> | | |

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| | | | <p><u>Contestable Customer or such other certifications as may be allowed under applicable laws or rules. The foregoing certifications shall also allow the Contestable Customer to become a voluntary Participant in the WESM.</u></p> <p><u>2.2.2.2 GEOP End-Users - Issuance of monthly billing statement by the Network Service Provider indicating that the end-user has qualified to be a GEOP End-User or such other certifications as may be allowed under applicable laws or rules.</u></p> | | | | | |

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| | | | <p><u>2.2.2.3 Aggregated Groups – Issuance of certification by the Retail Aggregator that the consolidated demand of the Aggregated Group has met the threshold for contestability and has fulfilled the criteria for aggregation within a contiguous area under applicable laws and rules.</u></p> | | | | | |
| REGISTRATION | 2.2.2 | <p>2.2.2 Distribution utilities shall notify the <i>Central Registration Body</i> of any end user that has met the requirements to be certified become a <i>Contestable Customer</i> <u>and/or a End-User under the Green Energy Option Program</u> and shall provide the</p> | <p><u>2.2.3</u> 2.2.2 Distribution utilities shall notify the <i>Central Registration Body</i> of any end user that has met the requirements to be certified become a <i>Contestable Customer</i> <u>and/or a GEOP End-User under the Green Energy Option Program</u> and shall provide the customer</p> | Renumbering and to adopt GEOP End-User consistent with usage of term in other provisions of Retail Rules and Manuals | | | | |

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| | | customer information required in Section 2.3 of this Chapter 2. Upon such notice, the Central Registration Body shall secure confirmation from the ERC if such end user has been certified as contestable and, if so certified, shall maintain a record of the customer for registration and other purposes specified in these rules. | information required in Section 2.3 of this Chapter 2. Upon such notice, the Central Registration Body shall secure confirmation from the ERC if such end user has been certified as contestable and, if so certified, shall maintain a record of the customer for registration and other purposes specified in these rules. | | | | | |
| REGISTRATION | 2.2.3 | 2.2.3 A Contestable Customer duly certified and recorded by the Central Registration Body may voluntarily: i. Elect to source its supply from a Supplier and the WESM, and register as a Direct WESM Member, in accordance with the | 2.2.42.2.3 A Contestable Customer duly certified and recorded by the Central Registration Body to be eligible to directly transact with the Central Registration Body pursuant to Section 2.2.2 of this Retail Rules may voluntarily: i. Elect to source its supply from a <u>Retail Electricity</u> Supplier | To specify that this Section is only applicable to Contestable Customers Renumbering. | | | | |

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| | | <p>procedures under Chapter 3 of these <i>Retail Rules</i>; or</p> <p>ii. Elect to source its supply from a Supplier and register with the <i>Central Registration Body</i>; or</p> <p>iii. Continue to be served by the <i>Distribution Utility</i> until it elects to purchase electricity from a <i>Supplier</i> or the <i>WESM</i>.</p> | <p>and the <i>WESM</i>, and register as a <i>Direct WESM Member</i>, in accordance with the procedures under Chapter 3 of these <i>Retail Rules</i>; or</p> <p>ii. Elect to source its supply from a <u>Retail Electricity</u> Supplier and register with the <i>Central Registration Body</i>; or</p> <p>iii. Continue to be served by the <i>Distribution Utility</i> until it elects to purchase electricity from a <u>Retail Electricity</u> Supplier or the <i>WESM</i>.</p> | | | | | |
| REGISTRATION – RETAIL CUSTOMERS | (new) | <p><u>2.2.4 A Retail Customer that is a GEOP End-User as identified and notified by their respective Distribution Utility may voluntarily:</u></p> <p>i. <u>Elect to source its supply from a Renewable Energy Supplier and register with</u></p> | <p><u>2.2.5 2.2.4 A Retail Customer that is a GEOP End-User as identified and notified by their respective Distribution Utility duly certified to be eligible to transact with the Central Registration Body pursuant to Section 2.2.2 of this Retail Rules may voluntarily:</u></p> | <p>To make wording consistent with similar clause for Contestable Customers.</p> <p>Renumbering.</p> | | | | |

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| | | <p>the <i>Central Registration Body</i> or</p> <p>ii. Continue to be served by the <i>Distribution Utility</i> until it elects to purchase electricity from a <i>Renewable Energy Supplier</i>.</p> | <p>i. <u>Elect to source its supply from a <i>Renewable Energy Supplier</i> and register with the <i>Central Registration Body</i> or</u></p> <p>ii. <u>Continue to be served by the <i>Distribution Utility</i> until it elects to purchase electricity from a <i>Renewable Energy Supplier</i>.</u></p> | | | | | |
| REGISTRATION – RETAIL CUSTOMERS | (new) | (new) | <p><u>2.2.6 An <i>Aggregated Group</i> duly certified to be eligible to transact with the <i>Central Registration Body</i> pursuant to Section 2.2.2 of this <i>Retail Rules</i> may voluntarily:</u></p> <p>a) <u>Elect to source its supply from a <i>Retail Aggregator</i> and register with the <i>Central Registration Body</i>; or</u></p> <p>b) <u>Continue to be served by the</u></p> | To clarify actions available to eligible Aggregated Groups | <p>ERC's Retail Aggregation Rules define "Aggregated Group" as "end-users, the demand of which, has been consolidated and supplied by a Retail Aggregator to qualify for contestability under current rules issued by the DOE and the ERC."</p> <p>Hence, an Aggregated Group is only considered as such when its demand is already</p> | <p>2.2.6 An <i>Aggregated Group</i> duly certified to be eligible to transact with the <i>Central Registration Body</i> pursuant to Section 2.2.2 of this <i>Retail Rules</i> may voluntarily <u>elect to source its supply from a <i>Retail Aggregator</i> and register with the <i>Central Registration Body</i>, provided that, prior to Switching,</u></p> | | |

| Retail Rules | | | | | | | | |
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| | | | <u><i>Distribution Utility until it elects to purchase electricity from a Retail Aggregator.</i></u> | | <p>consolidated and being supplied by a Retail Aggregator.</p> <p>The proposed amendment seems to provide two options for the Aggregated Group: 1.) to source from a Retail Aggregator, or 2.) to be served by a Distribution Utility.</p> <p>While the individual members are not yet switched as an Aggregated Group (and therefore, are not considered as Aggregated Members), they shall be considered as individual customers of the Distribution Utility. Notably, the Distribution Utility has no authority to serve an Aggregated Group under existing ERC regulations.</p> | <u><i>members of the Aggregated Group shall continue to be served as individual customers by the Distribution Utility until it elects to purchase electricity from a Retail Aggregator as an Aggregated Group.</i></u> | | |
| REGISTRATION – RETAIL CUSTOMERS | 2.2.4 | 2.2.5 2.2.4 The registration of <i>Contestable Customers</i> shall be in respect to their | 2.2.7 2.2.5 2.2.4 The registration of <i>Contestable Customers</i> shall be in respect | Renumbering | We note that reference to certification of | 2.2.7 The registration of <i>Contestable</i> | | |

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| | | <p>facilities that have been issued certifications of contestability by the ERC, <u>or determined as eligible by the Distribution Utility, as provided in the monthly billing statement, pursuant to relevant ERC Rules and Regulations,</u> provided, that –</p> <p>2.2.5.1 <i>Contestable Customers</i> that have more than one <i>registered facility</i> shall have multiple registrations; and</p> <p>2.2.5.2 Registration shall be in accordance with the certification of contestability issued by the <i>ERC</i> and each <i>registered facility</i> covered by one certification of contestability shall have a single and separate registration, regardless that the same is served by more than one</p> | <p>to their facilities that have been issued certifications of contestability by the ERC, <u>or determined as eligible by the Distribution Utility, as provided in the monthly billing statement, pursuant to relevant ERC Rules and Regulations,</u> provided, that –</p> <p><u>2.2.7.1</u> 2.2.5.4 <i>Contestable Customers</i> that have more than one <i>registered facility</i> shall have multiple registrations; and</p> <p><u>2.2.5.1</u> 2.2.5.2 Registration shall be in accordance with the certification of contestability issued by the <i>ERC</i> and each <i>registered facility</i> covered by one certification of contestability shall have a single and separate registration, regardless that the same is served by more than one metering installation.</p> | | <p>contestability (COCs) applies to contestable customers with prior COCs issued by ERC. We propose to align this provision with ERC Resolution No. 12 series of 2020 which states that the notification though the monthly billing statement from the Network Service Provider shall be considered as proof of contestability and the basis for the contestable customer's retail market transactions.</p> | <p><i>Customers</i> shall be <u>with</u> in respect to their facilities that have been <u>previously</u> issued certifications of contestability by the ERC, or determined as eligible by the <i>Distribution Utility</i>, as provided in the monthly billing statement <u>or Eligibility Letter from the Network Service Provider</u>, pursuant to relevant ERC Rules and Regulations, provided, that –</p> <p>xxx</p> <p>2.2.5.1 Registration shall be in accordance with the certification of contestability issued by the <i>ERC</i> <u>or the monthly billing statement or Eligibility Letter from the Network Service Provider, whichever is</u></p> | | |

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| | | metering installation. | | | | applicable , and each <i>registered facility</i> covered by one certification of contestability shall have a single and separate registration, regardless that the same is served by more than one metering installation. | | |
| REGISTRATION – RETAIL CUSTOMERS | 2.2.5 | 2.2.5 2.2.6 Contestable Customers that are directly connected to the transmission system shall be listed with the Central Registration Body based on the information from the ERC for monitoring purposes. | 2.2.8 2.2.5 2.2.6 Contestable Retail Customers that are directly connected to the transmission system shall be listed with the Central Registration Body based on the information from the ERC for monitoring purposes shall register in the WESM as required under Section 2.2.4.2 of the WESM Rules and the relevant provisions of the WESM Manual on Registration, Suspension and De-registration Criteria and Procedures. | Updated this section to make it applicable to all Retail Customers that are directly connected to transmission system and refer to applicable provisions in WESM Rules and Manuals | | | | |
| REGISTRATION – RETAIL CUSTOMER | 2.3.1.1 | 2.3.1.1 All Distribution Utilities Network Service Providers shall | 2.3.1.1 All Distribution Utilities Network Service Providers shall submit the | To clarify that of customer | Regarding Section 2.3.1.1 (i), we note that contestable customers are not | 2.3.1.1 All Network Service Providers shall submit the | | |

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| INFORMATION | | <p>submit the following information to the <i>Central Registration Body</i> on all <u>newly qualified</u> end-users within its franchise area that it deems to have already met the required demand threshold <u>to participate in retail competition and/or in the Green Energy Option Program.</u></p> <p>(a) Customer name; (b) Billing and service addresses; (c) Customers' account number; Customer contact information (telephone numbers and e-mail addresses); (e) Meter number; Meter specifications (interval metering, channels); and SEIN of the grid <i>metering point</i> of the</p> | <p>following information to the <i>Central Registration Body</i> on all <u>newly qualified</u> end users within its franchise area that it deems to have already met the required demand threshold <u>to participate in retail competition and/or in the Green Energy Option Program. as Contestable Customer and/or as GEOP End-User</u></p> <p>(a) Customer name; (b) Billing and service addresses; (c) Customers' account number; (d) Customer contact information (telephone numbers and e-mail addresses); (e) Meter number; (f) Meter specifications (interval metering, channels); (g) SEIN of the grid <i>metering point</i> of the <i>Distribution Utility</i> where the supply of the end user passes through; and</p> | <p>information under this section is only applicable to Contestable Customers and GEOP End-Users</p> <p>While eligibility of End-Users to join RCOA or GEOP can be readily determined through data on average peak demand, the same cannot be applied to End-Users wishing to participate in Retail Aggregation as there is no prescribed demand level for an end-user to join an Aggregated Group.</p> | <p>required to signify their interest in RCOA. Furthermore, the DU is only notified upon the receipt of a switch request. Only eligible GEOP customers were required to signify their interest in participating in GEOP.</p> <p>Please refer to our previous comment on section 1.4.1.</p> <p>***</p> <p>Regarding the requirement to provide the SEIN, we note that based on previous clarifications and coordination with IEMOP, the relevant requirement necessary in the report is the grid off-take metering point. <u>The SEIN is generated by IEMOP and not by the Network</u></p> | <p>following information to the <i>Central Registration Body</i> on all <u>newly qualified</u> end users within its franchise area that it deems to have already met the required demand threshold to participate as <i>Contestable Customer</i> and/or as <i>GEOP End-User</i></p> <p>(a) Customer name; (b) Billing and service addresses; (c) Customers' account number; (d) Customer contact information (telephone numbers and e-mail addresses); (e) Meter number;</p> | | |

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| | | <p><i>Distribution Utility</i> where the supply of the end user passes through; <u>Confirmation that the end-user has qualified either for retail competition or GEOP, or both; and</u></p> <p><u>(i) Confirmation that the end-user has signified interest to participate under retail competition or Green Energy Option Program, or both.</u></p> | <p>(h) Confirmation that the end-user has qualified either for retail competition or GEOP as Contestable Customer or GEOP End-User, or both; and</p> <p>(i) Confirmation that the end-user has signified interest to participate under retail competition or Green Energy Option Program as Contestable Customer or GEOP End-User, or both.</p> | | <p><u>Services Providers.</u> Hence, for clarity, it is deemed best to replace the information on item (g) to Grid Off-take Metering Point.</p> | <p>(f) Meter specifications (interval metering, channels);</p> <p>(g) SEIN of the Grid <u>Off-take</u> metering point of the <i>Distribution Utility</i> where the supply of the end user passes through; and</p> <p>(h) Confirmation that the end-user has qualified either as <i>Contestable Customer</i> or <i>GEOP End-User</i>, or both; and</p> <p>(i) <u>For end-users who will participate in GEOP:</u> Confirmation that the end-user has signified interest to participate as <u>a</u></p> | | |

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| | | | | | | Contestable Customer or GEOP End-User, or both. | | |
| REGISTRATION -SUPPLIERS AND RETAIL METERING SERVICES PROVIDERS | (new) | (new) | <p>2.4.1 <u>Suppliers refer to any person or entity authorized by the ERC to sell, broker, market or aggregate electricity to end-users. These include:</u></p> <p>a) <u>Retail Electricity Suppliers;</u></p> <p>b) <u>Renewable Energy Suppliers; and</u></p> <p>c) <u>Retail Aggregators.</u></p> | To clarify covered categories under Supplier | | | | |
| REGISTRATION -SUPPLIERS AND RETAIL METERING SERVICES PROVIDERS | 2.4.1 | <p>2.4.1 Before being able to transact for the supply of electricity to <i>Contestable Customers, Suppliers</i> shall:</p> <p>2.4.1.1 Hold a licence or authorization from the <i>ERC</i> to</p> | <p>2.4.2 2.4.1 Before being able to transact for the supply of electricity to <i>Contestable Customers, Suppliers</i> <u>intending to transact as a Retail Electricity Suppliers</u> shall:</p> | To clarify that this clause is specific to Retail Electricity Suppliers | Please delete the typo of "2.4.11.", correct the spelling to "license", and capitalize Retail Electricity Supplier as the defined term. | 2.4.1.1 Hold a license or authorization from the <i>ERC</i> to act as a Retail Electricity Supplier , and | | |

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| | | <p>act as a retail electricity <i>Supplier</i>, and Register in the <i>WESM</i> as a <i>Direct WESM Member</i> under the Customer <i>Trading Participant</i> category and shall fulfill all such registration requirements as set out in the <i>WESM Rules</i> Chapter 2.</p> | <p>2.4.1.1 2.4.11.Hold a licence or authorization from the <i>ERC</i> to act as a retail electricity <i>Supplier</i>, and</p> <p>2.4.1.2 Register in the <i>WESM</i> as a <i>Direct WESM Member</i> under the Customer <i>Trading Participant</i> category and shall fulfill all such registration requirements as set out in the <i>WESM Rules</i> Chapter 2.</p> | | | | | |
| REGISTRATION -SUPPLIERS AND RETAIL METERING SERVICES PROVIDERS | (new) | <p><u>2.4.2 Before being able to transact for the supply of electricity to <i>Retail Customers</i> under the <i>Green Energy Option Program</i>, <i>Suppliers</i> intending to transact as a <i>Renewable Energy Supplier</i> shall:</u></p> | <p>2.4.3 2.4.2 <u>Before being able to transact for the supply of electricity to <i>Retail Customers</i> under the <i>Green Energy Option Program</i>, <i>Suppliers</i> intending to transact as a <i>Renewable Energy Supplier</i> shall:</u></p> <p>2.4.3.1 2.4.2.1 <u>Secure a <i>Retail Electricity</i></u></p> | Renumbering | Since this provision is specifically for GEOP, we suggest that reference to retail customers under the Green Energy Option Program be revised to "GEOP End-User" for clarity. | 2.4.3 Before being able to transact for the supply of electricity to <u>GEOP End-Users</u> <i>Retail Customers</i> under the <i>Green Energy Option Program</i> , <i>Suppliers</i> intending to transact as a <i>the</i> <i>Renewable</i> | | |

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| | | <p><u>2.4.2.1 Secure a Retail Electricity Supplier license from the ERC pursuant ERC Resolution No. 01, Series of 2011, and amendments thereto.</u></p> <p><u>2.4.2.2 Hold a Green Energy Option Program operating permit from the DOE pursuant to DOE Department Circular No. DC 2020-04-0009 and any amendments thereto, and</u></p> <p><u>2.4.2.3 Register in the WESM as a Direct WESM Member under the Customer Trading Participant category and shall fulfil all such registration requirements as set out in the WESM Rules Chapter 2.</u></p> | <p><u>Supplier license from the ERC pursuant ERC Resolution No. 01, Series of 2011, and amendments thereto.</u></p> <p><u>2.4.3.2 2.4.2.2 Hold a Green Energy Option Program operating permit from the DOE pursuant to DOE Department Circular No. DC 2020-04-0009 and any amendments thereto, and</u></p> <p><u>2.4.3.3 2.4.2.3 Register in the WESM as a Direct WESM Member under the Customer Trading Participant category and shall fulfil all such registration requirements as set out in the WESM Rules Chapter 2.</u></p> | | | <p>Energy Supplier shall:</p> <p>xxxx</p> | | |
| REGISTRATIO | (new) | (new) | <u>2.4.4 Before being able to transact for the supply of</u> | Include provision to | Please see some | 2.4.4 Before being able to transact for | | |

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| N -SUPPLIERS AND RETAIL METERING SERVICES PROVIDERS | | | <u>electricity to Aggregated Groups, Suppliers intending to transact as a Retail Aggregator shall:</u> 2.4.4.1 <u>Hold a license or authorization from the ERC to act as a retail electricity Supplier,</u> 2.4.4.2 <u>Hold a license or authorization from the ERC to act as a Retail Aggregator, and</u> 2.4.4.3 <u>Register in the WESM as a Direct WESM Member under the Customer Trading Participant category and shall fulfil all such registration requirements as set out in the WESM Rules Chapter 2.</u> | govern registration of Retail Aggregators | minor revisions | the supply of electricity to <u>an Aggregated Groups</u> , Suppliers intending to transact as a <i>Retail Aggregator</i> shall: 2.4.4.1 Hold a license or authorization from the <i>ERC</i> to act as a <u>Retail Electricity Supplier</u> , 2.4.4.3 Register in the <i>WESM</i> as a <i>Direct WESM Member</i> under the <i>Customer Trading Participant</i> category and shall fulfil all such registration requirements as set out in the <i>WESM Rules</i> Chapter 2. | | |
| REGISTRATION -SUPPLIERS AND RETAIL | (new) | (new) | <u>2.4.5 Suppliers that are already registered in the WESM under any of the</u> | To govern registration of existing RES | | | | |

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| METERING SERVICES PROVIDERS | | | <u>categories listed under Section 2.4.1 of these Retail Rules and wishes to register in another category shall submit a separate registration application with respect to that category in accordance with registration requirements as set out in the WESM Rules Chapter 2.</u> | wishing to participate as Renewable Energy Supplier and Retail Aggregator and vice versa | | | | |
| REGISTRATION -SUPPLIERS AND RETAIL METERING SERVICES PROVIDERS | 2.4.2 | 2.4.3 2.4.2 Distribution Utilities before being able to transact for the supply of electricity to Contestable Retail Customers, as Supplier and/or Supplier of Last Resort, shall register as a Direct WESM Member in accordance with the requirements and procedures for registration set out in the WESM Rules Chapter 2 for transactions in respect to the supply of electricity to Contestable Retail Customers. | 2.4.6 2.4.3 2.4.2 Distribution Utilities before being able to transact for the supply of electricity to Contestable Retail Customers, as Supplier and/or Supplier of Last Resort, shall register as a Direct WESM Member in accordance with the requirements and procedures for registration set out in the WESM Rules Chapter 2 for transactions in respect to the supply of electricity to Contestable Retail Customers. | Renumbering | | | | |
| REGISTRATION -SUPPLIERS AND RETAIL | (new) | (new) | <u>2.4.7 Suppliers of Last Resort that are already registered in the WESM and</u> | To govern existing registration of SOLR | What are the supplemental registration | 2.4.7 Suppliers of Last Resort that are already registered in | | |

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| METERING SERVICES PROVIDERS | | | <u>already providing supply to any category of Retail Customers listed in Section 2.2.1 of this Retail Rules may also provide supply to other categories of Retail Customers subject to submission of supplemental registration requirements as may be required by relevant rules or issuances .</u> | wishing to serve other Retail Customer categories | requirements contemplated in this provision? The list of these additional requirements and the rationale or circumstance for their requirement should be explained in detail in this provision. We propose deleting the portion that has been struck through until there is a specific list of requirements and such list has been discussed with stakeholders. | the WESM and already providing supply to any category of Retail Customers listed in Section 2.2.1 of this Retail Rules may also provide supply to other categories of Retail Customers subject to submission of supplemental registration requirements as may be required by relevant rules or issuances. | | |
| REGISTRATION -SUPPLIERS AND RETAIL METERING SERVICES PROVIDERS | 2.4.3 | 2.4.3 2.4.4 Before being able to provide metering services for Contestable Retail Customers, a Retail Metering Services Provider shall: 2.4.3.1 2.4.4.1 Hold license as a Retail Metering Services Provider issued by the | 2.4.8 2.4.3 2.4.4 Before being able to provide metering services for Contestable Retail Customers, a Retail Metering Services Provider shall: 2.4.8.1 2.4.3.1 2.4.4.1 Hold license as a Retail Metering Services Provider issued by the | Renumbering | Please see some minor revisions | 2.4.8 Before being able to provide metering services for to Retail Customers, a Retail Metering Services Provider shall: 2.4.8.1 –Hold a license as a Retail Metering Services | | |

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| | | ERC; and 2.4.3.2 2.4.4.2 Register in the WESM as a <i>Retail Metering Services Provider</i> and shall fulfil all such registration requirements as set out in the WESM Rules Chapter 2 and relevant <i>Market Manual</i> . | ERC; and 2.4.8.2 2.4.3.2 2.4.4.2 Register in the WESM as a <i>Retail Metering Services Provider</i> and shall fulfil all such registration requirements as set out in the WESM Rules Chapter 2 and relevant <i>Market Manual</i> . | | | <i>Provider</i> issued by the ERC; and 2.4.8.2 Register in the WESM as a <i>Retail Metering Services Provider</i> and shall fulfill all such registration requirements as set out in the WESM Rules Chapter 2 and relevant <i>Market Manual</i> . | | |
| REGISTRATION -SUPPLIERS AND RETAIL METERING SERVICES PROVIDERS | 2.4.4 | 2.4.4 2.4.5 At the commencement of retail competition, the Distribution Utilities shall serve as the default Retail Metering Services Provider for Contestable <i>Retail</i> Customers with service addresses located within their franchise area, and as such, are deemed shall registered in the WESM without need of complying in accordance with the requirements set in Clause 2.4.3 of this | 2.4.9 2.4.4 2.4.5 At the commencement of retail competition, the Distribution Utilities shall serve as the default Retail Metering Services Provider for Contestable <i>Retail</i> Customers with service addresses located within their franchise area, and as such, are deemed shall registered in the WESM without need of complying in accordance with the requirements set in Clause 2.4.3 of this Chapter 2. The Market Operator may also | Renumbering | May we clarify what other registration requirements are being contemplated for existing RMSPs? The list of these additional requirements and the rationale or circumstance for their requirement should be explained in detail in this provision. | | | |

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| | | Chapter 2. <u>The Market Operator may also require existing Retail Metering Services Providers currently serving Contestable Customers who intends to provide service to GEOP End-Users to submit registration requirements.</u> | <u>require existing Retail Metering Services Providers currently serving Contestable Customers who intends to provide service to GEOP End-Users to submit registration requirements.</u> | | | | | |
| REGISTRATION -SUPPLIERS AND RETAIL METERING SERVICES PROVIDERS | (new) | (new) | <u>2.4.10 Retail Metering Services Providers that are already registered in the WESM and already providing metering services to any category of Retail Customers listed in Section 2.2.1 of this Retail Rules may also provide metering services to other categories of Retail Customers subject to submission of supplemental registration requirements as may be required by relevant rules or issuances.</u> | To govern registration of existing RMSPs wishing to serve other Retail Customer categories | May we clarify what other registration requirements are being contemplated for existing RMSPs? The list of these additional requirements and the rationale or circumstance for their requirement should be explained in detail in this provision. | | | |
| REGISTRATION - REGISTRATION | 2.5 | The Central Registration Body shall prepare and publish a <i>Market Manual</i> | The Central Registration Body shall prepare and publish a <i>Market Manual</i> in | To govern registration of Retail Aggregation | For confirmation on process for recognition of the | | | |

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| N PROCESS | | <p>in accordance with Chapter 8 of the <i>WESM Rules</i> which sets out:</p> <p>The requirements and procedures which Retail Electricity Suppliers, Contestable Customers and Retail Metering Services Providers shall follow to enable registration in the <i>WESM</i>, which requirements and procedures shall be consistent with relevant provisions of <i>WESM Rules</i> Chapter 2.</p> <p><u>2.5.2 The requirements and procedures which Renewable Energy Suppliers, Retail Customers and Retail Metering Services Providers shall comply with to enable registration in the WESM: and</u></p> <p>2.5.2 <u>2.5.3</u> The data</p> | <p>accordance with Chapter 8 of the <i>WESM Rules</i> which sets out:</p> <p>2.5.1 The requirements and procedures which Retail Electricity Suppliers, Retail Aggregators, Contestable Customers, Aggregated Groups and <i>Retail Metering Services Providers</i> shall follow to enable registration in the <i>WESM</i>, which requirements and procedures shall be consistent with relevant provisions of <i>WESM Rules</i> Chapter 2.</p> <p><u>2.5.2 The requirements and procedures which Renewable Energy Suppliers, Retail Customers and Retail Metering Services Providers shall comply with to enable registration in the WESM: and</u></p> | participants | <p>legal standing or personality of an Aggregated Group to register before the <i>WESM</i>. Will the Aggregated Group be required to formally organize themselves as such? Will this be tackled and laid down in the Market Manual? We propose that we consult ERC regarding the legal standing or personality of an Aggregated Group.</p> | | | |

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| | | required to be provided to the <i>Central Registration Body</i> for registration as a <i>Supplier</i> , <i>Contestable</i> <i>Retail</i> Customer, or <i>Retail Metering Services Provider</i> . | 2.5.2 2.5.3 The data required to be provided to the <i>Central Registration Body</i> for registration as a <i>Supplier</i> , <i>Contestable</i> <i>Retail</i> Customer, or <i>Retail Metering Services Provider</i> . | | | | | |
| THE MARKET – RETAIL CUSTOMER TRANSACTIONS | (new) | (new) | <u>3.2.1.6 Only a Retail Aggregator may submit a switch request to the Central Registration Body for Aggregated Groups.</u> | To clarify that Retail Aggregators shall submit switch request for Aggregated Groups | Please see some minor revisions | 3.2.1.6 Only a <i>Retail Aggregator</i> may submit a switch request to the <i>Central Registration Body</i> for <u>an</u> <i>Aggregated Groups</i> . | | |
| THE MARKET – RETAIL CUSTOMER TRANSACTIONS | (new) | (new) | <u>3.2.1.7 In transacting with Aggregated Groups, the Central Registration Body shall consider the Aggregated Group as a single entity whose transactions shall uniformly apply to all its Aggregated Members.</u> | To clarify that CRB shall transact with Aggregated Group as a single entity | Please see some minor revisions | 3.2.1.7 In transacting with <u>an</u> <i>Aggregated Groups</i> , the <i>Central Registration Body</i> shall consider the <i>Aggregated Group</i> as a single entity whose transactions shall uniformly apply to all its <i>Aggregated Members</i> . | | |
| THE MARKET – RETAIL CUSTOMER TRANSACTIONS | (new) | (new) | <u>3.2.1.8 Switching of Aggregated Members from one Aggregated Group to another shall be coordinated only among the current Retail Aggregator, prospective Retail Aggregator, as applicable,</u> | To clarify that CRB shall transact with Aggregated Group as a single entity | | | | |

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| | | | <u>the Network Service Provider and the Retail Metering Services Provider. The registration of the Aggregated Groups with the Central Registration Body shall not be affected by the switching of any of its Aggregated Member.</u> | | | | | |
| THE MARKET – RETAIL CUSTOMER TRANSACTIONS | 3.2.2.1 | <p>3.2.2.1 Once all the conditions set forth in Clause 3.2.1.3 are met, the new <i>Supplier</i> shall submit the switch request to the <i>Central Registration Body</i> not later than seven (7) working days prior to the proposed effective date.</p> <p>The switch request shall be <u>electronically filled out and shall</u> include an attestation duly signed by a <u>confirmation from authorized representatives of the following:</u></p> | <p>3.2.2.1 Once all the conditions set forth in Clause 3.2.1.3 are met, the new <i>Supplier</i> shall submit the switch request to the <i>Central Registration Body</i> not later than seven (7) working days prior to the proposed effective date.</p> <p>The switch request shall be <u>electronically filled out and shall</u> include an attestation duly signed by a <u>confirmation from authorized representatives of the following:</u></p> | | <p>Considering that issuance of the audit software certificate of the system enhancements is internal to IEMOP, it is suggested that the concerned industry participants that will be using the CRSS be given proper orientation and notification ahead of time before the commencement of electronic-based switching.</p> <p>* * *</p> <p>We note that the Aggregated Group is not a legal entity. Regarding the “appropriate documentation” that</p> | <p>In view of the need for enhancements to the Central Registration and Settlement System (CRSS) to implement the electronic-based switching, it is understood that the electronic-based switching shall take effect no later than fifteen (15) working days from the date of issuance of the audit software certificate of the system enhancements <u>and relevant market participants are given proper orientation and notification before</u></p> | | |

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| | | <p>the <i>Supplier</i> and the <i>Contestable</i> <u>Retail</u> <i>Customer</i> of the existence of a retail/<u>GEOP</u> supply contract <u>or any equivalent thereof</u> between the two parties, and the term of the retail supply contract including the effectivity dates;</p> <p>the <i>Supplier</i> or the <i>Contestable</i> <u>Retail</u> <i>Customer</i>, as applicable, and the relevant Distribution Utility <u>or Network Service Provider</u> of the existence of a valid wheeling service agreement covering the Contestable Customer;</p> <p>the <i>Supplier</i> or the <i>Contestable</i> <u>Retail</u> <i>Customer</i>, as applicable, and the registered <i>Retail Metering Services</i></p> | <p>a) the <i>Supplier</i> and the <i>Contestable</i> <u>Retail</u> <i>Customer</i> of the existence of a retail/<u>GEOP</u> supply contract <u>or any equivalent thereof</u> between the two parties, and the term of the retail supply contract including the effectivity dates;</p> <p>the <i>Supplier</i> or the <i>Contestable</i> <u>Retail</u> <i>Customer</i>, as applicable, and the relevant Distribution Utility <u>or Network Service Provider</u> of the existence of a valid wheeling service agreement covering the <i>Contestable</i> <u>Retail</u> Customer;</p> <p>the <i>Supplier</i> or the <i>Contestable</i> <u>Retail</u> <i>Customer</i>, as applicable, and the registered <i>Retail Metering Services Provider</i> of the existence of a <u>valid</u> metering services agreement covering the</p> | Generalized to Retail Customers | <p>will be required for an Aggregated Group as proof that it is the proper counterparty on behalf of its Aggregated Members, we propose that the RCC consult with ERC.</p> <p>* * *</p> <p>In the context of the Retail Rules, does “working day” refer to days of the week excluding Saturday, Sunday, and regular or non-working holidays?</p> <p>We understand that the term “business day” is defined as “any day on which the spot market is open for business” in the WESM Rules.</p> <p>* * *</p> <p>In item (a), what does "any equivalent thereof" mean?</p> | <u>the commencement of electronic-based switching.</u> | | |

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| | | <p>Provider of the existence of a valid metering services agreement covering the <i>Retail Customer</i>; and</p> <p>d) the incumbent <i>Supplier</i> or, if not served by a Supplier, the relevant <i>Distribution Utility</i> that the Contestable <i>Retail</i> Customer has no outstanding balance.</p> <p><u>The Central Registration Body may require submission of appropriate documentation to ensure the authorized representatives have authority to represent their respective organizations.</u></p> | <p><i>Retail Customer</i>; and</p> <p>d) the incumbent <i>Supplier</i> or, if not served by a Supplier, the relevant <i>Distribution Utility</i> that the Contestable <i>Retail</i> Customer has no outstanding balance.</p> <p><u>The Central Registration Body may require submission of appropriate documentation to ensure the authorized representatives have authority to represent their respective organizations.</u> <u>The Aggregated Group shall be represented by a duly authorized representative who shall sign all required documents on behalf of the Aggregated Group.</u></p> <p>The <i>Supplier</i> or the</p> | ERC Reso No. 04, Series of 2022 states that an Aggregated Group shall be treated as a single Contestable Customer. Thus, in transacting with an Aggregated Group, the CRB shall recognize only a | *** | | | |

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| | | <p>The Supplier or the Contestable Retail Customer registering as a <i>Direct WESM Member</i> shall also submit the projected metering quantities and the percentage that will be purchased from the WESM by the Contestable Retail Customer, as applicable.</p> <p>The <i>Central Registration Body</i> shall immediately evaluate the completion of the abovementioned requirements, including verification of information of the Contestable Retail Customer as submitted by the <i>Distribution Utilities</i> under Clause 2.3.1.1, and shall notify the <i>Supplier</i> and the Retail Contestable Customer, as applicable, on the status and further requirements, if any, such as prudential</p> | <p>Contestable Retail Customer registering as a <i>Direct WESM Member</i> shall also submit the projected metering quantities and the percentage that will be purchased from the WESM by the Contestable Retail Customer, as applicable.</p> <p>The <i>Central Registration Body</i> shall immediately evaluate the completion of the abovementioned requirements, including verification of information of the Contestable Retail Customer as submitted by the Distribution Utilities Network Service Providers under Clause 2.3.1.1, as applicable, and shall notify the <i>Supplier</i> and the Retail Contestable Customer, as applicable, on the status and further requirements, if any, such as prudential requirement, for the approval of switch</p> | <p>single authorized representative and apply same switching conditions that are being applied to Contestable Customers.</p> <p>To harmonize clause 3.2.2.1 with clause 2.3.1.1</p> | | | | |

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| | | <p>requirement, for the approval of switch request within two (2) working days from the receipt of the switch request. All shortcomings by the Supplier and the Contestable Retail Customer shall be rectified within two (2) working days from the receipt of the Central Registration Body's notice.</p> <p><u>In view of the need for enhancements to the Central Registration and Settlement System (CRSS) to implement the electronic-based switching. it is understood that the electronic-based switching shall take effect no later than fifteen (15) days from the date of issuance of the audit software</u></p> | <p>request within two (2) working days from the receipt of the switch request. All shortcomings by the Supplier and the Contestable Retail Customer shall be rectified within two (2) working days from the receipt of the Central Registration Body's notice.</p> <p><u>In view of the need for enhancements to the Central Registration and Settlement System (CRSS) to implement the electronic-based switching. it is understood that the electronic-based switching shall take effect no later than fifteen (15) working days from the date of issuance of the audit software certificate of the system enhancements.</u></p> | To clarify that the proposed 15 day timeframe is in working days. | | | | |

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| | | <u>certificate of the system enhancements.</u> | | | | | | |
| THE MARKET – RETAIL CUSTOMER TRANSACTIONS | 3.2.2.5 | 3.2.2.5 If the <i>Central Registration Body</i> determines under Clause 3.2.2.1 that the <i>Contestable Retail Customer</i> has lacking customer information as required under Clause 2.3.1.1, the <i>Central Registration Body</i> shall notify the relevant <i>Distribution Utility</i> within two (2) <i>working days</i> to provide the necessary information. The <i>Distribution Utility</i> shall submit the necessary information within two (2) <i>working days</i> from the receipt of the notification. | 3.2.2.5 If the <i>Central Registration Body</i> determines under Clause 3.2.2.1 that the <i>Retail Customer</i> <i>Contestable Customer or GEOP End-User</i> has lacking customer information as required under Clause 2.3.1.1, the <i>Central Registration Body</i> shall notify the relevant <i>Distribution Utility</i> <i>Network Service Provider</i> within two (2) <i>working days</i> to provide the necessary information. The <i>Distribution Utility</i> <i>Network Service Provider</i> shall submit the necessary information within two (2) <i>working days</i> from the receipt of the notification. | To harmonize clause 3.2.2.5 with clause 2.3.1.1 | | | | |
| THE MARKET – RETAIL CUSTOMER TRANSACTIONS | 3.2.2.6 | 3.2.2.6 A <i>Distribution Utility</i> as <i>Retail Metering Service Provider</i> that has received a notification from the <i>Central Registration Body</i> in | A <i>Distribution Utility</i> as <i>Retail Metering Service Provider</i> that has received a notification from the <i>Central Registration Body</i> in connection with Clause 3.2.2.5, particularly on | To clarify that 5 working days is applicable to GEOP End-Users while 15 working days is for | For clarity, we suggest revising “not a GEOP End-User” to “a Contestable Customer or an Aggregated Group” | As prescribed by ERC rules and guidelines, a <i>Distribution Utility</i> as <i>Retail Metering Service Provider</i> that | | |

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| | | connection with Clause 3.2.2.5, particularly on the standard metering requirement, shall comply with the metering requirements and submit the necessary information to the <i>Central Registration Body</i> within fifteen (15) <i>working days</i> from the receipt of the notification <u>if the <i>Retail Customer</i> is a <i>Contestable Customer</i> and within five (5) <i>working days</i> from the receipt of the notification if the <i>Retail Customer</i> is a <i>GEOP End-User</i>.</u> The <i>Central Registration Body</i> shall inform the new <i>Supplier</i> of the lacking customer information and the status of the submission of the <i>Distribution Utility</i> . Failure to submit may subject the <i>Distribution Utility</i> to appropriate sanctions. The <i>Supplier</i> shall submit updated switch effective | the standard metering requirement, shall comply with the metering requirements and submit the necessary information to the <i>Central Registration Body</i> within fifteen (15) <i>working days</i> from the receipt of the notification if the <i>Retail Customer</i> is not a <i>GEOP End-User</i> a <i>Contestable Customer</i> and within five (5) <i>working days</i> from the receipt of the notification if the <i>Retail Customer</i> is a <i>GEOP End-User</i>. The <i>Central Registration Body</i> shall inform the new <i>Supplier</i> of the lacking customer information and the status of the submission of the <i>Distribution Utility</i> . Failure to submit may subject the <i>Distribution Utility</i> to appropriate sanctions. The <i>Supplier</i> shall submit updated switch effective date, if necessary, to the <i>Central Registration Body</i> if the original switch effective date will be affected by metering installation. | Contestable Customers, Aggregated Groups and Aggregated Members switching to SOLR | <p>***</p> <p>Compliance to metering requirements may require the scheduling of service interruption on the part of the end-user. Based on ERC Resolution No. 8, Series of 2021 (section 17.2), the completion will be based on the date of execution with the end-user. Further, provisions concerning MSP services and performance should make reference to the governing ERC rules and guidelines.</p> | has received a notification from the <i>Central Registration Body</i> in connection with Clause 3.2.2.5, particularly on the standard metering requirement, shall comply with the metering requirements and submit the necessary information to the <i>Central Registration Body</i> within fifteen (15) <i>working days</i> from the receipt of the notification if the <i>Retail Customer</i> is a <i>Contestable Customer</i>, or an <i>Aggregated Group</i> not a <i>GEOP End-User</i> and within five (5) <i>working days</i> from the receipt of the notification if the <i>Retail Customer</i> is a <i>GEOP End-User</i> . For cases which require the scheduling of a service interruption on the part of the | | |

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| | | date, if necessary, to the <i>Central Registration Body</i> if the original switch effective date will be affected by metering installation. | | | | <u>end-user, the completion will be based on the agreed date of execution with the end-user.</u> The <i>Central Registration Body</i> shall inform the new <i>Supplier</i> of the lacking customer information and the status of the submission of the <i>Distribution Utility</i> . Failure to submit may subject the <i>Distribution Utility</i> to appropriate sanctions. The <i>Supplier</i> shall submit updated switch effective date, if necessary, to the <i>Central Registration Body</i> if the original switch effective date will be affected by metering installation. | | |
| THE MARKET – RETAIL CUSTOMER TRANSACTION | 3.2.5 | 3.2.5 Termination of Supplier Service by the Supplier 3.2.5.1 If the <u>Retail Electricity</u> Supplier does not intend to renew the | 3.2.5 Termination of Supplier Service to a Contestable Customer by the Retail Electricity Supplier 3.2.5.1 If the <u>Retail Electricity</u> Supplier does not | To specify that this Section covers procedures for Termination of Supplier Service to a Contestable Customer by the | Minor revisions in clause 3.2.5.2 * * * May we request clarification on the intent of this | 3.2.5.2 If the <u>Retail Electricity</u> Supplier intends to terminate the contract prior to the expiration of its term, it shall send | | |

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| | | <p>supply contract of a Retail <u>Contestable</u> Customer, it shall send a notice of non-renewal to the Retail <u>Contestable</u> Customer and the Central Registration Body at least thirty (30) days prior to the expiration of the term of the contract.</p> <p>3.2.5.2 If the Retail <u>Electricity</u> Supplier intends to terminate the contract prior to the expiration of its term, it shall send a notice of the termination to the Contestable Customer in accordance with terms specified in their contract,. and pPrior to the date of termination, <u>the Supplier shall also send the notice</u> to the Central Registration Body and to the relevant Network Service Provider and Retail Metering Services Provider.</p> | <p>intend to renew the supply contract of a Retail <u>Contestable</u> Customer, it shall send a notice of non-renewal to the Retail <u>Contestable</u> Customer and the Central Registration Body at least thirty (30) days prior to the expiration of the term of the contract.</p> <p>3.2.5.2 If the Retail <u>Electricity</u> Supplier intends to terminate the contract prior to the expiration of its term, it shall send a notice of the termination to the Contestable Customer in accordance with terms specified in their contract,. and pPrior to the date of termination, <u>the Supplier shall also send the notice</u> to the Central Registration Body and to the relevant Network Service Provider and Retail Metering Services Provider.</p> | Retail Electricity Supplier | <p>provision and basis for CRB to either give or not give effect to the termination of the Retail Supply Contract (RSC) since it is not privy to the same? From the language of provision, it appears IEMOP is regulating RSCs.</p> <p>Please also note that Clause 3.2.5.3 does pertain to conditions for termination.</p> | <p>notice of the termination to the Contestable Customer in accordance with terms specified in their contract,. and pPrior to the date of termination, <u>the Supplier shall also send the notice</u> to the Central Registration Body and to the relevant Network Service Provider and Retail Metering Services Provider.</p> | | |

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| | | <p>3.2.5.3 In case of non-renewal or termination of the supply contract, the <i>Contestable Customer</i> shall:</p> <p>i. Switch to another <i>Supplier</i> in accordance with the requirements and procedures set out in Clause 3.2.2; and</p> <p>ii. If the <i>Contestable Customer</i> is a <i>Direct WESM Member</i>, be responsible for complying with prudential requirements set out in the <i>WESM Rules</i>.</p> <p>3.2.5.4 If the <i>Contestable Customer</i> is not a <i>Direct WESM Member</i> and it fails to successfully switch to another <i>Supplier</i> prior to the expiration of the supply contract, its original <i>Supplier</i> shall:</p> <p>i. Initiate the disconnection of said <i>Contestable Customer</i> following</p> | <p>3.2.5.3 In case of non-renewal or termination of the supply contract, the <i>Contestable Customer</i> shall:</p> <p>i. Switch to another <i>Supplier</i> in accordance with the requirements and procedures set out in Clause 3.2.2; and</p> <p>ii. If the <i>Contestable Customer</i> is a <i>Direct WESM Member</i>, be responsible for complying with prudential requirements set out in the <i>WESM Rules</i>.</p> <p>3.2.5.4 If the <i>Contestable Customer</i> is not a <i>Direct WESM Member</i> and it fails to successfully switch to another <i>Supplier</i> prior to the expiration of the supply contract, its original <i>Supplier</i> shall:</p> <p>i. Initiate the disconnection of said <i>Contestable Customer</i> following prevailing rules and procedures for disconnection; and</p> | | | | | |

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| | | <p>prevailing rules and procedures for disconnection; and</p> <p>ii. Notify the <i>Central Registration Body</i> that it has initiated disconnection procedures.</p> <p>3.2.5.5 The termination of the contract shall be given effect by the <i>Central Registration Body</i> only if the conditions set forth in Clauses 3.2.5.3 of this Chapter 3 are met.</p> | <p>ii. Notify the <i>Central Registration Body</i> that it has initiated disconnection procedures.</p> <p>3.2.5.5 The termination of the contract shall be given effect by the <i>Central Registration Body</i> only if the conditions set forth in Clauses 3.2.5.3 of this Chapter 3 are met.</p> | | | | | |
| THE MARKET – RETAIL CUSTOMER TRANSACTIONS | (new) | <p><u>3.2.5.5 If the Renewable Energy Supplier does not intend to renew the GEOP Supply Contract upon its expiration, the Renewable Energy Supplier shall send a notice of non- renewal to the GEOP End-User and the Central Registration Body at least thirty (30) business days prior to the expiration of such contract. The Central</u></p> | <p><u>3.2.6 Termination of Supplier Service to a GEOP End-User by the Renewable Energy Supplier</u></p> <p><u>3.2.6.1 3.2.5.5 If the Renewable Energy Supplier does not intend to renew the GEOP Supply Contract upon its expiration, the Renewable Energy Supplier shall send a notice of non- renewal to the GEOP End-User and the Central Registration</u></p> | To specify that this Section covers procedures for Termination of Supplier Service to a GEOP End-User by the Renewable Energy Supplier | <p>To align with GEOP Rules Section 22 and to list the provisions chronologically, we suggest that clause 3.2.6.3 be placed after clause 3.2.6.4.</p> <p>Re-number clause accordingly.</p> <p>3.2.6.3 (b) The transfer to the</p> | <p>3.2.6.3 xxx</p> <p>b.) Transfer to a <i>Supplier of Last Resort</i> in accordance with requirements and procedures set in Clause 3.4; or <u>the GEOP Rules.</u></p> <p>c.) Revert to being a Captive</p> | | |

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| | | <p><u>Registration Body shall forward to the Network Service Provider the notice of non-renewal within one (1) working day from receipt thereof.</u></p> <p><u>3.2.5.6 If a GEOP End-User decides to terminate its GEOP Supply Contract with its Renewable Energy Supplier before the end of the term of the GEOP Supply Contract, the GEOP End-User shall inform the Renewable Energy Supplier and the latter shall process the termination of the GEOP Supply Contract in accordance with the termination clause of such contract. The Renewable Energy Supplier shall then submit a notice of termination to the Central Registration Body within one (1) working day from the</u></p> | <p><u>Body at least thirty (30) business days prior to the expiration of such contract. The Central Registration Body shall forward to the Network Service Provider the notice of non-renewal within one (1) working day from receipt thereof.</u></p> <p><u>3.2.6.2 3.2.5.6 If a GEOP End-User decides to terminate its GEOP Supply Contract with its Renewable Energy Supplier before the end of the term of the GEOP Supply Contract, the GEOP End-User shall inform the Renewable Energy Supplier and the latter shall process the termination of the GEOP Supply Contract in accordance with the termination clause of such contract. The Renewable Energy Supplier shall then submit a notice of termination to the Central Registration Body within one (1) working day from the</u></p> | | <p>SOLR is only upon the occurrence of any of the Last Resort Supply Events as enumerated under Section 25, Article IX of the GEOP Rules.</p> <p>For clarity, we suggest that this provision states that transfer should also be in accordance with the GEOP Rules.</p> <p>Further, reference to Clause 3.4 is incorrect, since the proposed amendment refers to Last Resort Supply Event Affecting Contestable Customers.</p> <p>3.2.6.3 (c)</p> <p>Section 24, Article VII of the GEOP Rules provide the circumstances when a GEOP End-User may revert to the</p> | <p><u>End-User in accordance with Clause 3.5. the GEOP Rules.</u></p> <p>If the Renewable Energy Supplier does not intend to renew the Green Energy Option Supply Contract upon its expiration, it shall send a Notice of Non-Renewal.</p> <p>The Network Service Provider shall also be informed of such non-renewal <u>within 30 days prior to the expiration of the GEOP supply contract.</u></p> | | |

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| | | <p><u>effectivity of the pre-termination.</u></p> <p><u>3.2.5.6 In case of non-renewal or termination of the supply contract, the GEOP End-User may</u></p> <p><u>a) Switch to another Renewable Energy Supplier in accordance with the requirements and procedures set out in Clause 3.2.2;</u></p> <p><u>b) Transfer to a Supplier of Last Resort in accordance with requirements and procedures set in Clause 3.4; or</u></p> <p><u>c) Revert to being a Captive End-User in accordance with Clause 3.5.</u></p> <p><u>If the Renewable Energy Supplier does not intend to renew the Green Energy Option</u></p> | <p><u>effectivity of the pre-termination.</u></p> <p><u>3.2.6.3 3.2.5.6 In case of non-renewal or termination of the supply contract, the GEOP End-User may</u></p> <p><u>a) Switch to another Renewable Energy Supplier in accordance with the requirements and procedures set out in Clause 3.2.2;</u></p> <p><u>b) Transfer to a Supplier of Last Resort in accordance with requirements and procedures set in Clause 3.4; or</u></p> | | <p>captive market. Reversion to captive market is also allowed if there is a pre-termination of the contract.</p> <p>For clarity, we suggest inserting that reversion to the captive market should be done in accordance with the GEOP Rules.</p> <p>Under Section 23.4, Article VII of the GEOP Rules, the notice must be sent by the GEOP End-User to the RE Supplier at least 30 calendar days before the GEOP supply contract expires. We suggest that the same period of 30 calendar days prior to expiration of the GEOP Supply Contract be observed as the period to notify the NSP, and that such period be clearly</p> | | | |

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| | | <p><u>Supply Contract upon its expiration. it shall send a Notice of Non-Renewal. The Network Service Provider shall also be informed of such non-renewal.</u></p> <p><u>3.2.5.7 The Central Registration Body shall forward the notice to the Network Service Provider within one (1) working day from receipt of the notice of termination. The Network Service Provider and Renewable Energy Supplier or GEOP End-User shall, as applicable, update or terminate the relevant wheeling services agreement covering such GEOP End-User within three (3) working days.</u></p> | <p>c) <u>Revert to being a Captive End-User in accordance with Clause 3.5.</u></p> | | <p>stated in the provision.</p> | | | |

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| | | | <p><u>If the Renewable Energy Supplier does not intend to renew the Green Energy Option Supply Contract upon its expiration, it shall send a Notice of Non-Renewal. The Network Service Provider shall also be informed of such non-renewal.</u></p> <p><u>3.2.6.4 3.2.5.7 The Central Registration Body shall</u></p> | | | | | |

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| | | | <p><u>forward the notice to the Network Service Provider within one (1) working day from receipt of the notice of termination. The Network Service Provider and Renewable Energy Supplier or GEOP End-User shall, as applicable, update or terminate the relevant wheeling services agreement covering such GEOP End-User within three (3) working days.</u></p> <p><u>3.2.6.5 The termination of the contract shall be given effect by the Central Registration Body only if the conditions set forth in Clauses 3.2.6.3 of this Chapter 3 are met.</u></p> | | | | | |
| THE MARKET – RETAIL CUSTOMER TRANSACTIONS | (new) | (new) | <p><u>3.2.7 Termination of Supplier Service to an Aggregated Group by the Retail Aggregator</u></p> | Inserted new section to cover procedures for Termination of Supplier Service to an Aggregated | Considering that this section involves various scenarios that could result in disconnection, we suggest consulting | 3.2.7.3 In case of non-renewal or termination of the supply contract, the Aggregated Group shall switch may | | |

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| | | | <p>3.2.7.1 If the <u>Retail Aggregator</u> does not intend to renew the supply contract of an <u>Aggregated Group</u>, it shall send a notice of non-renewal to the <u>Aggregated Group</u> and the <u>Central Registration Body</u> at least thirty (30) days prior to the expiration of the term of the contract.</p> <p>3.2.7.2 If the <u>Retail Aggregator</u> intends to terminate the contract prior to the expiration of its term, it shall send a notice of the termination to the <u>Aggregated Group</u> in accordance with terms specified in their contract. Prior to the date of termination, the <u>Retail Aggregator</u></p> | <p>Group by the Retail Aggregator which is patterned after the procedures for Contestable Customers</p> <p>ERC Reso No. 04, Series of 2022 states that an Aggregated Group shall be treated as a single Contestable Customer. Thus, in transacting with an Aggregated Group, the CRB shall recognize it as a single entity and apply same post-switch procedures that are being applied to Contestable Customers.</p> | <p>ERC regarding section 3.2.7.</p> <p>For 3.2.7.1, does the thirty (30) days refer to calendar or working days?</p> <p>For 3.2.7.2, what is the period contemplated for the Retail Aggregator to send a notice to the CRB, NSP, and RMSP?</p> <p>For clauses 3.2.7.3 up to 3.2.7.5, the Aggregated Group or Aggregated Member may consider other available options in accordance with existing RCOA or GEOP Rules to avoid disconnection.</p> <p>* * *</p> <p>May we qualify the intent of this provision and basis for CRB to either give or not give effect to the termination of the</p> | <p><u>consider available options, such as switching to another Retail Aggregator, switching to a Supplier of Last Resort, or reverting to the captive market as individual end-users, whichever may be allowed,</u> in accordance with the requirements and procedures set out in Clause 3.2.2 <u>of the Retail Rules and other relevant issuances of the DOE and the ERC.</u></p> <p><i>(Insert new clause)</i> <u>3.2.7.4 However, if an Aggregated Member of an Aggregated Group, who by itself is a qualified Retail Customer, will not necessarily revert to the Captive Market but shall be subjected to existing RCOA</u></p> | | |

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| | | | <p><u>shall also send the notice to the Central Registration Body and to the relevant Network Service Provider and Retail Metering Services Provider.</u></p> <p><u>3.2.7.3 In case of non-renewal or termination of the supply contract, the Aggregated Group shall switch to another Retail Aggregator in accordance with the requirements and procedures set out in Clause 3.2.2.</u></p> <p><u>3.2.7.4 If the Aggregated Group fails to successfully switch to another Retail Aggregator prior to the expiration of the supply contract, its original Retail Aggregator shall:</u></p> <p><u>i. Initiate the disconnection</u></p> | | <p>Retail Supply Contract (RSC) since it is not privy to the same? From the language of provision, it appears IEMOP is regulating RSCs.</p> <p>Please also note that Clause 3.2.7.3 does pertain to conditions for termination.</p> | <p><u>or GEOP Rules. xxx</u></p> <p><u>(Renumbering succeeding clauses)</u></p> <p><u>3.2.7.4.5 If the Aggregated Group fails to successfully switch to another Retail Aggregator, or in case its Aggregated members fail to join another Retail Aggregator, or fail to notify its intent to revert to the Captive Market or to avail SOLR service as set out in the Retail Rules, the ERC Rules for Retail Aggregation and other relevant DOE and ERC issuances, prior to the expiration of the supply contract, its original Retail Aggregator shall:</u></p> | | |

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| | | | <p>ii. <u>n of said Aggregated Group following prevailing rules and procedures for disconnection; and</u></p> <p><u>Notify the Central Registration Body that it has initiated disconnection procedures.</u></p> <p>3.2.7.5 <u>The termination of the contract shall be given effect by the Central Registration Body only if the conditions set forth in Clauses 3.2.7.3 of this Chapter 3 are met.</u></p> | | | <p>i. Initiate the disconnection of said <i>Aggregated Group</i> following prevailing rules and procedures for disconnection; and</p> <p>ii. Notify the <i>Central Registration Body</i> that it has initiated disconnection procedures.</p> <p>3.2.7.5-6 The termination of the contract shall be given effect by the <i>Central Registration Body</i> only if the conditions set forth in Clauses 3.2.7.3 of this Chapter 3 are met.</p> | | |
| THE MARKET – RETAIL | (new) | (new) | 3.2.8 <u>Termination of Supplier Service to</u> | Inserted new section to cover | For clauses 3.2.8.8 the Aggregated | 3.2.8.3 The Aggregated Member | | |

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| CUSTOMER TRANSACTIONS | | | <p>3.2.8.1 <u>an Aggregated Member by the Retail Aggregator</u></p> <p><u>In no case shall any Aggregated Member opt-out of the Aggregated Group during the term of their respective contracts, unless for valid reasons or in case of termination of its contract with its Retail Aggregator subject to Section 3.2.8.2 or 3.8.9.3 of this Retail Rules.</u></p> <p>3.2.8.2 <u>The Aggregated Member may terminate its contract with</u></p> | <p>procedures for Termination of Supplier Service to an Aggregated Group by the Retail Aggregator consistent with Article IV of ERC Reso. No. 04, Series of 2022</p> <p>Note: IEMOP has recommended to ERC that opt-out of the Aggregated Member will directly result to its reversion to the captive market without having to transfer to SOLR supply to simplify process for both the Aggregated Member, the SOLR and the CRB.</p> | <p>Member may consider other available options in accordance with existing RCOA or GEOP Rules to avoid disconnection.</p> <p>* * *</p> <p>May we ask what Section 3.8.9.3 is referring to? There is no such section in the current Retail Rules or in the proposed amendments.</p> <p>In any case, Section 4, Article IV of the Retail Aggregation Rules only provide 2 instances when an Aggregated Member can opt-out: a.) for valid reasons and b.) mutual termination.</p> <p>The reference to Section 3.4.3.1 is inaccurate, since this section only lists last resort supply events, whereas the</p> | <p>shall have the right to terminate its contract when the Retail Aggregator commits any <u>of the</u> acts of default as listed in Section 3.4.3.1 and Section 3.4.4.1 of this Retail Rules <u>is committed.</u></p> <p><u>3.2.8.8 However, if an Aggregated Member, who by itself is a qualified Retail Customer, will not necessarily revert to the Captive Market but shall be subjected to existing RCOA or GEOP Rules. xxx</u></p> | | |

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| | | | <p><u>the Retail Aggregator subject to the parties' mutual agreement and in accordance with the terms of their respective contract.</u></p> <p>3.2.8.3 <u>The Aggregated Member shall have the right to terminate its contract when the Retail Aggregator commits any act of default as listed in Section 3.4.3.1 and Section 3.4.4.1 of this Retail Rules.</u></p> | | <p>provision speaks of “acts of default” of the Retail Aggregator.</p> <p>The non-exhaustive list of acts of default when the Aggregated Member shall have the right to terminate are listed in Section 6, Article IV of the Retail Aggregation Rules, which include LRSEs, but also enumerates other circumstances as well. Thus, we suggest that a separate section be introduced stating the non-exhaustive enumeration of the acts of default in Section 6, Article IV of the Retail Aggregation Rules.</p> <p>The reference to Section 3.4.4.1 is also incorrect. As to Section 3.4.4.1, the proposed amendment</p> | | | |

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| | | | <p>3.2.8.4</p> <p><u>The Aggregated Member shall inform its Retail Aggregator no later than thirty (30) days prior to the intended opt-out period, in order for it to contract with a new Retail Aggregator pursuant to Section 3.2.1.8 of this Retail Rules or to be allowed to revert to being a Captive End-User pursuant to procedures</u></p> | | <p>introduces Last Resort Supply Events which are not contemplated and enumerated in ERC Resolution No. 35, Series of 2006. Thus, Section 3.4.4.1 should be corrected (Please see our comment in Section 3.4.4.1).</p> <p>While the proposed immediate reversion to captive service without transferring first to SoLR service may simplify the process for the Aggregated Member, the SOLR and the CRB, such unplanned and potentially large volume transfers may increase generation costs for all of the DU's captive customers and not just the reverting customer. This is because captive supply regulations prescribe</p> | | | |

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| | | | <p>3.2.8.5</p> <p><u>under Section 3.5 of this Retail Rules.</u></p> <p><u>If the notification was made less than thirty (30) days, the Aggregated Member shall be served by a Supplier of Last Resort for a maximum period of ninety (90) days pursuant to procedures under Section 3.4 of this Retail Rules.</u></p> <p><u>The said Aggregated</u></p> | | <p>that the DU's supply portfolio should not have excess supply or over-contracted capacity. A sudden increase of energy purchases due to the unexpected reversion of a customer to the captive market may require the DU to purchase more expensive spot energy or enter into a Power Supply Agreement under unfavorable conditions. The costs of these purchases to accommodate the sudden return of a customer to the captive market will eventually be borne by <i>all captive customers</i> and not solely by the reverting customer.</p> <p>Having a mechanism for the reverting customer to remain with the SoLR temporarily will</p> | | | |

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| | | | <p><u>Member shall be automatically reverted to the Captive Market at the end of such period unless the said Member has opted to join an Aggregated Group, pursuant to procedures under Section 3.2.1.8 of this Retail Rules, within the said period of time.</u></p> <p>3.2.8.6 <u>Within five (5) days from receipt of Notice from the</u></p> | | provide the DU time to procure the necessary supply to augment its portfolio at reasonable costs. Further, the captive customers of the DU are shielded from the volatility of the spot market and costs of short-term bridging supply. | | | |

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| | | | <u>Aggregated Member, the Retail Aggregator shall notify the Central Registration Body, the concerned Network Service Provider and the Supplier of Last Resort, as applicable, that such Aggregated Member has given notice that it has opted-out or terminated its contract with</u> | | | | | |

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| | | | <u>the concerned Retail Aggregator. If the reason for opting out is due to act of default which results in the termination of all the contracts with the Aggregated Members in the Aggregated Group, each Aggregated Member shall be notified by the Retail Aggregator of the termination of the retail</u> | | | | | |

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| | | | 3.2.8.7 <u>supply contract, within five (5) days from the first notice of the Aggregated Member. Should an opt-out of an Aggregated Member result in the demand of the Aggregated Group falling below the required threshold level, the status of contestability shall not be</u> | | | | | |

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| | | | <u>affected unless it is discovered that the formation of the Aggregated Group and/or the corresponding changes in membership are attended by fraud or deceit. The status of contestability shall remain only during the term of the original contract/s. After which, the Retail</u> | | | | | |

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| | | | <u>Aggregator shall initiate the reversion of the Aggregated Group to the captive market pursuant to procedures under Section 3.5 of this Retail Rules.</u> | | | | | |
| THE MARKET – RETAIL CUSTOMER TRANSACTIONS | 3.2.6 | 3.2.6 The Central Registration Body shall prepare and publish a relevant Market Manual that sets out in more detail the relevant timelines, requirements and procedures for carrying out the Contestable Retail Customer transactions described in this section 3.2. | 3.2.9-3.2.6 The Central Registration Body shall prepare and publish a relevant Market Manual that sets out in more detail the relevant timelines, requirements and procedures for carrying out the Contestable Retail Customer transactions described in this section 3.2. | Renumbering | | | | |
| THE MARKET – PROCEDURES | 3.4 | A Contestable Retail Customer shall be transferred to the Supplier | <u>3.4.1 Last Resort Supply Events Affecting Contestable Customers</u> | Disaggregated Section 4 to have subsection for each | <u>General Comment:</u> Providing SOLR service requires the | 3.4.1.2 When the Central Registration Body | | |

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| UPON OCCURRENCE OF LAST RESORT EVENTS | | <p>of Last Resort upon occurrence of any one of the following last resort events:</p> <p>3.4.1.1 The Supplier has ceased to operate;</p> <p>2 The Supplier's license or authorization has been revoked by the ERC;</p> <p>3 The Supplier's operating permit, in the case of a Renewable Energy Supplier, has been revoked by the DOE;</p> <p>3.4.1.3 <u>3.4.1.4</u> The Supplier is no longer permitted to trade in the WESM due to suspension, deregistration or cessation of membership; or</p> <p>3.4.1.5 Failure to renew the supply contract between a GEOP End-User and a Renewable Energy Supplier;</p> | <p>3.4.1.1 A Contestable Retail <u>Contestable</u> Customer shall be transferred to the Supplier of Last Resort upon occurrence of any one of the following last resort events:</p> <p>a) 3.4.1.1 <u>a) 3.4.1.1</u> The Retail Electricity <u>Retail Electricity</u> Supplier has ceased to operate;</p> <p>b) 3.4.1.2 <u>b) 3.4.1.2</u> The Retail Electricity <u>Retail Electricity</u> Supplier's license or authorization has been revoked by the ERC;</p> <p>3.4.1.3 The Supplier's operating permit, in the case of a Renewable Energy Supplier, has been revoked by the DOE;</p> <p>c) 3.4.1.3 <u>c) 3.4.1.4</u> The Supplier is no longer permitted to trade in the WESM due to suspension, deregistration or cessation of membership; or</p> <p>3.4.1.5 Failure to renew the supply contract between a GEOP End-User and a Renewable Energy Supplier;</p> | <p>type of Retail Customer.</p> <p>This subsection covers procedures for transfer to SOLR of Contestable Customers</p> | <p>SOLR and the contestable customer to (i) sign a SOLR contract and (ii) process the payment of Bill Deposit. Given this, we suggest that there be at least a thirty (30) day notice prior to SOLR contract effectivity date.</p> <p>* * *</p> <p>3.4.1.2 Minor revision</p> <p>* * *</p> <p>3.4.1.3 Under 3.4.1.3 item (c), we suggest that the SOLR procedures for Retail Customers be reviewed <u>be</u> to consider timeline in (i) processing and settlement of deposit, and (ii) facilitation of signed and notarized SOLR contract. Hence, we propose that</p> | <p>determines or receives notice of the occurrence of a last resort event, it <u>the</u> shall notify the affected <u>Contestable</u> Customers, the Supplier of Last Resort, and the defaulting Supplier if practicable, of the occurrence and the effective date of the transfer of the <u>Contestable</u> Customers to the Supplier of Last Resort.</p> <p>* * *</p> <p>c) <u>Once all parties agree, the</u> parties shall then notify the Central Registration Body that the <u>Contestable</u> Customer has agreed to be</p> | | |

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| | | <p>3.4.1.4 3.4.1.6 The agreements for transmission, wheeling or distribution services with the relevant Network Service Provider or Distribution Utility have been terminated.; or</p> <p>3.4.1.7 Any other event which the ERC may deem as a last resort supply event.</p> <p>3.4.2 When the Central Registration Body determines <u>or receives notice of</u> the occurrence of a last resort event, the shall notify the affected Contestable Retail Customers, the Supplier of Last Resort, and the defaulting Supplier if practicable, of the occurrence and the effective date of the transfer of the Contestable Retail Customers to the Supplier of Last Resort.</p> | <p>d) 3.4.1.4 3.4.1.6 The agreements for transmission, wheeling or distribution services with the relevant Network Service Provider or Distribution Utility have been terminated.; or</p> <p>e) 3.4.1.7 Any other event which the ERC may deem as a last resort supply event.</p> <p>3.4.1.2 When the Central Registration Body determines <u>or receives notice of</u> the occurrence of a last resort event, the shall notify the affected Contestable Retail Customers, the Supplier of Last Resort, and the defaulting Supplier if practicable, of the occurrence and the effective date of the transfer of the Contestable Retail Customers to the Supplier of Last Resort.</p> <p>3.4.1.3 The following</p> | | <p>submittal of switch request form be accomplished once all parties agree which may happen beyond the two (2) working days notice to CRB.</p> | <p>served by the Supplier of Last Resort no later than two (2) working days after being notified of the occurrence of the last resort event. The SOLR shall submit to the Central Registration Body an accomplished switch request form and submit a switch request in accordance with applicable requirements and procedures under Sections 3.2.1 and 3.2.2 of this <i>Retail Rules</i>.</p> | | |

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| | | <p>3.4.3 The following procedures shall be observed upon the occurrence of a last resort event:</p> <p>1 Within twenty-four hours two (2) working days from being notified of the occurrence of the last resort event, the Contestable Retail Customer shall notify the Central Registration Body and the Supplier of Last Resort if it chooses to be served by the latter.</p> <p>2 Within twenty-four hours two (2) working days upon receiving notice from the Contestable Retail Customer, the Supplier of Last Resort shall inform the Contestable Customer of the terms of its supply contract and the applicable rates.</p> | <p>procedures shall be observed upon the occurrence of a last resort event:</p> <p>a) 3.4.3.1 Within twenty-four hours two (2) working days from being notified of the occurrence of the last resort event, the Contestable Retail Contestable Customer shall notify the Central Registration Body and the Supplier of Last Resort if it chooses to be served by the latter.</p> <p>b) 3.4.3.2 Within twenty-four hours two (2) working days upon receiving notice from the Contestable Retail Contestable Customer, the Supplier of Last Resort shall inform the Contestable Customer of the terms of its supply contract and the applicable rates.</p> <p>c) 3.4.3.3 The parties shall</p> | | | | | |

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| | | <p>3.4.3.3 The parties shall then notify the Central Registration Body that the Contestable <u>Retail Customer</u> has agreed to be served by the Supplier of Last Resort no later than forty-eight (48) hours <u>two (2) working days</u> after being notified of the occurrence of the last resort event and submit an attestation of the agreement duly signed by the Contestable Customer and the Supplier of Last Resort <u>a switch request in accordance with applicable requirements and procedures under Sections 3.2.1 and 3.2.2 of this Retail Rules.</u></p> <p><u>3.4.3.4 Upon evaluation, the Central Registration Body shall either approve or disapprove the switch request in accordance</u></p> | <p>then notify the Central Registration Body that the Contestable <u>Retail Contestable</u> Customer has agreed to be served by the Supplier of Last Resort no later than forty-eight (48) hours <u>two (2) working days</u> after <u>being notified of the occurrence of the last resort event and submit</u> being notified of the occurrence of the last resort event and submit an attestation of the agreement duly signed by the Contestable Customer and the Supplier of Last Resort <u>a switch request in accordance with applicable requirements and procedures under Sections 3.2.1 and 3.2.2 of this Retail Rules.</u></p> <p><u>d) 3.4.3.4 Upon evaluation, the Central Registration Body shall either approve or disapprove the switch request in accordance</u></p> | | | | | |

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| | | <p><u>with procedures under Clauses 3.2.2 of this Retail Rules.</u></p> <p>3.4.4 Within twenty-four hours upon being notified of the last resort event, a <i>Contestable Customer</i> that is a <i>Direct WESM Member</i> –</p> <p>3.4.4.1 If it chooses to be served by the <i>Supplier of Last Resort</i>, shall take the necessary actions as set out in clause 3.4.3; or</p> <p>3.4.4.2 If it chooses not to be served by the <i>Supplier of Last Resort</i>, shall submit additional securities required by the <i>Market Operator</i> as necessary to fully satisfy the</p> | <p><u>with procedures under Clauses 3.2.2 of this Retail Rules.</u></p> <p>3.4.1.4 Within twenty-four hours upon being notified of the last resort event, a <i>Contestable Customer</i> that is a <i>Direct WESM Member</i> –</p> <p>a) 3.4.4.1 If it chooses to be served by the <i>Supplier of Last Resort</i>, shall take the necessary actions as set out in clause 3.4.3; or</p> <p>b) 3.4.4.2 If it chooses not to be served by the <i>Supplier of Last Resort</i>, shall submit additional securities required by the <i>Market Operator</i> as necessary to fully satisfy the prudential requirements set out in the <i>WESM Rules</i>.</p> | | | | | |

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| | | <p>prudential requirements set out in the <i>WESM Rules</i>.</p> <p>3.4.5 Disconnection of the <i>Contestable Customer</i> affected by a last resort event shall be initiated in accordance with prevailing rules and regulations on disconnection under the following conditions –</p> <p>3.4.5.1 At the instance of the <i>Central Registration Body</i> if the <i>Contestable Customer</i> that elected to be served by a <i>Supplier of Last Resort</i> -</p> <p>i. Fails to give notice within the period set out in clause 3.4.3.1; or</p> | <p>3.4.1.5 Disconnection of the <i>Contestable Customer</i> affected by a last resort event shall be initiated in accordance with prevailing rules and regulations on disconnection under the following conditions –</p> <p>3.4.1.5.1 At the instance of the <i>Central Registration Body</i> if the <i>Contestable Customer</i> that elected to be served by a <i>Supplier of Last Resort</i> -</p> <p>i. Fails to give notice within the period set out in clause 3.4.3.13.a; or</p> <p>ii. Provides notice that it elects not to be transferred to a <i>Supplier of Last Resort</i> within the period set out in clause 3.4.3.13.a; or</p> <p>iii. fails to enter into contract with the</p> | | | | | |

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| | | <p>ii. Provides notice that it elects not to be transferred to a <i>Supplier of Last Resort</i> within the period set out in clause 3.4.3.1; or</p> <p>iii. fails to enter into contract with the <i>Supplier of Last Resort</i>; or</p> <p>iv. Fails to serve notice within the period set out in clause 3.4.3.1.</p> <p>3.4.5.2 In accordance with the conditions and procedures set out in <i>WESM Rules</i> section 3.15 and relevant <i>WESM</i> manual on suspension or deregistration of the <i>Direct WESM Member Contestable Customer</i> that elects not to be served by a <i>Supplier of Last Resort</i> fails to satisfy the prudential</p> | <p><i>Supplier of Last Resort</i>; or</p> <p>iv. Fails to serve notice within the period set out in clause 3.4. 3.4.1.3.c.</p> <p>3.4.1.6 The disconnection shall be carried out by the relevant Distribution Utility or Network Service Provider upon receipt of notice of disconnection served by the Central Registration Body in accordance with the procedures and timeline set out in relevant rules and regulations on disconnection of Contestable <i>Retail Contestable</i> Customers.</p> | | | | | |

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| | | <p>requirements set by the <i>Market Operator</i>.</p> <p>3.4.6 The disconnection shall be carried out by the relevant Distribution Utility or Network Service Provider upon receipt of notice of disconnection served by the Central Registration Body in accordance with the procedures and timeline set out in relevant rules and regulations on disconnection of Contestable <i>Retail</i> Customers.</p> | | | | | | |
| THE MARKET – PROCEDURES UPON OCCURRENCE OF LAST RESORT EVENTS | (new) | <p><u>3.4.8 GEOP End-Users which opt not to avail or fail to transfer to a Supplier of Last Resort within the timelines prescribed in Clause 3.4.3 shall revert to being a Captive End-user, subject to conditions and procedures under</u></p> | <p><u>3.4.2 Last Resort Supply Events Affecting GEOP End-Users</u></p> <p><u>3.4.2.1 A GEOP End-User shall be transferred to the Supplier of Last Resort upon occurrence of any one of the following last resort events:</u></p> | <p>Disaggregated Section 4 to have subsection for each type of Retail Customer.</p> <p>This subsection covers procedures for transfer to SOLR of GEOP End-Users</p> | <p><u>General Comment:</u> Providing SOLR service requires the SOLR and the contestable customer to (i) sign a SOLR contract and (ii) process the payment of Bill Deposit. Given this, we suggest that there be at least a</p> | <p>3.4.2.3 x x xc) <u>Once all parties agree,</u> the parties shall then notify the Central Registration Body that the <i>GEOP End-User</i> has agreed to be served by the Supplier of Last</p> | | |

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| | | <u>Section 3.5.</u> | <p>a) <u>The Renewable Energy Supplier has ceased to operate;</u></p> <p>b) <u>The Renewable Energy Supplier's license or authorization has expired or has been revoked by the ERC;</u></p> <p>c) <u>The Renewable Energy Supplier's operating permit has been revoked by the DOE;</u></p> <p>d) <u>The Renewable Energy Supplier is no longer permitted to trade in the WESM due to suspension, deregistration or cessation of membership;</u></p> <p>e) <u>Failure to renew the supply contract between a GEOP End-User and a Renewable Energy Supplier;</u></p> <p>f) <u>The agreements for transmission, wheeling or distribution services with the relevant Network Service</u></p> | | <p>thirty (30) day notice prior to SOLR contract effectivity date.</p> <p>* * *</p> <p>Under clause 3.4.2.3 item (c), we suggest that the SOLR procedures for Retail Customers <u>be reviewed</u> to consider timeline in (i) processing and settlement of deposit, and (ii) facilitation of signed and notarized SOLR contract. Hence, we propose that submittal of switch request form be accomplished once all parties agree which may happen beyond the two (2) working days notice to CRB.</p> <p>Under Clause 3.4.2.4, may we clarify our understanding that the GEOP Rules Section 24.1(d) and</p> | <p>Resort no later than two (2) working days after being notified of the occurrence of the last resort event. <u>The SOLR shall submit to the Central Registration Body an accomplished switch request form and submit a switch request</u> in accordance with applicable requirements and procedures under Sections 3.2.1 and 3.2.2 of this <i>Retail Rules</i>.</p> | | |

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| | | | <p><u>Provider or Distribution Utility have been terminated, or</u></p> <p>g) <u>Any other event which the ERC may deem as a last resort supply event.</u></p> <p>3.4.2.2 <u>When the Central Registration Body receives notice of or determines the occurrence of a last resort event, it shall notify the affected GEOP End-User, the Supplier of Last Resort, and the defaulting Renewable Energy Supplier if practicable, of the occurrence and the effective date of the transfer of the GEOP End-User to the Supplier of Last Resort.</u></p> <p>3.4.2.3 <u>The following procedures shall be observed upon the</u></p> | | (e) provides that the End-user must avail SOLR service first and exceeds the maximum allowed period, prior to reverting to captive market. | | | |

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| | | | <u>occurrence of a last resort event:</u> a) <u>Within two (2) working days from being notified of the occurrence of the last resort event, the GEOP End-User shall notify the Central Registration Body and the Supplier of Last Resort if it chooses to be served by the latter.</u> b) <u>Within two (2) working days upon receiving notice from the GEOP End-User, the Supplier of Last Resort shall inform the GEOP End-User of the terms of its supply contract and the applicable rates.</u> c) <u>The parties shall then notify the Central Registration Body that the GEOP End-User has agreed to be served by the Supplier of Last Resort no later than two (2) working days after being</u> | | | | | |

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| | | | <p><u>notified of the occurrence of the last resort event and submit a switch request in accordance with applicable requirements and procedures under Sections 3.2.1 and 3.2.2 of this <i>Retail Rules</i>.</u></p> <p>d) <u>Upon evaluation, the <i>Central Registration Body</i> shall either approve or disapprove the switch request in accordance with procedures under Clauses 3.2.2 of this <i>Retail Rules</i>.</u></p> <p><u>3.4.2.4—3.4.8 <i>GEOP End-Users</i> which opt not to avail or fail to transfer to a <i>Supplier of Last Resort</i> within the timelines prescribed in Clause 3.4.32 shall revert to being a Captive End-user, subject to conditions and procedures under Section 3.5.</u></p> | | | | | |

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| THE MARKET – PROCEDURES UPON OCCURRENCE OF LAST RESORT EVENTS | (new) | (new) | <p>3.4.3 <u>Last Resort Supply Events Affecting Aggregated Groups</u></p> <p>3.4.3.1 <u>An Aggregated Group shall be transferred to the Supplier of Last Resort upon occurrence of any one of the following last resort events:</u></p> <p>a) <u>The Retail Aggregator has ceased to operate;</u></p> <p>b) <u>The Retail Aggregator's license or authorization has been revoked by the ERC;</u></p> <p>c) <u>The Retail Aggregator is no longer permitted to trade in the WESM due to suspension, deregistration</u></p> | <p>Disaggregated Section 4 to have subsection for each type of Retail Customer.</p> <p>This subsection covers procedures for transfer to SOLR of Aggregated Groups which is patterned after the procedures for Contestable Customers</p> <p>ERC Reso No. 04, Series of 2022 states that an Aggregated Group shall be treated as a single Contestable Customer. Thus, in transacting with an Aggregated Group, the CRB shall recognize it as a single entity and apply same post-switch procedures that are being applied to Contestable</p> | <p>According to ERC's Retail Aggregation Rules, the Aggregated Member may be served by the SOLR for a maximum period of ninety (90) days, unless it becomes a member of another Aggregated Group or it reverts to the Captive Market. Meanwhile, the contestability of an Aggregated Group shall remain only during the term of the original contract(s). (RA Rules Art IV, Sections 4 and 9).</p> <p>May we ask if the CRB sought clarification with ERC if this means that only individual Aggregated Members can transfer to a SOLR and not the entire Aggregated Group?</p> <p>We suggest that this</p> | <p>3.4.3.2 (a). When an Aggregated Member, in accordance with Section 3.2.8.4, informs its intent to opt-out due to last resort events, <u>or should the act of default result in the termination of all the contracts with the Aggregated Group,</u> affecting all Aggregated Members in the Aggregated Group as listed in Section 3.4.3.1. Each Aggregated Member shall be notified by the Retail Aggregator of the termination of the supply contract, within five (5) days from the first notice of the Aggregated Member.</p> <p>3.4.3.3 x x x c) <u>Once all parties agree.</u></p> | | |

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| | | | <p><u>or cessation of membership;</u></p> <p>d) <u>The agreements for transmission, wheeling or distribution services with the relevant Network Service Provider or Distribution Utility have been terminated, or</u></p> <p>e) <u>Excess billing of the contracted electricity rate by the Retail Aggregator unless measures were immediately taken by the Retail Aggregator upon discovery of error;</u></p> <p>f) <u>Non-payment of Retail Aggregator on its obligation to the DU,</u></p> | <p>Customers.</p> <p>Included additional last resort supply events pursuant to Article IV Section 6 of the ERC Rules</p> | <p>clause be aligned with the Retail Aggregation Rules.</p> <p>* * *</p> <p><u>General Comment:</u> Providing SOLR service requires the SOLR and the contestable customer to (i) sign a SOLR contract and (ii) process the payment of Bill Deposit. Given this, we suggest that there be at least a thirty (30) day notice prior to SOLR contract effectiveness date.</p> <p>* * *</p> <p>May we ask for a detailed procedure and timetable for the CRB to send notices to the Aggregated Group and SOLR? In the GEOP Rules, the CRB shall send notices within one business day of the effective date of its transfer to SOLR.</p> | <p>the parties shall then notify the Central Registration Body that the <i>GEOP End-User</i> has agreed to be served by the Supplier of Last Resort no later than two (2) working days after being notified of the occurrence of the last resort event. <u>The SOLR shall submit to the Central Registration Body an accomplished switch request form and submit a switch request</u> in accordance with applicable requirements and procedures under Sections 3.2.1 and 3.2.2 of this <i>Retail Rules</i>. <u>For</u></p> | | |

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| | | | <p><u>Generation Company and WESM, among others;</u></p> <p>g) <u>Final Decision issued by any Court in the Philippines convicting the Retail Aggregator of any crime or offense involving fraud or deceit;</u></p> <p>h) <u>Any other event which the ERC may deem as a last resort supply event.</u></p> <p>3.4.3.2 <u>The transfer to Supplier of Last Resort may be initiated through the following scenarios:</u></p> <p>a) <u>When an Aggregated</u></p> | Conditions for transfer to SOLR included pursuant to Article IV Section 8 of the ERC Reso No. 04, Series of 2022 | (Section 26.3.a). This is to align with foregoing clause 3.4.3.2 (b) that CRB shall notify affected Aggregate Group. | <u>the avoidance of doubt, in the event that all members of an Aggregated Group switch to SOLR, the SOLR shall serve each end-user member of the Aggregated Group as an individual customer.</u> | | |

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| | | | <u>Member, in accordance with Section 3.2.8.4, informs its intent to opt-out due to last resort events affecting all Aggregated Members in the Aggregated Group as listed in Section 3.4.3.1. Each Aggregated Member shall be notified by the Retail Aggregator of the termination of the supply contract, within five (5) days from the first notice of</u> | | | | | |

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| | | | <u>the Aggregated Member.</u> b) <u>When the Central Registration Body receives notice of or determines the occurrence of a last resort event as listed in Section 3.4.3.1. The Central Registration Body shall notify the affected Aggregated Group, the Supplier of Last Resort, and the defaulting Retail Aggregator, if practicable, of</u> | | | | | |

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| | | | <p><u>the occurrence and the effective date of the transfer of the Aggregated Group to the Supplier of Last Resort.</u></p> <p>3.4.3.3 <u>The following procedures shall be observed upon the occurrence of a last resort event:</u></p> <p>a) <u>Within two (2) working days from being notified of the occurrence of the last resort event, the Aggregated Group shall notify the Central Registration Body and the</u></p> | | | | | |

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| | | | <p><u>Supplier of Last Resort</u> if it chooses to be served by the latter.</p> <p>b) <u>Within two (2) working days upon receiving notice from the Aggregated Group, the Supplier of Last Resort shall inform the Aggregated Group of the terms of its supply contract and the applicable rates.</u></p> <p>c) <u>The parties shall then notify the Central Registration Body that the Aggregated Group has agreed to be served by the Supplier of Last Resort no later</u></p> | | | | | |

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| | | | <p><u>than two (2) working days after being notified of the occurrence of the last resort event and submit a switch request in accordance with applicable requirements and procedures under Sections 3.2.1 and 3.2.2 of this Retail Rules.</u></p> <p>d) <u>Upon evaluation, the Central Registration Body shall either approve or disapprove the switch request in accordance with procedures under Clauses 3.2.2 of this Retail Rules.</u></p> <p>3.4.3.4 <u>Disconnection of the Aggregated Group</u></p> | | | | | |

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| | | | <p><u>affected by a last resort event shall be initiated in accordance with prevailing rules and regulations on disconnection at the instance of the Central Registration Body if the Aggregated Group that elected to be served by a Supplier of Last Resort -</u></p> <p>i. <u>Fails to give notice within the period set out in clause 3.4.3.3.a; or</u></p> <p>ii. <u>Provides notice that it elects not to be transferred</u></p> | | | | | |

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| | | | <p>iii. <u>to a Supplier of Last Resort within the period set out in clause 3.4.3.3.a; or fails to enter into contract with the Supplier of Last Resort;</u></p> <p>iv. <u>Fails to serve notice within the period set out in clause 3.4.3.3.d.</u></p> <p>3.4.3.5 <u>The disconnection shall be carried out by the relevant Distribution Utility or Network Service Provider upon receipt of notice of</u></p> | | | | | |

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| | | | <u>disconnection served by the Central Registration Body in accordance with the procedures and timeline set out in relevant rules and regulations on disconnection of Aggregated Groups.</u> | | | | | |
| THE MARKET – PROCEDURES UPON OCCURRENCE OF LAST RESORT EVENTS | (new) | (new) | <p>3.4.4 <u>Last Resort Supply Events Affecting Aggregated Members</u></p> <p>3.4.4.1 <u>An Aggregated Member shall be transferred to the Supplier of Last Resort upon occurrence of any one of the following last resort events:</u></p> <p>a) <u>Breach of confidentiality regarding the</u></p> | This subsection covers conditions and procedures for transfer to SOLR of Members pursuant to Article IV Section 4 and Section 6 of the ERC Reso No. 04, Series of 2022. | <p>To exclude Aggregated Member that is, by itself, qualified as Retail Customer AND to consider that SOLR availment is subject to notification, within a specified period, of Aggregated Member to its Retail Aggregator.</p> <p>* * *</p> <p>Subsections (a) and (b) of Section 3.4.4.1 are not considered as Last Resort Supply Events. Subsection (a) is</p> | <p>3.4.4.1 An Aggregated Member, <u>unless it was able to switch to another Retail Aggregator, Supplier or RE Supplier, will</u> be transferred to the <i>Supplier of Last Resort</i> upon occurrence of any one of the following last resort events:</p> | | |

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| | | | <p><u>Aggregated Member's information;</u></p> <p>b) <u>The Aggregated Member failed to provide notification of intent to opt-out thirty (30) days prior to the intended opt-out date pursuant to Section 3.2.8.4 of this Retail Rules</u></p> <p>c) <u>Any other event which the ERC may deem as a last resort supply event.</u></p> <p>3.4.4.2 <u>Subject to procedures for termination of retail supply contracts of Aggregated</u></p> | Note: IEMOP has recommended to ERC that opt-out of the Aggregated Member will directly result to its reversion to the captive market without having to transfer to SOLR supply to simplify process for both the Aggregated Member, the SOLR and the CRB. | considered as an "act of default" by the Retail Aggregator under Section 6, Article IV of the Retail Aggregation Rules. Subsection (b), while provided for under Section 4, Article IV of the same rules, does not qualify such an event as a Last Resort Supply Event. | | | |

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| | | | <p><u>Members with Retail Aggregators under Section 3.2.8 of this Retail Rules, the Supplier of Last Resort shall submit a switch request in accordance with requirements and procedures under Section 3.2.1 and 3.2.2 of this Retail Rules to enable provision of supply to the Aggregated Member.</u></p> <p>3.4.4.3 <u>Upon evaluation, the Central Registration Body shall either approve or disapprove the switch request in accordance with</u></p> | | | | | |

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| | | | <u>procedures under</u> <u>Clauses 3.2.2 of this</u> <u>Retail Rules.</u> <u>3.4.4.4 The Aggregated</u> <u>Member shall be</u> <u>served by the</u> <u>Supplier of Last</u> <u>Resort for a</u> <u>maximum period of</u> <u>ninety (90) days.</u> <u>The said</u> <u>Aggregated</u> <u>Member shall be</u> <u>automatically</u> <u>reverted to the</u> <u>Captive Market at</u> <u>the end of such</u> <u>period unless the</u> <u>said Member has</u> <u>opted to join an</u> <u>Aggregated Group,</u> <u>pursuant to</u> <u>procedures under</u> | | | | | |

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| | | | <u>Section 3.2.1.7, of this Retail Rules, within the said period of time.</u> | | | | | |
| REVERSION TO THE CAPTIVE MARKET | (new) | <p><u>REVERSION TO CAPTIVE MARKET</u></p> <p><u>A GEOP End-User may revert to being a Captive End-User subject to fulfillment of all of the following conditions:</u></p> <p><u>3.5.1.1 Its average monthly peak demand has decreased below 75% of 100 kW for the immediately preceding 6 consecutive months and the same is not attributable to</u></p> | <p><u>3.5 REVERSION TO CAPTIVE MARKET</u></p> <p><u>3.5.1 Reversion of GEOP End-Users to the Captive Market</u></p> <p><u>3.5.1.1 A GEOP End-User may revert to being a Captive End-User subject to fulfillment of all of the following conditions:</u></p> <p><u>a) 3.5.1.1 Its average monthly peak demand has decreased below 75% of 100 kW for the immediately preceding 6 consecutive months and the same is not attributable to</u></p> | To specify section 3.5.1 for reversion of GEOP End-Users to the captive market | <p><u>General comment:</u> Kindly include all scenario that will allow retail customers to revert to captive (i.e., contestable to captive, aggregate member to captive).</p> <p>Please include the following grounds based on Section 24.1, Article VIII of the GEOP Rules:</p> <p>Fulfillment of the contractual obligations to the RE Supplier/s Agreement for the supply of electricity through the Distribution Utility, in accordance with the DSOAR</p> | <p><u>3.5.1.1 A GEOP End-User may revert to being a Captive End-User subject to fulfillment of all of the following conditions:</u></p> <p>a) x x x b) x x x c) x x x</p> <p><u>d) Fulfillment of the contractual obligations to the RE Supplier/s</u></p> <p><u>e) Agreement for the supply of electricity through the Distribution Utility, in accordance with ERC's Distribution Services and Open Access Rules (DSOAR)</u></p> | | |

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| | | <u>seasonal demand as confirmed by the Central Registration Body and the Metering Services Providers. rendering it ineligible to participate in the Green Energy Option Program:</u> 3.5.1.2 <u>Any of the last resort supply events under Clause 3.4.1 has occurred:</u> 3.5.1.3 <u>Its contract with a Supplier of Last Resort has exceeded the</u> | <u>seasonal demand as confirmed by the Central Registration Body and the Metering Services Providers. rendering it ineligible to participate in the Green Energy Option Program:</u> <u>b) 3.5.1.2 Any of the last resort supply events under Clause 3.4.1 has occurred:</u> <u>c) 3.5.1.3 Its contract with a Supplier of Last Resort has exceeded the maximum period.</u> <u>3.5.1.2 A GEOP End-User may only exercise its option to revert to being a Captive Customer once every twelve (12) months.</u> <u>3.5.1.3 Upon</u> | | | | | |

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| | | <p>maximum period.</p> <p>A GEOP End-User may only exercise its option to revert to being a Captive Customer once every twelve (12) months.</p> <p>Upon verification that the conditions under Clauses 3.5.1, 3.5.2 and 3.5.3 were fulfilled, the Central Registration Body shall process the deregistration of the GEOP End-User in accordance with procedures under Clause 2.6 of these Retail Rules.</p> | <p>verification that the conditions under Clauses 3.5.1, 3.5.1.2 and 3.5.1.3 were fulfilled. the Central Registration Body shall process the deregistration of the GEOP End-User in accordance with procedures under Clause 2.6 of these Retail Rules.</p> | | | | | |
| REVERSION TO THE CAPTIVE MARKET | (new) | (new) | <p><u>3.5.2 Reversion of Aggregated Group to the Captive Market</u></p> <p><u>3.5.2.1 An Aggregated Group shall revert to the captive</u></p> | Article IV Section 9 of ERC Reso. No. 04, S. of 2022 states conditions for status of contestability of Aggregated Group to become invalid. It is proposed that | Similar to our comment under Section 3.2.8.7, such instance was not contemplated for the Aggregated Group to revert to the captive market under the | | | |

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| | | | <u>market if its status of contestability has become invalid pursuant to conditions under Section 3.2.8.7 of this Retail Rules.</u> 3.5.2.2 The Retail Aggregator shall initiate the cessation of registration of the Aggregated Group with the Central Registration Body in accordance with procedures under Section 2.6 of these Retail Rules. | the Aggregated Group be reverted to the captive market upon lapse of status of contestability which will necessitate cessation of registration with the CRB | Retail Aggregation Rules. | | | |
| METERING-PROVISION OF METERING INSTALLATIONS | 4.3 | 4.3 PROVISION OF METERING INSTALLATIONS 4.3.1 Metering installations shall: | 4.3 PROVISION OF METERING INSTALLATIONS 4.3.1 Metering installations shall: | To comply with Article VI Section 2, 3 and 7 of ERC Reso No. 04, Series of 2022 | | | | |

| Retail Rules | | | | | | | | |
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| | | <p>4.3.1.1 Be provided by the <i>Retail Metering Services Provider</i>;</p> <p>4.3.1.2 Comply in all respects with the requirements of the <i>Distribution Code</i> relating to unbundled service, relevant regulatory issuances, and relevant <i>Market Manual</i> being implemented by the <i>Central Registration Body</i>.</p> <p>4.3.2 A <i>metering installation</i> shall:</p> <p>4.3.2.1 Be registered in the <i>WESM</i> through the <i>Central Registration Body</i>;</p> <p>4.3.2.2 Have electronic data recording facilities such that all <i>metering data</i> can be measured and recorded on an <i>interval</i> basis.</p> | <p>4.3.1.1 Be provided by the <i>Retail Metering Services Provider</i>;</p> <p>4.3.1.2 Comply in all respects with the requirements of the <i>Distribution Code</i> relating to unbundled service, relevant regulatory issuances, and relevant <i>Market Manual</i> being implemented by the <i>Central Registration Body</i>.</p> <p>4.3.2 A <i>metering installation of a Contestable Customer, GEOP End-User and Aggregated Members served by a Supplier of Last Resort</i> shall:</p> <p>4.3.2.1 Be registered in the <i>WESM</i> through the <i>Central Registration Body</i>;</p> | | | | | |

| Retail Rules | | | | | | | | |
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| | | | <p>4.3.2.2 Have electronic data recording facilities such that all <i>metering data</i> can be measured and recorded on an <i>interval</i> basis.</p> <p><u>For an Aggregated Group, the Retail Metering Services Provider shall designate a virtual metering installation which represents the aggregate meter data from physical metering installations of Aggregated Members belonging to the Aggregated Group. Only the virtual metering installation shall be registered with the Central Registration Body.</u></p> | | | | | |
| METERING-USE OF METERS | 4.3.4.1 | <p>4.3.4 Use of meters</p> <p>4.3.4.1 The registered metering installation shall be used by the Central</p> | <p>4.3.4 Use of meters</p> <p>4.3.4.1 The registered <i>metering installation</i> shall be used by the</p> | To be consistent with Article VI of ERC Reso No. 04, Series of 2022 | | | | |

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| | | Registration Body as the primary source of metering data for the accounting and settlement, as applicable, of the transactions of Contestable Retail Customers and Suppliers registered in the WESM. xxx | <i>Central Registration Body as the primary source of metering data for the accounting and settlement, as applicable, of the transactions of the following:</i> a) Retail Customers Contestable Customers b) GEOP End-Users c) Aggregated Members served by Supplier of Last Resort, d) Retail Electricity and Suppliers, e) Renewable Energy Suppliers; and f) Suppliers of Last Resort serving Contestable Customers, | | | | | |

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| | | | <p>GEOP End-Users and/or Aggregated Members.</p> <p>registered in the WESM.</p> <p><u>4.3.4.2 The registered virtual metering installation shall be used by the Central Registration Body as the primary source of metering data for the accounting and settlement, as applicable, of the transactions of the following:</u></p> <p>a) <u>Aggregated Groups,</u></p> <p>b) <u>Retail Aggregators and</u></p> <p>c) <u>Suppliers of Last Resort serving Aggregated Groups.</u></p> | | | | | |
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| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | Proposed Amendment (in red) | Rationale | Comments | Proposed Re-wording based on Comments | Proponent's Response | RCC Agreement |
| METERING – PERFORMANCE OF METERING INSTALLATIONS | 4.3.7 | <p>4.3.7 Performance of Metering Installations</p> <p>4.3.7.1 The <i>Retail Metering Services Provider</i> shall use all reasonable endeavours to ensure that <i>metering data</i> is capable of being transmitted to the metering database from its <i>metering installations</i>:</p> <p>i. Within the applicable accuracy parameters described in the <i>Philippine Distribution Code</i> and relevant <i>Market Manual</i>; and</p> <p>ii. Within the time required for</p> | <p>4.3.7 Performance of Metering Installations</p> <p>4.3.7.1 The <i>Retail Metering Services Provider</i> shall use all reasonable endeavours to ensure that <i>metering data</i> is capable of being transmitted to the metering database from its <i>metering installations</i>:</p> <p>i. Within the applicable accuracy parameters described in the <i>Philippine Distribution Code</i> and relevant <i>Market Manual</i>; and</p> <p>ii. Within the time required for settlement and at a level of availability of at least ninety-</p> | Intention of this provision is to clarify that performance of metering installations of Aggregated Members are not monitored by the CRB thus malfunctions or defects need not be reported. | | | | |

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| | | <p>settlement and at a level of availability of at least ninety-nine percent per annum or as otherwise agreed between the <i>Central Registration Body</i> and the <i>Retail Metering Services Provider</i>.</p> <p>4.3.7.2 If a <i>metering installation</i> malfunctions or defect occurs, the <i>Retail Metering Services Provider</i> shall ensure that repairs shall be made as soon as practicable and in any event within one (1) week for the meter and</p> | <p>nine percent per annum or as otherwise agreed between the <i>Central Registration Body</i> and the <i>Retail Metering Services Provider</i>.</p> <p>4.3.7.2 If a <i>metering installation</i> malfunctions or defect occurs, the <i>Retail Metering Services Provider</i> shall ensure that repairs shall be made as soon as practicable and in any event within one (1) week for the meter and within three (3) months for the instrument transformer from occurrence of the defect or malfunction, unless otherwise extended by the</p> | | | | | |

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| | | <p>within three (3) months for the instrument transformer from occurrence of the defect or malfunction, unless otherwise extended by the <i>Central Registration Body</i> upon request of the <i>Retail Metering Services Provider</i>.</p> <p>4.3.7.3 A Contestable <u>Retail</u> Customer who becomes aware of a <i>metering installation</i> malfunction or other defect shall advise the <i>Retail Metering Services Provider</i> and the <i>Central Registration Body</i> immediately after it was detected.</p> | <p>Central Registration Body upon request of the <i>Retail Metering Services Provider</i>.</p> <p>4.3.7.3 A Contestable <u>Retail</u> Customer who becomes aware of a <i>metering installation</i> malfunction or other defect shall advise the <i>Retail Metering Services Provider</i> and the <i>Central Registration Body</i> immediately after it was detected.</p> <p>4.3.7.4 <u>Clause 4.3.7.2 and 4.3.7.3 of this Retail Rules shall not be applicable to metering installation of Aggregated Members, unless the Aggregated Member is currently served by a Supplier of Last Resort.</u></p> | | | | | |
| METERING – METERING | 4.4 | 4.4 METERING DATA | 4.3 METERING DATA | To be consistent with Article VI of | | | | |

| Retail Rules | | | | | | | | |
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| DATA | | <p>4.4.1 Changes to Metering Data The <i>Retail Metering Services Provider</i> shall not make, cause or allow any alteration to the original stored data in a <i>metering installation</i>; and shall use reasonable endeavours to ensure that no other person or entity does the same.</p> <p>4.4.2 Data Transfer and Collection of Metering Data</p> <p>4.4.2.1 The <i>Retail Metering Services Provider</i> shall retrieve the <i>metering data</i> from the meter and transmit the data to the <i>Central Registration Body</i> within the</p> | <p>4.4.1 Changes to <i>Metering Data</i> The <i>Retail Metering Services Provider</i> shall not make, cause or allow any alteration to the original stored data in a <i>metering installation</i>; and shall use reasonable endeavours to ensure that no other person or entity does the same.</p> <p>4.4.2 Data Transfer and Collection of Metering Data of <u>Contestable Customers, GEOP End-Users and Aggregated Members served by Suppliers of Last Resort</u></p> <p>4.4.2.1 The <i>Retail Metering Services Provider</i> shall retrieve the <i>metering data</i> from the meter <u>of <i>Contestable Customers, GEOP End-Users and</i></u></p> | ERC Reso No. 04, Series of 2022 | | | | |

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| | | <p>period set out in the relevant <i>Market Manual</i>.</p> <p>4.4.2.2 The <i>Retail Metering Services Provider</i> shall not make, cause or allow any alteration to the original stored <i>metering data</i> as retrieved in the <i>metering installation</i>.</p> <p>4.4.2.3 The <i>Retail Metering Services Provider</i> must be capable of sending <i>metering data</i> in the required format to the <i>Central Registration Body</i>.</p> <p>4.4.2.4 The <i>Retail Metering Services Provider</i> shall, at its own cost,</p> | <p><u>Aggregated Members served by Suppliers of Last Resort</u> and transmit the data to the <i>Central Registration Body</i> within the period set out in the relevant <i>Market Manual</i>.</p> <p>4.4.2.2 The <i>Retail Metering Services Provider</i> shall not make, cause or allow any alteration to the original stored <i>metering data</i> as retrieved in the <i>metering installation</i>.</p> <p>4.4.2.3 The <i>Retail Metering Services Provider</i> must be capable of sending <i>metering data</i> in the required format to the <i>Central Registration Body</i>.</p> <p>4.4.2.4 The <i>Retail Metering Services Provider</i> shall, at its own cost, ensure that <i>metering</i></p> | | | | | |

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| | | <p>ensure that <i>metering data</i> derived from a <i>metering installation</i> for which it is responsible shows the time and date at which it is recorded and is capable of being transmitted from the <i>metering installation</i> to the metering database in accordance with the <i>Central Registration Body's</i> reasonable requirements.</p> <p>4.4.3 Conversion to Dispatch Interval Data</p> <p>4.4.3.1 The <i>Central Registration Body</i> shall be responsible for</p> | <p><i>data</i> derived from a <i>metering installation</i> for which it is responsible shows the time and date at which it is recorded and is capable of being transmitted from the <i>metering installation</i> to the metering database in accordance with the <i>Central Registration Body's</i> reasonable requirements.</p> <p>4.4.3 <u>Data Transfer and Collection of Metering Data of Aggregated Groups and Aggregated Members</u></p> <p>4.4.3.1 <u>The Retail Metering Services Provider shall retrieve the metering data from the meter of each Aggregated</u></p> | | | | | |

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| | | <p>converting the interval metering data submitted by the Retail Metering Services Providers to metering data for each dispatch interval of the WESM.</p> <p>4.4.3.2 The Central Registration Body shall publish in the relevant Market Manual the procedures for converting interval metering data to dispatch interval metering data.</p> | <p>4.4.3.2 <u>Member of an Aggregated Group. The Retail Metering Services Provider shall determine the metering data of an Aggregated Group which is the sum of the metering data of all Aggregated Members belonging to the Aggregated Group.</u></p> <p>4.4.3.3 <u>The Retail Metering Services Provider shall ensure that the metering data of an Aggregated Member that has opted out pursuant to Section 3.2.8 of this Retail Rules is excluded from the Aggregated Group metering data.</u></p> <p>4.4.3.4 <u>The Retail Metering Services Provider shall transmit the</u></p> | | | | | |

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| | | | <p><u>Aggregated Group metering data, determined under Section 4.4.3.2 of this Retail Rules, to the Central Registration Body within the period set out in the relevant Market Manual.</u></p> <p>4.4.3.5 <u>The Retail Metering Services Provider shall not make, cause or allow any alteration to the original stored metering data as retrieved in the metering installation.</u></p> <p>4.4.3.6 <u>The Retail Metering Services Provider must be capable of sending the Aggregated Group metering data in the required format to</u></p> | | | | | |

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| | | | <p>4.4.3.7 <u>the Central Registration Body. The Retail Metering Services Provider shall, at its own cost, ensure that the Aggregated Group metering data derived using Section 4.4.3.2 of this Retail Rules shows the time and date at which it is aggregated and is capable of being transmitted from to the metering database in accordance with the Central Registration Body's reasonable requirements.</u></p> <p>4.4.4 4.4.3 Conversion to Dispatch Interval Data</p> <p>4.4.4.1 The Central Registration Body shall be responsible for converting the</p> | | | | | |

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| | | | <p>interval metering data submitted by the Retail Metering Services Providers to metering data for each dispatch interval of the WESM.</p> <p>4.4.4.2 The Central Registration Body shall publish in the relevant Market Manual the procedures for converting interval metering data to dispatch interval metering data.</p> | | | | | |
| GLOSSARY | Chapter 5 | (new) | <u>Aggregated Group - End-users, the demand of which, has been consolidated and supplied by a Retail Aggregator to qualify for contestability under current rules issued by the DOE and the ERC.</u> | Adopted definition from Section 3 of ERC Reso No. 04, S. of 2022 | | | | |
| GLOSSARY | Chapter 5 | (new) | <u>Aggregated Member - End-user which is part of the Aggregated Group</u> | Adopted definition from Section 3 of ERC Reso No. 04, S. of 2022 | | | | |

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| GLOSSARY | Chapter 5 | (new) | <u>GEOP End-Users - Any person or entity requiring the supply and delivery of electricity sourcing 100% of its electricity requirements from renewable energy resources for its own use.</u> | Added since GEOP End-Users were not previously defined . Definition adopted from ERC Reso No. 08, S. of 2021 | | | | |
| GLOSSARY | Chapter 5 | (new) | <u>Retail Aggregator – A person or entity duly licensed by the ERC to engage in consolidating electric power demand of End-users for the purpose of purchasing and reselling electricity on a group basis</u> | Adopted definition from Section 3 of ERC Reso No. 04, S. of 2022 | | | | |
| GLOSSARY | Chapter 5 | <u>Retail Customer – An electricity end- user that is qualified to contract electricity supply from Suppliers in accordance with qualifications issued by the ERC either in the capacity of a Contestable Customer or a GEOP End-User as prescribed in Republic Act No. 9513. For clarity, the term “Retail Customer” shall collectively pertain to</u> | <u>Retail Customer – An electricity end- user that is qualified to contract electricity supply from Suppliers, in accordance with qualifications issued by the ERC either in the capacity of a Contestable Customer, or a GEOP End-User or an Aggregated Group as prescribed in Republic Act No. 9513. For clarity, the term “Retail Customer” shall collectively</u> | Updated definition of Retail Customer to cover Aggregated Groups | It appears that the phrase “as prescribed in Republic Act No. 9513” appears to be misplaced as this pertains to GEOP End-Users under Renewable Energy Law and not “Aggregated Group”. We suggest deleting said phrase. | Retail Customer – An electricity end- user that is qualified to contract electricity supply from Suppliers, in accordance with qualifications issued by the ERC either in the capacity of a Contestable Customer, GEOP End-User or an Aggregated Group as prescribed in Republic Act No. | | |

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| | | <u>"Contestable Customer" and "GEOP End-User" unless the context requires that the term specifically refer to either a "Contestable Customer" or "GEOP End-User".</u> | <u>pertain to "Contestable Customer", and "GEOP End-User" and Aggregated Group unless the context requires that the term specifically refer to either a "Contestable Customer", or "GEOP End-User" or Aggregated Group.</u> | | | 9543. For clarity, the term "Retail Customer" shall collectively pertain to "Contestable Customer", "GEOP End-User" and <i>Aggregated Group</i> unless the context requires that the term specifically refer to either a "Contestable Customer", "GEOP End-User" or <i>Aggregated Group</i> . | | |
| GLOSSARY | Chapter 5 | Retail Metering Services Provider - A person or entity authorized to provide metering services to contestable customers and registered with the <i>Central Registration Body</i> in that capacity in accordance with Chapter 2 of these <i>Retail Rules</i> . | Retail Metering Services Provider - A person or entity authorized to provide metering services to contestable customers Retail Customers and registered with the <i>Central Registration Body</i> in that capacity in accordance with Chapter 2 of these <i>Retail Rules</i> . | Updated to cover all Retail Customers | | | | |
| GLOSSARY | Chapter 5 | Supplier – refers to any person or entity authorized by the ERC to sell, broker, market or aggregate electricity to the end- users, <u>in the capacity of a Retail Electricity Supplier and/or</u> | Supplier – refers to any person or entity authorized by the ERC to sell, broker, market or aggregate electricity to the end- users, <u>in the capacity of a Retail Electricity Supplier. Retail Aggregator and/or</u> | Updated definition of Supplier to cover Retail Aggregators | | | | |

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| | | <u>Renewable Energy Supplier</u> , and registered as a Customer pursuant to Clause 2.3.2 of the WESM Rules and Clause 2.4.1.2 <u>and Clause 2.4.2.3</u> of these Retail Rules. | <u>Renewable Energy Supplier</u> , and registered as a Customer pursuant to Clause 2.3.2 of the WESM Rules and Clause 2.4.1.2 <u>and Clause 2.4.2.3</u> of these Retail Rules. | | | | | |

D. Retail Manual on Registration Criteria and Procedures

| Retail Manual on Registration Criteria and Procedures | | | | | | | | |
|--|-------------|---|--|--|----------|---------------------------------------|----------------------|---------------|
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| Please write general comments here, if any. | | | | | | | | |
| INTRODUCTION AND GENERAL GUIDELINES - PURPOSE & SCOPE OF APPLICATION | Section I-1 | Pursuant to Clause 2.5 of the <i>Retail Rules</i> , the <i>Central Registration Body</i> shall prepare and publish a <i>Market Manual</i> that shall provide the requirements and procedures for the registration of <i>Contestable Customers</i> , as applicable, <i>Suppliers</i> and <i>Retail Metering Service Providers</i> in the WESM. <u>Requirements and procedures for the registration of <i>Suppliers</i> that are <i>Renewable Energy Suppliers</i> and <i>Retail Customers</i> under the <i>Green Energy Option Program</i> are covered by the <i>Retail Manual on Green Energy Options Procedures</i>.</u> The criteria, guidelines and procedures for registration of <i>metering installations</i> are | Pursuant to Clause 2.5 of the <i>Retail Rules</i> , the <i>Central Registration Body</i> shall prepare and publish a <i>Market Manual</i> that shall provide the requirements and procedures for the registration of <i>Contestable Customers</i> , <u><i>Aggregated Groups and Aggregated Members</i></u> , as applicable, <u><i>Retail Electricity Suppliers</i></u> , <u><i>Retail Aggregators</i></u> and <i>Retail Metering Service Providers</i> in the WESM. <u>Requirements and procedures for the registration of <i>Suppliers</i> that are <i>Renewable Energy Suppliers</i> and <i>Retail Customers</i> under the <i>Green Energy Option Program</i> are covered by the <i>Retail Manual on Green Energy Options Procedures</i>.</u> The criteria, guidelines and procedures for registration of <i>metering installations</i> are covered by the <i>Retail Metering Manual</i> . The suspension and de-registration procedures shall be governed by the <i>WESM Market Manual</i> on Registration, | To include Retail Aggregation participants in the scope of this Manual | | | | |

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| | | <p>covered by the <i>Retail Metering Manual</i>. The suspension and de-registration procedures shall be governed by the <i>WESM Market Manual</i> on Registration, Suspension and De-Registration Criteria and Procedures.</p> <p>This Manual implements relevant provisions of Chapter 2 of the Rules for Competitive Retail Electricity Market ("Retail Rules").</p> | <p>Suspension and De-Registration Criteria and Procedures.</p> <p>This Manual implements relevant provisions of Chapter 2 of the Rules for Competitive Retail Electricity Market ("Retail Rules").</p> | | | | | |
| INTRODUCTION AND GENERAL GUIDELINES - GENERAL GUIDELINES | Section I -3 | <p>3. GENERAL GUIDELINES</p> <p>3.1 All <i>Contestable Customers, Suppliers, and Retail Metering Service Providers</i> authorized by the <i>Energy Regulatory Commission</i> are eligible to become members of the <i>WESM</i> subject to compliance with set membership criteria. Pursuant to Republic Act No. 9136, the <i>Energy Regulatory Commission</i> is the agency mandated to authorize other persons or entities that can be</p> | <p>3. GENERAL GUIDELINES</p> <p>3.1 All <i>Contestable Customers, <u>Retail Electricity</u> Suppliers, <u>Retail Aggregators</u></i> and <i>Retail Metering Service Providers</i> authorized by the <i>Energy Regulatory Commission</i> are eligible to become members of the <i>WESM</i> subject to compliance with set membership criteria. Pursuant to Republic Act No. 9136, the <i>Energy Regulatory Commission</i> is the agency mandated to authorize other persons or entities that can be eligible to become members of the <i>WESM</i>.</p> | To include Retail Aggregation participants in the scope of this Manual and to provide general guidelines for CRB-only registration of Contestable Customers and Aggregated Groups | | | | |

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| | | <p>eligible to become members of the <i>WESM</i>.</p> <p>3.2 Considering its implications, suspension and deregistration from the <i>WESM</i> shall be carried out in strict compliance with the procedures in <i>WESM Market Manual</i> on Registration, Suspension and De-Registration Criteria and Procedures.</p> | <p>3.2 Considering its implications, suspension and deregistration from the <i>WESM</i> shall be carried out in strict compliance with the procedures in <i>WESM Market Manual</i> on Registration, Suspension and De-Registration Criteria and Procedures.</p> <p><u>3.3 <i>Contestable Customers or Aggregated Groups</i> are considered registered with the <i>Central Registration Body</i> upon effectivity of switch to <i>Retail Electricity Suppliers</i> or <i>Retail Aggregators</i>, respectively, pursuant to relevant switching procedures in the Retail Rules.</u></p> <p><u>3.4 <i>Aggregated Members</i>, by themselves, shall not be registered with the <i>Central Registration Body</i> unless an <i>Aggregated Member</i> transfers to a <i>Supplier of Last Resort</i> pursuant to relevant procedures in the Retail Rules.</u></p> <p><u>3.5 Registration of <i>Aggregated Groups</i> that are directly connected to the transmission system in the <i>WESM</i> shall be in accordance with Section 2.2.4.2 of the <i>WESM Rules</i></u></p> | | | | | |

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| | | | <u>and the relevant provisions of the WESM Manual on Registration, Suspension and De-registration Criteria and Procedures.</u> | | | | | |
| INTRODUCTION AND GENERAL GUIDELINES - RESPONSIBILITIES | Section I-4.1.1 | 4.1.1 Applicants. All <i>Contestable Customers, Suppliers, and Retail Metering Service Providers</i> applying for registration in the <i>WESM</i> shall comply with the requirements and procedures set forth in this <i>Market Manual</i> and in the <i>Retail Rules</i> . | 4.1.1 Applicants. All <i>Contestable Customers, <u>Aggregated Groups, Aggregated Members, Retail Electricity Suppliers, Retail Aggregators</u></i> and <i>Retail Metering Service Providers</i> applying for registration in the <i>WESM</i> <u>and/or with the Central Registration Body</u> shall comply with the requirements and procedures set forth in this <i>Market Manual</i> and in the <i>Retail Rules</i> . | To include Retail Aggregation participants as potential applicants and to clarify that CRB-only registration is possible | | | | |
| REGISTRATION PROCEDURES - COVERAGE | Section II-1 | 2.1. COVERAGE Pursuant to Chapter 2 of the <i>Retail Rules</i> , this Section: <ul style="list-style-type: none"> a) Describes the <i>WESM</i> membership categories and levels of participation; b) Prescribes the pre-requisites for applying for <i>WESM</i> registration; and | 2.1 COVERAGE Pursuant to Chapter 2 of the <i>Retail Rules</i> , this Section: <ul style="list-style-type: none"> a) Describes the <i>WESM</i> membership categories and levels of participation; b) Prescribes the pre-requisites for applying for <i>WESM</i> registration; and c) Provides the procedures for pre-registration by <u><i>Retail</i></u> | To include Retail Aggregation participants as potential applicants and to clarify that CRB-only registration is possible | | | | |

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| | | <p>c) Provides the procedures for pre-registration by Suppliers, Contestable Customers, and Retail Metering Service Providers upon integration of retail competition in the WESM.</p> <p>The procedures and criteria for registering in the WESM as a WESM Member are covered by the WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures. This section provides information requirements and procedures that will guide the Contestable Customers, Suppliers, and Retail Metering Services Providers in applying for membership.</p> | <p><u>Electricity Suppliers, Retail Aggregators, Contestable Customers, Aggregated Groups, Aggregated Members</u> and Retail Metering Service Providers upon integration of retail competition <u>with the Central Registration Body and/or</u> in the WESM.</p> <p>The procedures and criteria for registering in the WESM as a WESM Member are covered by the WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures. This section provides information requirements and procedures that will guide the Contestable Customers, <u>Aggregated Groups, Aggregated Members, Retail Electricity Suppliers, Retail Aggregators</u> and Retail Metering Services Providers in applying for ees membership.</p> | Clerical revision | | | | |
| REGISTRATION PROCEDURES - REGISTRATION OF | Section II-2 | 2 REGISTRATION OF SUPPLIERS | 2 REGISTRATION OF <u>RETAIL ELECTRICITY</u> SUPPLIERS, <u>RETAIL</u> | To specify that this Section governs | For confirmation why Renewable Energy Suppliers | | | |

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| SUPPLIERS | | <p>2.1. Overview</p> <p><i>Suppliers</i> shall register in the <i>WESM</i> as a <i>Direct WESM Members</i> under the <i>Customer Trading Participant</i> category and shall fulfill all such registration requirements as provided for in Chapter 2 of the <i>WESM Rules</i>.</p> <p><i>Distribution Utilities</i> shall register as <i>Direct WESM Members</i> in their capacity as <i>Local Suppliers</i> and <i>Suppliers of Last Resort</i>.</p> <p>Applications for registration shall be submitted to the <i>Market Operator</i> together with documents and information required by the <i>Market Operator</i> to prove compliance with membership criteria and requirements for registration.</p> <p><i>Suppliers</i> must have completed their registration as <i>Direct WESM Members</i> before they can transact in the <i>WESM</i></p> | <p><u>AGGREGATORS AND SUPPLIERS OF LAST RESORT</u></p> <p>2.1. Overview</p> <p><u>Retail Electricity Suppliers and Retail Aggregators</u> shall register in the <i>WESM</i> as a <i>Direct WESM Members</i> under the <i>Customer Trading Participant</i> category and shall fulfill all such registration requirements as provided for in Chapter 2 of the <i>WESM Rules</i>.</p> <p><i>Distribution Utilities</i> shall register as <i>Direct WESM Members</i> in their capacity as <i>Local Suppliers</i> and <i>Suppliers of Last Resort</i>.</p> <p>Applications for registration shall be submitted to the <i>Market Operator</i> together with documents and information required by the <i>Market Operator</i> to prove compliance with membership criteria and requirements for registration.</p> <p><u>Retail Electricity Suppliers and Retail Aggregators</u> must have completed their registration as <i>Direct WESM Members</i> before they can transact in</p> | registration of Retail Electricity Suppliers, Retail Aggregators and Suppliers of Last Resort | are not included in this definition, but are within the scope of Suppliers? | | | |

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| | | <p>for their <i>Contestable Customer</i> counterparties.</p> <p>2.2. Information Requirements</p> <p>2.2.1. The <i>Suppliers</i> shall submit to the <i>Market Operator</i> the specific documents and information required as posted in the market information website to prove its compliance with <i>WESM</i> membership criteria and qualifications.</p> <p>2.2.2. Once an applicant submits an accomplished application form with supporting requirements, the <i>Market Operator</i> shall assess and evaluate the application in accordance with Chapter 2 of the <i>WESM Rules</i> and <i>WESM Manual on Registration</i>,</p> | <p>the <i>WESM</i> for their <i>Contestable Customer</i> <u>or Aggregated Group</u> counterparties.</p> <p>2.2. Information Requirements</p> <p>2.2.1. The <u>Retail Electricity Suppliers and Retail Aggregators</u> shall submit to the <i>Market Operator</i> the specific documents and information required as posted in the market information website to prove its compliance with <i>WESM</i> membership criteria and qualifications.</p> <p>2.2.2. Once an applicant submits an accomplished application form with supporting requirements, the <i>Market Operator</i> shall assess and evaluate the application in accordance with Chapter 2 of the <i>WESM Rules</i> and <i>WESM Manual on Registration</i>, Suspension and De-Registration Criteria and Procedures.</p> <p>2.2.3. The <u>Retail Electricity Suppliers, Retail Aggregators, Local Suppliers and Suppliers of Last</u></p> | | | | | |

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| | | <p>Suspension and De-Registration Criteria and Procedures.</p> <p>2.2.3. The <i>Suppliers, Local Suppliers and Suppliers of Last Resort</i> shall submit to the <i>Central Registration Body</i> for posting in the market website the contracting parameters including the general offer, terms and conditions such as indicative average contract price, offers and scope of services being offered by them.</p> | <p><i>Resort</i> shall submit to the <i>Central Registration Body</i> for posting in the market website the contracting parameters including the general offer, terms and conditions such as indicative average contract price, offers and scope of services being offered by them.</p> | | | | | |
| REGISTRATION PROCEDURES – CONTESTABLE CUSTOMERS | Section II-3 | <p>3 REGISTRATION OF CONTESTABLE CUSTOMERS</p> <p>3.1 Overview Registration shall be in accordance with the certification of contestability issued by the <i>Energy</i></p> | <p>3 REGISTRATION OF CONTESTABLE CUSTOMERS, <u>AGGREGATED GROUPS AND AGGREGATED MEMBERS</u></p> <p><u>3.1 Registration of Contestable Customers</u></p> <p><u>3.1.1</u> 3.1 Overview</p> | Renumbering of Section 3.1 to specify that this Section is for registration of Contestable Customers | Regarding Section 3.1.1, please see similar comment in Section 2.2.7. We suggest updating this by reflecting monthly billing statement issued by the NSP which is the basis of the contestability of | <p>3.1.1 Overview</p> <p>Registration shall be in accordance with the certification of contestability issued by the <i>Energy Regulatory Commission</i> <u>or the monthly billing</u></p> | | |

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| | | <p><i>Regulatory Commission</i> which is on a “facility” basis in that each certificate is attached to a metering point. For registration purposes, entities who have more than one (1) <i>registered facility</i> shall have multiple registrations and, at their option, each registration may either be as <i>Direct WESM Member</i> or <i>Indirect WESM Member</i>.</p> <p>Directly-connected customers are required to register in the <i>WESM</i> pursuant to <i>WESM Rules</i> Clause 2.2.4.2 whether or not it is certified by the ERC as a <i>Contestable Customer</i>.</p> | <p>Registration shall be in accordance with the certification of contestability issued by the <i>Energy Regulatory Commission</i> which is on a “facility” basis in that each certificate is attached to a metering point. For registration purposes, entities who have more than one (1) <i>registered facility</i> shall have multiple registrations and, at their option, each registration may either be as <i>Direct WESM Member</i> or <i>Indirect WESM Member</i>.</p> <p>Directly-connected customers are required to register in the <i>WESM</i> pursuant to <i>WESM Rules</i> Clause 2.2.4.2 whether or not it is certified by the ERC as a <i>Contestable Customer</i>.</p> | | <p>concerned customer.</p> <p>Regarding Section 3.1.2.1 (h), we note that contestable customers are not required to signify their interest in RCOA. Furthermore, the DU is only notified upon the receipt of a switch request. Only eligible GEOP customers were required to signify their interest in participating in GEOP.</p> <p>Regarding the requirement to provide the SEIN, we note that based on previous clarifications and coordination with IEMOP, the relevant requirement necessary in the report is the grid</p> | <p><u>statement by the Network Service Provider indicating that the end-user has qualified to be a Contestable Customer, or such other certifications as may be allowed under applicable laws or rules,</u> which is on a “facility” basis... x x x</p> <p>3.1.2.1-The-Network Service Providers shall submit to the <u><i>Central Registration Body</i></u> the following customer information of newly qualified customers that have met the threshold of contestability every <u>fifteenth (15th) day of the month:</u></p> <p>a) Customer name; b) Billing and service addresses;</p> | | |
| | | <p>3.2 Pre-registration Procedures</p> | <p>3.1.2 3.2Pre-registration Procedures</p> <p>3.1.2.1 3.2.1Distribution Utilities shall notify the Central</p> | | | | | |

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| | | <p>3.2.1 Distribution Utilities shall notify the Central Registration Body within fifteen (15) working days from its validation that a customer has met the required demand threshold of contestability. The Distribution Utilities <u>Network Service Providers</u> shall submit to the Central Registration Body the following customer information <u>of newly qualified customers that have met the threshold of contestability every fifteenth (15th) day of the month:</u></p> <p>a) Customer name; b) Billing and service addresses; c) Customer's account number; d) Customer contact information</p> | <p>Registration Body within fifteen (15) working days from its validation that a customer has met the required demand threshold of contestability. The Distribution Utilities <u>Network Service Providers</u> shall submit to the Central Registration Body the following customer information <u>of newly qualified customers that have met the threshold of contestability every fifteenth (15th) day of the month:</u></p> <p>a) Customer name;</p> | | <p>off-take metering point. <u>The SEIN is generated by IEMOP and not by the Network Services Providers.</u></p> <p>Hence, for clarity, it is deemed best to replace the information on item (g) to Grid Off-take Metering Point.</p> | <p>c) Customer's account number; d) Customer contact information (telephone numbers and e-mail addresses); e) Meter number; f) Meter specifications (interval metering, channels); and g) SEIN of the Grid metering point of the Distribution Utility where the supply of the end user passes through.; <u>and</u> h) <u>For end-users who will participate in GEOP:</u> Confirmation that the end-user has signified interest to participate <u>as a GEOP End-User, under retail competition</u></p> | | |

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| | | <p>(telephone numbers and e-mail addresses);</p> <p>e) Meter number;</p> <p>f) Meter specifications (interval metering, channels); and</p> <p>g) SEIN of the grid metering point of the Distribution Utility where the supply of the end user passes through.; and</p> <p>h) <u>Confirmation that the end-user has signified interest to participate under retail competition.</u></p> <p>3.2.2 The <i>Distribution Utilities</i> shall use the form published by the <i>Central Registration Body</i> in the market information website in providing the customer information of the end</p> | <p>b) Billing and service addresses;</p> <p>c) Customer's account number;</p> <p>d) Customer contact information (telephone numbers and e-mail addresses);</p> <p>e) Meter number;</p> <p>f) Meter specifications (interval metering, channels); and</p> <p>g) SEIN of the grid metering point of the Distribution Utility where the supply of the end user passes through.; and</p> | | | | | |

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| | | <p>users identified in this Section.</p> <p>3.2.2. The Central Registration Body, within five (5) working days from receipt of such notice, shall secure confirmation from the ERC if such customer has been certified as contestable and, if so certified, shall maintain record of the customer in the database registry for Contestable Customers.</p> <p>3.2.3. If a Contestable Customer intends to voluntarily participate in the WESM directly, it shall enter into a retail supply contract and register as Direct WESM Member and shall fulfill all such</p> | <p>h) <u>Confirmation that the end-user has signified interest to participate under retail competition.</u></p> <p>3.1.2.2 3.2.2The Distribution Utilities shall use the form published by the Central Registration Body in the market information website in providing the customer information of the end users identified in this Section.</p> <p>3.2.2. The Central Registration</p> | | | | | |

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| | | <p>registration requirements. If a <i>Contestable Customer</i> does not intend to participate in the <i>WESM</i> but voluntarily entered into a retail supply contract, its <i>Supplier</i> shall register the <i>Contestable Customer</i> with the <i>Central Registration Body</i> in accordance with <i>Retail Rules</i> Clause 3.2.2.3.</p> <p>3.2.4. The <i>Supplier</i> may submit a switch request to the <i>Central Registration Body</i> for the voluntary registration of <i>Contestable Customer</i> in the <i>WESM</i> in accordance with <i>Retail Rules</i> 3.2.2.1.</p> <p>3.3. Information Requirements</p> <p>3.3.1. For voluntary <i>Direct WESM</i></p> | <p>Body, within five (5) working days from receipt of such notice, shall secure confirmation from the ERC if such customer has been certified as contestable and, if so certified, shall maintain record of the customer in the database registry for Contestable Customers.</p> <p>3.1.2.3 3.2.3. If a <i>Contestable Customer</i> intends to voluntarily participate in the <i>WESM</i> directly, it shall enter into a retail supply contract and</p> | | | | | |

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| | | <p><i>Membership of Contestable Customers, the Contestable Customer (applying as a Direct WESM member) and Supplier shall submit to the Market Operator the specific information and documents as posted in the market information website in accordance with the Retail Rules and this Market Manual.</i></p> <p>3.3.2. <i>Contestable Customer</i> not wishing to register as a <i>Direct WESM Member</i>, shall be enrolled by its Supplies (applying on behalf of the <i>Contestable Customer</i>) with the <i>Central Registration Body</i> and shall submit specific information and</p> | <p>register as <i>Direct WESM Member</i> and shall fulfill all such registration requirements. If a <i>Contestable Customer</i> does not intend to participate in the <i>WESM</i> but voluntarily entered into a retail supply contract, its <i>Supplier</i> shall register the <i>Contestable Customer</i> with the <i>Central Registration Body</i> in accordance with <i>Retail Rules</i> Clause 3.2.2.3.</p> <p>3.1.2.4 3.2.4. The <i>Supplier</i> may submit a switch request to the <i>Central</i></p> | | | | | |

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| | | <p>documents as posted in the <i>market information website</i> in accordance with the <i>Retail Rules</i> and this <i>Market Manual</i>.</p> <p>3.3.3. The <i>Central Registration Body</i> shall immediately assess the completion of the information requirements and it shall notify the <i>Supplier</i> and the <i>Contestable Customer</i>, as applicable, on the status and further requirements, if any, such as prudential requirement, for the approval of <i>switch request</i> within two (2) <i>working days</i> from the receipt of the <i>switch request</i>.</p> <p>3.3.4. The <i>Central Registration Body</i> shall approve the</p> | <p><i>Registration Body</i> for the voluntary registration of <i>Contestable Customer</i> in the <i>WESM</i> in accordance with <i>Retail Rules</i> 3.2.2.1.</p> <p>3.1.3 3.3. Information Requirements</p> <p>3.1.3.1 3.3.1. For voluntary <i>Direct WESM Membership</i> of <i>Contestable Customers</i>, the <i>Contestable Customer</i> (applying as a <i>Direct WESM member</i>) and <i>Supplier</i> shall submit to the <i>Market Operator</i> the specific information and documents as posted in the <i>market information website</i> in accordance with the</p> | | | | | |

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| | | <p>switch request upon completion of the requirements and it shall notify the new <i>Supplier</i>, the incumbent <i>Supplier</i>, the <i>Contestable Customer</i> (as applicable), the <i>Retail Metering Services Provider</i> and the relevant <i>Distribution Utility</i> or <i>Network Service Provider</i> of the confirmation of the <i>switch request</i> and the effective date of the switch within two (2) working days in accordance with the <i>Retail Rules</i> Clause 3.2.2.1 to 3.2.2.3.</p> <p>3.4. Reporting</p> <p>3.4.1. The <i>Central Registration Body</i> shall provide a</p> | <p><i>Retail Rules</i> and this <i>Market Manual</i>.</p> <p>3.1.3.2 3.3.2. <i>Contestable Customer</i> not wishing to register as a <i>Direct WESM Member</i>, shall be enrolled by its <i>Supplies</i> (applying on behalf of the <i>Contestable Customer</i>) with the <i>Central Registration Body</i> and shall submit specific information and documents as posted in the <i>market information website</i> in accordance with the <i>Retail Rules</i> and this <i>Market Manual</i>.</p> <p>3.1.3.3 3.3.3. The <i>Central Registration Body</i> shall immediately assess the completion of the information requirements and it shall notify the <i>Supplier</i> and the <i>Contestable</i></p> | | | | | |

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| | | <p>monthly report to each <i>Distribution Utility</i> on the timeliness and completeness of its submission under Section 3.2.1 on or before the end of each month.</p> <p>3.4.2. The <i>Central Registration Body</i> shall submit a quarterly report to the ERC and the DOE on the timeliness and completeness of the submission of the <i>Distribution</i></p> | <p><i>Customer</i>, as applicable, on the status and further requirements, if any, such as prudential requirement, for the approval of <i>switch request</i> within two (2) <i>working days</i> from the receipt of the <i>switch request</i>.</p> <p>3.1.3.4 3.3.4. The <i>Central Registration Body</i> shall approve the switch request upon completion of the requirements and it shall notify the new <i>Supplier</i>, the incumbent <i>Supplier</i>, the <i>Contestable Customer</i> (as applicable), the <i>Retail Metering Services Provider</i> and the relevant <i>Distribution Utility</i> or <i>Network Service Provider</i> of the confirmation of the</p> | | | | | |

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| | | <p><i>Utilities</i> with Section 3.2.1 on or before the 15th day of the month after the end of each quarter.</p> | <p>switch request and the effective date of the switch within two (2) working days in accordance with the <i>Retail Rules</i> Clause 3.2.2.1 to 3.2.2.3.</p> <p>3.1.4 3.4. Reporting</p> <p><u>3.1.4.1</u> 3.4.1. The <i>Central Registration Body</i> shall provide a monthly report to each <i>Distribution Utility</i> on the timeliness and completeness of its submission under Section 3.2.1 on or before the end of each month.</p> <p><u>3.1.4.2</u> 3.4.2. The <i>Central Registration Body</i> shall submit a quarterly report to the ERC and the DOE on the timeliness and completeness of the submission of the</p> | | | | | |

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| | | | <i>Distribution Utilities</i> with Section 3.2.1 on or before the 15 th day of the month after the end of each quarter. | | | | | |
| REGISTRATION PROCEDURES – REGISTRATION OF CONTESTABLE CUSTOMERS | Section II-3 | (new) | <p>3.2 <u>Registration of Aggregated Groups and Aggregated Members</u></p> <p>3.2.1 <u>Aggregated Groups connected to the distribution system shall register with the Central Registration Body only.</u></p> <p>3.2.2 <u>Registration of Aggregated Groups that are directly connected to the transmission system shall be in accordance with Section 2.2.4.2 of the WESM Rules and the relevant provisions of the WESM Manual on Registration, Suspension and De-registration Criteria and Procedures</u></p> <p>3.2.3 <u>Eligibility of Aggregated Groups to register and transact with the Central Registration Body shall be based on the issuance of certification by the Retail</u></p> | <p>Include dedicated subsection for registration of aggregated groups and aggregated members consistent with section 2.2 of the Retail Rules</p> <p>Submission of pre-switch customer information and related reportorial requirements are not applicable to Aggregated Groups and Aggregated Members</p> | | | | |

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| | | | <p><u>Aggregator that the consolidated demand of the Aggregated Group has met the threshold for contestability and has fulfilled the criteria for aggregation within a contiguous area under applicable laws and rules.</u></p> <p>3.2.4 <u>The Retail Aggregator shall register the Aggregated Group with the Central Registration Body by submitting a switch request in accordance with Retail Rules Clause 3.2.1 and 3.2.2.</u></p> <p>3.2.5 <u>Aggregated Members, by themselves, shall not be registered with the Central Registration Body unless an Aggregated Member transfers to a Supplier of Last Resort pursuant to conditions under Section 3.2.8 and Section 3.4 of the Retail Rules.</u></p> <p>3.2.6 <u>The Supplier of Last Resort shall register the Aggregated Member with the Central Registration Body by submitting a switch request</u></p> | | | | | |

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| | | | <u>in accordance with Retail Rules Clause 3.2.1 and 3.2.2.</u> | | | | | |
| REGISTRATION PROCEDURES – REGISTRATION OF METERING SERVICE PROVIDERS | Section II-4.1 | <p>4.1 Overview</p> <p>Persons or entities wishing to register with the <i>Central Registration Body</i> as a <i>Retail Metering Services Provider</i> must have been authorized and issued the pertinent license or authorization to operate as <i>Retail Metering Services Provider</i> by the ERC and shall register in the <i>WESM</i> as a <i>Retail Metering Services Provider</i> and shall fulfil all such registration requirements as set out in Chapter 2 of the <i>WESM Rules</i>.</p> <p>Upon the commencement of retail competition, <i>Distribution Utilities</i> shall serve as the default <i>Retail Metering Services Provider</i> for <i>Contestable Customers</i> with service addresses located within their franchise area and are deemed registered in the <i>WESM</i> without need of</p> | <p>4.1 Overview</p> <p>Persons or entities wishing to register with the <i>Central Registration Body</i> as a <i>Retail Metering Services Provider</i> must have been authorized and issued the pertinent license or authorization to operate as <i>Retail Metering Services Provider</i> by the ERC and shall register in the <i>WESM</i> as a <i>Retail Metering Services Provider</i> and shall fulfil all such registration requirements as set out in Chapter 2 of the <i>WESM Rules</i>.</p> <p>Upon the commencement of retail competition, <i>Distribution Utilities</i> shall serve as the default <i>Retail Metering Services Provider</i> for <i>Contestable Customers</i>, <u><i>Aggregated Groups and Aggregated Members, as applicable</i></u>, with service addresses located within their franchise area and are deemed registered in the <i>WESM</i> without need of complying with registration requirements. <u><i>shall register in the WESM. The Market Operator may also require existing</i></u></p> | <p>To cover provision of metering service to Aggregated Groups and Aggregated Members</p> <p>To harmonize with revisions to Section 2.4.9 of the Retail Rules</p> | <p>It is unclear what other registration requirements are being contemplated for Retail Metering Service Providers that are already serving contestable customers. We propose deleting the last sentence until there is a specific list of requirements and such list has been discussed with stakeholders.</p> | <p>xxx The Market Operator may also require existing Retail Metering Services Providers currently serving Contestable Customers who intends to provide service to GEOP End Users to submit registration requirements. xxx</p> | | |

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| | | complying with registration requirements. | <u>Retail Metering Services Providers currently serving Contestable Customers who intends to provide service to GEOP End-Users to submit registration requirements.</u> | | | | | |
| SUSPENSION, DISCONNECTION AND DE-REGISTRATION | Section III | <p><u>1. FOR PARTICIPANTS REGISTERED IN THE WESM</u></p> <p>The suspension, de-registration and cessation of the membership of the Suppliers, <u>Retail Metering Services Providers</u> and <u>Contestable Customers</u> in the WESM shall be governed by the WESM Rules, Retail Rules and relevant Market Manuals, <u>provided that the Contestable Customer and/or its relevant Supplier is not required to provide notice of cessation of WESM membership of a Contestable Customer to the System Operator.</u></p> | <p><u>1. FOR PARTICIPANTS REGISTERED IN THE WESM</u></p> <p>The suspension, de-registration and cessation of the membership of the Suppliers, <u>Retail Metering Services Providers</u> and <u>Contestable Customers</u> in the WESM shall be governed by the WESM Rules, Retail Rules and relevant Market Manuals, <u>provided that the Contestable Customer and/or its relevant Supplier is not required to provide notice of cessation of WESM membership of a Contestable Customer to the System Operator.</u></p> <p><u>Upon suspension, deregistration, or cessation of membership from the WESM, the Supplier, Retail</u></p> | | <p>Under 2.1.1, We note that it should be the Supplier or the Retail Aggregator who should determine reversion to captive, particularly if demand is below threshold.</p> <p>What do we mean by "Termination from its network"?</p> <p>What do we mean by "Termination of the Contestable Customer or an Aggregated Group"?</p> <p>Under 2.2.1, We note that Sec. 3.2.1.7 of the</p> | <p>2.1.1 The incumbent Supplier, Retail Aggregator or SOLR shall initiate the termination of registration of a Contestable Customer or an Aggregated Group when it receives notice from the Network Service Provider that the Contestable Customer or Aggregated group that it will fall under has met any of the following conditions: xxx</p> | | |

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| | | <p><u>Upon suspension, deregistration, or cessation of membership from the WESM, the Supplier, Retail Metering Services Provider or Contestable Customer shall also be deemed suspended, deregistered or ceased with the Central Registration Body.</u></p> <p>2. FOR PARTICIPANTS REGISTERED WITH THE CENTRAL REGISTRATION BODY ONLY</p> <p><u>The cessation of registration of Contestable Customers that are not registered in the WESM but registered with the Central Registration Body shall be governed by the following:</u></p> <p>2.1 The incumbent Supplier or Supplier of</p> | <p><u><i>Metering Services Provider or Contestable Customer shall also be deemed suspended, deregistered or ceased with the Central Registration Body.</i></u></p> <p>2. FOR PARTICIPANTS REGISTERED WITH THE CENTRAL REGISTRATION BODY ONLY</p> <p>2.1 <u>The cessation of registration of Contestable Customers and Aggregated Groups that are not registered in the WESM but registered with the Central Registration Body shall be governed by the following:</u></p> <p>2.1.1 <u>2.4The incumbent Supplier or Supplier of Last Resort shall initiate the termination of registration of a Contestable Customer or an</u></p> | <p>To clarify that Section 2.1 is specific for cessation of registration of CCs and AGs registered with CRB only</p> <p>Procedures for cessation for CCs is proposed to be applied to AGs by virtue of CCs and AGs being equivalent pursuant to ERC Reso No. 04, S. of 2022</p> | <p>Retail Rules does not provide the procedures on how an Aggregated Member will join another Aggregated Group. Given this, we respectfully suggest including provisions that will discuss how an Aggregated Member will transfer to another Aggregated Group.</p> <p>Under 2.2.2, may we be clarified why would the SOLR need to coordinate with the Retail Aggregator when the Aggregated Member has already shifted to SOLR?</p> | | | |

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| | | <p><u>Last Resort shall initiate the termination of registration of a Contestable Customer when it receives notice from the relevant Network Service Provider that the Contestable Customer has met any of the following conditions:</u></p> <p>i. <u>Termination from its network; or</u></p> <p>ii. <u>Reversion to being a Captive End-User.</u></p> <p>2.2 The incumbent <u>Supplier or Supplier of Last Resort shall provide a notice to the Central Registration Body in writing which shall, among other things, specify the date on which the Contestable Customer shall cease to be registered, which date shall not be less than thirty (30) business days after the date on which the</u></p> | <p><u>Aggregated Group when it receives notice from the relevant Network Service Provider that the Contestable Customer or an Aggregated Group has met any of the following conditions:</u></p> <p>i. <u>Termination from its network; or</u></p> <p>ii. <u>Reversion to being a Captive End-User.</u></p> <p>2.1.2 <u>2.2The incumbent Supplier or Supplier of Last Resort shall provide a notice to the Central Registration Body in writing which shall, among other things, specify the date on which the Contestable</u></p> | | | | | |

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| | | <p><u>Supplier sends the notice.</u></p> <p><u>2.3. If the reason for cessation of registration is the termination of the Contestable Customer, the notice to be submitted by the incumbent Supplier or Supplier of Last Resort to the Central Registration Body shall be accompanied by the proof of termination of Contestable Customer, as well as a notice of cessation to the Network Service Provider and copy of its proof of receipt of the notice.</u></p> <p><u>2.4. If the reason for cessation of registration is the reversion of the Contestable Customer to being a Captive End-User, the notice to be submitted by the incumbent Supplier or Supplier of Last Resort to the Central Registration Body shall be</u></p> | <p>2.1.3 <u>Customer or an Aggregated Group shall cease to be registered, which date shall not be less than thirty (30) business days after the date on which the Supplier sends the notice.</u></p> <p>2.3 <u>If the reason for cessation of registration is the termination of the Contestable Customer or an Aggregated Group, the notice to be submitted by the incumbent Supplier or Supplier of Last Resort to the Central Registration Body shall be accompanied by the proof of termination of Contestable Customer or an Aggregated Group.</u></p> | | | | | |

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| | | <p><u>accompanied by the approval by the Energy Regulatory Commission that the <i>Contestable Customer</i> has met the conditions for reversion and confirmation from the incumbent <i>Supplier</i> or <i>Supplier of Last Resort</i> that the <i>Contestable Customer</i> has fulfilled all contractual obligations.</u></p> <p><u>2.5 The cessation shall be effective on the date stated in the notice submitted by the incumbent <i>Supplier</i> or <i>Supplier of Last Resort</i> or on such other date as may be notified by the <i>Central Registration Body</i> which shall not be less than thirty (30) business days from the date the notice was sent by the incumbent <i>Supplier</i> or <i>Supplier of Last Resort</i>, subject to completeness of requirements.</u></p> | <p><u>as well as a notice of cessation to the Network Service Provider and copy of its proof of receipt of the notice.</u></p> <p><u>2.1.4 2.4 If the reason for cessation of registration is the reversion of the <i>Contestable Customer</i> or an <i>Aggregated Group</i> to being a Captive End-User, the notice to be submitted by the incumbent <i>Supplier</i> or <i>Supplier of Last Resort</i> to the <i>Central Registration Body</i> shall be accompanied by the approval by the Energy Regulatory Commission that the <i>Contestable Customer</i> or an <i>Aggregated Group</i> has met the</u></p> | | | | | |

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| | | <p><u>Upon submission of the notice of cessation by the incumbent Supplier or Supplier of Last Resort and on the effective date, the Contestable Customer shall cease to be registered as a Contestable Customer with the Central Registration Body and shall cease all activities relevant to a Contestable Customer.</u></p> <p><u>2.7 Notwithstanding cessation of registration, all outstanding obligations and liabilities to the Central Registration Body, including financial liabilities and obligations which may arise under the Retail Rules, of the Contestable Customer shall remain valid and subsisting until fully settled.</u></p> | <p><u>conditions for reversion and confirmation from the incumbent Supplier or Supplier of Last Resort that the Contestable Customer or an Aggregated Group has fulfilled all contractual obligations.</u></p> <p>2.1.5 <u>2.5</u>The cessation shall be effective on the date stated in the notice submitted by the incumbent Supplier or Supplier of Last Resort or on such other date as may be notified by the Central Registration Body which shall not be less than thirty (30) business days from the date the notice was sent by the incumbent Supplier</p> | | | | | |

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| | | <p><u>2.8 A Contestable Customer may be registered again with the Central Registration Body upon approval of switch request submitted by a new Supplier, subject to eligibility requirements.</u></p> | <p>2.1.6 <u>2.6</u> Upon submission of the notice of cessation by the incumbent Supplier or Supplier of Last Resort and on the effective date, the Contestable Customer <u>or an Aggregated Group</u> shall cease to be registered as a Contestable Customer <u>or an Aggregated Group</u> with the Central Registration Body and shall cease all activities relevant to a Contestable Customer <u>or an Aggregated Group</u>.</p> <p>2.1.7 <u>2.7</u> Notwithstanding cessation of</p> | | | | | |

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| | | | <p><u>registration, all outstanding obligations and liabilities to the Central Registration Body, including financial liabilities and obligations which may arise under the Retail Rules, of the Contestable Customer or an Aggregated Group shall remain valid and subsisting until fully settled.</u></p> <p>2.1.8 2.8A <u>Contestable Customer or an Aggregated Group may be registered again with the Central Registration Body upon approval of switch request submitted by a new Supplier, subject to eligibility requirements.</u></p> | | | | | |

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| | | | <p><u>2.2 The cessation of registration of Aggregated Members served by Suppliers of Last Resort with the Central Registration Body shall be governed by the following:</u></p> <p><u>2.2.1 An Aggregated Member served by a Supplier of Last Resort pursuant to conditions under Section 3.4.4 of the Retail Rules shall automatically revert to the captive market at the end of the period specified under Section 3.4.4 unless the said Aggregated Member has opted to join an Aggregated Group, pursuant to procedures under Section 3.2.1.7 of the Retail Rules, within the said period of</u></p> | <p>Added Section 2.2 to govern cessation of registration of Aggregated Members registered with CRB</p> <p>Pursuant to ERC Reso No. 04, S. of 2022 Article IV where opt-out of AM may result to transfer to SOLR then eventual reversion to captive market or joining into an Aggregated Group. Since transfer to SOLR means AM will be registered with the CRB, then upon its reversion to captive market or joining into an Aggregated</p> | | | | |

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| | | | <p><u>time.</u></p> <p>2.2.2 The Supplier of Last Resort shall coordinate with the Retail Aggregator, the Network Service Provider and the Retail Metering Services Provider and initiate the cessation of registration of the Aggregated Member by providing a notice to the Central Registration Body in writing which shall, among other things, specify the date on which the Aggregated Member shall cease to be registered, which date shall not exceed the end of the period specified under Section 3.4.4 of the Retail Rules.</p> | <p>Group, it should be ceased to be registered with the CRB.</p> <p>ERC Reso No. 04, S. of 2022 does not provide specific procedures for cessation of registration of AMs. Given that it is the SOLR who would know whether the AM has reverted to captive market or joined an Aggregated Group, it should be the one to initiate cessation of registration with the CRB. On the part of CRB, it is proposed that no other</p> | | | | |

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| | | | <p>2.2.3 <u>The cessation shall be effective on the date stated in the notice submitted by the incumbent Supplier of Last Resort or on such other date as may be notified by the Central Registration Body which shall not be less than thirty (30) business days from the date the notice was sent by the incumbent Supplier or Supplier of Last Resort.</u></p> <p>2.2.4 <u>Upon submission of the notice of cessation by the Supplier of Last Resort and on the effective date, the Aggregated Member shall cease to be registered as an Aggregated Member with the Central</u></p> | requirements shall be required to effect cessation other than the notice provided by the SOLR. | | | | |

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| | | | <p><u>Registration Body and shall cease all activities relevant to an Aggregated Member.</u></p> <p><u>2.2.5 Notwithstanding cessation of registration, all outstanding obligations and liabilities to the Central Registration Body, including financial liabilities and obligations which may arise under the Retail Rules, of the Aggregated Member shall remain valid and subsisting until fully settled.</u></p> | | | | | |

E. Retail Manual on Market Transactions Procedures

| Retail Manual on Market Transactions Procedures | | | | | | | | |
|---|--------------|--|---|---|----------|---------------------------------------|------------|----------------|
| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | Proposed Amendment (in red) | Rationale | Comments | Proposed Re-wording based on Comments | Proponents | RCC Agreements |
| Please write general comments here, if any. | | | | | | | | |
| INTRODUCTION AND GENERAL GUIDELINES - PURPOSE | Section I -1 | <p>1. PURPOSE</p> <p>Pursuant to Clause 3.2.6 of the <i>Retail Rules</i>, the <i>Central Registration Body</i> shall prepare and publish a <i>Market Manual</i> that sets out in more detail the relevant timelines, requirements, and procedures for carrying out <i>Contestable Customer</i> transactions.</p> <p>This Manual presents the criteria, guidelines, and procedures for the <i>Customer Switching</i> requests from Suppliers, <i>Contestable Customer Relocation</i>, and termination of supply contracts that will be administered by the <i>Central Registration Body</i>.</p> <p>This Manual implements relevant provisions of Chapters 3 of the <i>Retail Rules</i>.</p> | <p>1. PURPOSE</p> <p>Pursuant to Clause 3.2.6 of the <i>Retail Rules</i>, the <i>Central Registration Body</i> shall prepare and publish a <i>Market Manual</i> that sets out in more detail the relevant timelines, requirements, and procedures for carrying out <i>Contestable Customer's and Aggregated Group's</i> transactions.</p> <p>This Manual presents the criteria, guidelines, and procedures for the <i>Customer Switching</i> requests from <u>Retail Electricity Suppliers, and Retail Aggregators, Contestable Customer and Aggregated Group</u> Relocation, and termination of supply contracts that will be administered by the <i>Central Registration Body</i>.</p> <p>This Manual implements relevant provisions of Chapters</p> | To include Retail Aggregation participants under scope of this manual | | | | |

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| | | | 3 of the <i>Retail Rules</i> . | | | | | |
| INTRODUCTION AND GENERAL GUIDELINES – SCOPE OF APPLICATION | Section I -2 | <p>2. SCOPE OF APPLICATION</p> <p>This Manual covers the criteria, guidelines, and procedures for the <i>Customer Switching</i> requests from Suppliers, Contestable Customer Relocation provided in Section 3.2.3 of the <i>Retail Rules</i>, termination of Retail Supply Contracts, and for the Failure of Suppliers in the implementation of retail competition in the <i>WESM</i>.</p> <p><u>The criteria, guidelines and procedures for market transactions involving Suppliers that are Renewable Energy Suppliers and Retail Customers under the Green Energy Option Program are covered by the Retail Manual on Green Energy Option Program Procedures.</u></p> | <p>2. SCOPE OF APPLICATION</p> <p>This Manual covers the criteria, guidelines, and procedures for the <i>Customer Switching</i> requests from <u>Retail Electricity Suppliers, and Retail Aggregators</u>, Contestable Customer <u>and Aggregated Group</u> Relocation provided in Section 3.2.3 of the <i>Retail Rules</i>, termination of Retail Supply Contracts, and for the Failure of Suppliers in the implementation of retail competition in the <i>WESM</i>.</p> <p><u>The criteria, guidelines and procedures for market transactions involving Suppliers that are Renewable Energy Suppliers and Retail Customers under the Green Energy Option Program are covered by the Retail Manual on</u></p> | To include Retail Aggregation participants under scope of this manual | | | | |

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| | | | <u>Green Energy Option Program Procedures.</u> | | | | | |
| INTRODUCTION AND GENERAL GUIDELINES – GENERAL GUIDELINES AND SCOPE | Section I -4 | <p>4. GENERAL GUIDELINES AND SCOPE</p> <p>4.1 The integration of retail competition in the <i>WESM</i> aims to promote competition, customer choice and empowerment and greater efficiency in the power industry and to reflect the true cost of electricity.</p> <p>4.2 Upon commencement of <i>retail competition</i>, all <i>Suppliers</i> and <i>Contestable Customers</i> shall register in the <i>WESM</i>. <i>Contestable Customers</i> directly connected to Distribution systems shall transact with the Central Registration Body and may voluntarily register in the <i>WESM</i> in accordance with Chapter 3 of the <i>Retail Rules</i>. Provided, however, that the <i>Contestable</i></p> | <p>4. GENERAL GUIDELINES AND SCOPE</p> <p>4.1 The integration of retail competition in the <i>WESM</i> aims to promote competition, customer choice and empowerment and greater efficiency in the power industry and to reflect the true cost of electricity.</p> <p>4.2 Upon commencement of <i>retail competition</i>, all <u>Retail Electricity</u> <i>Suppliers</i> and <i>Contestable Customers</i> shall register in the <i>WESM</i>.² <i>Contestable Customers</i> directly connected to Distribution systems shall transact with the Central Registration Body and may voluntarily register in the <i>WESM</i> in accordance with Chapter 3 of the <i>Retail Rules</i>. Provided, however, that</p> | To provide framework for market transactions relating to Retail Aggregation | | | | |

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| | | <p><i>Customers shall have the option to voluntarily register in the WESM as a Direct WESM Member.</i></p> <p>4.3 The <i>Market Operator</i> as the <i>Central Registration Body</i> shall administer retail competition in the <i>WESM</i> and its operations in accordance with the <i>Retail Rules</i>.³ It shall also facilitate <i>Customer Switching</i> between <i>Suppliers</i>.⁴</p> | <p>the <i>Contestable Customers</i> shall have the option to voluntarily register in the <i>WESM</i> as a <i>Direct WESM Member</i>.</p> <p>4.3 The <i>Market Operator</i> as the <i>Central Registration Body</i> shall administer retail competition in the <i>WESM</i> and its operations in accordance with the <i>Retail Rules</i>.³ It shall also facilitate <i>Customer Switching</i> between <i>Suppliers</i>.⁴</p> <p><u>4.4 Upon commencement of retail aggregation, Retail Aggregators shall be allowed to supply electricity to end-users whose aggregate demand within a contiguous area meets the threshold for contestability subject to compliance with the requirements under relevant rules issued by the ERC and this Rules.</u></p> | | | | | |

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| | | | 4.5 Retail Aggregators shall register in the WESM pursuant to Chapter 2 of the Retail Rules while Retail Aggregators and Aggregated Groups shall transact with the Central Registration Body pursuant to Chapter 3 of the Retail Rules. | | | | | |
| CUSTOMER SWITCHING – COVERAGE | Section II - 1 | 1. COVERAGE This Section describes the requirements and procedures that <i>Suppliers, Contestable Customers</i> and the <i>Central Registration Body</i> must meet and follow when submitting and processing a request to switch <i>Suppliers</i> | 1. COVERAGE This Section describes the requirements and procedures that <u>Retail Electricity Suppliers, Retail Aggregators, Contestable Customers, Aggregated Groups</u> and the <i>Central Registration Body</i> must meet and follow when submitting and processing a request to switch <i>Suppliers</i> | To include Retail Aggregation participants under scope of this manual | | | | |
| CUSTOMER SWITCHING – OVERVIEW | Section II - 2 | 2. OVERVIEW 2.1 <i>Customer Switching</i> shall apply to all transfers in <i>Retail Supply Contracts</i> of <i>Contestable Customers</i> from one <i>Supplier</i> to another. These commercial transfers do not involve transfer to a <i>Supplier of Last Resort</i> (SOLR) in case of a <i>Last Resort Supply</i> | 2. OVERVIEW 2.1 <i>Customer Switching</i> shall apply to all transfers in <i>Retail Supply Contracts</i> of <i>Contestable Customers</i> from one <i>Supplier</i> to another. These commercial transfers do not involve transfer to a <i>Supplier of Last Resort</i> (SOLR) in case of a <i>Last Resort</i> | To provide framework for market transactions relating to Retail Aggregation | Under 2.4, Proposed wordings to clarify that the Retail Aggregator certifies its Aggregated Group who has met the Retail Aggregation eligibility criteria. Note: Apply to all | xxx 2.4 Before a Switch Request can be submitted by a Retail Aggregator, <u>who certified its Aggregated Group to have met the eligibility criteria,</u> the following must | | |

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| | | <p>Event.</p> <p>2.2 Customer <i>Switching</i> is only applied to <i>Retail Supply Contracts</i> between <i>Suppliers</i> and <i>Contestable Customers</i>. Bilateral supply contracts of <i>Directly Connected Customers</i> or <i>Suppliers</i> with <i>Generation Companies</i> are covered by the customer enrolment procedures as provided for in the WESM Manual on Registration, Suspension, and De- Registration Criteria and Procedures.</p> <p>2.3 Before a <i>Switch Request</i> can be submitted by a <i>Supplier</i>, the following must be present:</p> <p>2.3.1 A valid <i>Retail Supply Contract</i> between a <i>Supplier</i> and the <i>Contestable Customer</i> for which the request is made; and</p> <p>2.3.2 An existing and valid wheeling service agreement with the relevant <i>Distribution Utility</i> or <i>Network</i></p> | <p>Supply Event.</p> <p>2.2 Customer <i>Switching</i> is only applied to <i>Retail Supply Contracts</i> between <u>Retail Electricity</u> <i>Suppliers</i> and <i>Contestable Customers</i> <u>or between Retail Aggregators and Aggregated Groups</u>. Bilateral supply contracts of <i>Directly Connected Customers</i> or <i>Suppliers</i> with <i>Generation Companies</i> are covered by the customer enrolment procedures as provided for in the WESM Manual on Registration, Suspension, and De- Registration Criteria and Procedures.</p> <p>2.3 Before a <i>Switch Request</i> can be submitted by a <u>Retail Electricity</u> <i>Supplier</i>, the following must be present:</p> <p>2.3.1 A valid <i>Retail Supply Contract</i> between a <u>Retail Electricity</u> <i>Supplier</i> and the <i>Contestable Customer</i> for which the request is made; and</p> <p>2.3.2 An existing and valid</p> | | <p>related clause</p> <p>Under 2.4.3. For clarity, please include a provision that if one of the Aggregated Members has an outstanding balance, no certification shall be issued.</p> | <p>be present: xxx [Proposed wordings] xxx 2.4.3. A certification from the incumbent Retail Aggregator or relevant Distribution Utility that <u>all Aggregated Members of the Aggregated Group does</u> not have any outstanding balance.</p> | | |

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| | | <p><i>Service Provider and a metering services agreement with a registered Retail Metering Services Provider covering the Contestable Customer.</i></p> <p>2.3.3 A certification from the incumbent <i>Supplier</i> or relevant <i>Distribution Utility</i> that the <i>Contestable Customer</i> does not have any outstanding balance.</p> <p><u>2.4 If a Contestable Customer wishes to switch to a Renewable Energy Supplier, the new Renewable Energy Supplier shall submit a switch request in accordance with the procedures under the Retail Manual on Green Energy Option Program Procedures, provided that the end-user is also qualified under applicable laws and issuances to be a GEOP End-User.</u></p> <p><u>The Central Registration Body shall update the registration category of the Contestable Customer at the switch</u></p> | <p>wheeling service agreement with the relevant <i>Distribution Utility</i> or <i>Network Service Provider</i> and a metering services agreement with a registered <i>Retail Metering Services Provider</i> covering the <i>Contestable Customer</i>.</p> <p>2.3.3 A certification from the incumbent Retail Electricity <i>Supplier</i> or relevant <i>Distribution Utility</i> that the <i>Contestable Customer</i> does not have any outstanding balance.</p> <p>2.4 Before a Switch Request can be submitted by a Retail Aggregator, the following must be present:</p> <p>2.4.1 A valid Retail Supply Contract between a Retail Aggregator and the Aggregated Group for which the request is made; and</p> | To be consistent with Retail Rules Clause 3.2.1 | | | | |

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| | | <u>effective date to the Renewable Energy Supplier to a GEOP End- User.</u> | <p><u>2.4.2 An existing and valid wheeling service agreement with the relevant Distribution Utility or Network Service Provider and a metering services agreement with a registered Retail Metering Services Provider covering the Aggregated Group.</u></p> <p><u>2.4.3 A certification from the incumbent Retail Aggregator or relevant Distribution Utility that the Aggregated Group does not have any outstanding balance.</u></p> <p><u>2.5—2.4 If a Contestable Customer wishes to switch to a Renewable Energy Supplier, the new Renewable Energy Supplier shall submit a switch request in accordance with the procedures under the Retail Manual on Green Energy Option Program Procedures, provided that the end-user is also qualified under applicable laws and issuances to be a GEOP End-User.</u></p> <p><u>The Central Registration Body shall update the registration</u></p> | | | | | |

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| | | | <u>category of the Contestable Customer at the switch effective date to the Renewable Energy Supplier to a GEOP End- User.</u> | | | | | |
| CUSTOMER SWITCHING – SWITCHING PROCEDURES | Section II - 3.1 | <p>3.1 Submission and Processing of Switch Request</p> <p>3.1.1 Once all requirements are met, an accomplished switch request form shall be submitted by the new Supplier <u>shall submit the switch request</u> to the Central Registration Body not later than seven (7) working days before the proposed switch effective date. The switch request form shall <u>be electronically filled out and shall</u> include an attestation duly signed by <u>a confirmation by the authorized representatives of the following:</u></p> <p>a) The <i>Supplier</i> and the <i>Contestable</i></p> | <p>3.1 Submission and Processing of Switch Request</p> <p>3.1.1 <u>In the case of switch of Contestable Customers,</u> Once all requirements are met, an accomplished switch request form shall be submitted by the new <u>Retail Electricity</u> Supplier <u>shall submit the switch request</u> to the Central Registration Body not later than seven (7) working days before the proposed switch effective date. The switch request form shall <u>be electronically filled out and shall</u> include an attestation duly signed by <u>a confirmation by the authorized representatives of the</u></p> | To clarify that this Section governs switch procedures for Contestable Customers | <p>Under 3.1.2, To add clause that the Retail Aggregator certifies that the Aggregated Group has met the threshold requirement and is located within contiguous area, among many others.</p> <p>Note: Apply to all related clause</p> <p>In relation to an Aggregated Group's duly authorized representative, we are requesting clarification from ERC whether Aggregated Groups would need to formally organize</p> | | | |

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| | | <p><i>Customer</i> of the existence of a <i>retail supply contract</i> between the two parties, and the term of the <i>retail supply contract</i> including the effectivity dates;</p> <p>b) The <i>Supplier</i> or the <i>Contestable Customer</i>, as applicable, and the relevant <i>Distribution Utility or Network Service Provider</i> of the existence of a valid wheeling service agreement covering the <i>Contestable Customer</i>;</p> <p>c) The <i>Supplier</i> or the <i>Contestable Customer</i>, as applicable, and the registered <i>Retail Metering Services Provider</i> of the existence of a valid metering services</p> | <p>following:</p> <p>c) The <i>Supplier</i> and the <i>Contestable Customer</i> of the existence of a <i>retail supply contract</i> between the two parties, and the term of the <i>retail supply contract</i> including the effectivity dates;</p> <p>d) The <i>Supplier</i> or the <i>Contestable Customer</i>, as applicable, and the relevant <i>Distribution Utility or Network Service Provider</i> of the existence of a valid wheeling service agreement covering the <i>Contestable Customer</i>;</p> <p>e) The <i>Supplier</i> or the <i>Contestable Customer</i>, as applicable, and the registered <i>Retail</i></p> | | <p>themselves. We note that the “appropriate documentation” to be required from Aggregated Groups will depend on response of ERC.</p> <p>Considering that issuance of the audit software certificate of the system enhancements is internal to IEMOP, it is suggested that the concerned industry participants that will be using the CRSS be notified that said system is already available for use.</p> | | | |

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| | | <p>agreement covering the <i>Contestable Customer</i>; and</p> <p>d) The incumbent <i>Supplier</i> or, if not served by a <i>Supplier</i>, the relevant <i>Distribution Utility</i> that the <i>Contestable Customer</i> has no outstanding balance.</p> <p><u>The <i>Central Registration Body</i> may require submission of appropriate documentation to ensure the authorized representatives have authority to represent their respective organizations.</u></p> | <p><i>Metering Services Provider</i> of the existence of a valid metering services agreement covering the <i>Contestable Customer</i>; and</p> <p>f) The incumbent <i>Supplier</i> or, if not served by a <i>Supplier</i>, the relevant <i>Distribution Utility</i> that the <i>Contestable Customer</i> has no outstanding balance.</p> <p>The <i>Central Registration Body</i> may require submission of appropriate documentation to ensure the authorized representatives</p> | Moved to other section | | | | |

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| | | <p>The <i>Supplier</i> or <i>Contestable Customer</i> registering as a <i>Direct WESM Member</i> shall also submit the projected metering quantities and the percentage that will be purchased from the <i>WESM</i> by the <i>Contestable Customer</i>, as applicable.</p> <p><u>In view of the need for enhancements to the Central Registration and Settlement System (CRSS) to implement the electronic-based switching process, it is understood that the electronic-based switching shall take effect no later than fifteen (15) days from the date of issuance of the audit software certificate of the system enhancements.</u></p> <p>3.1.2 Initial Assessment – The <i>Central Registration Body</i> shall immediately evaluate the switch application for completeness of requirements in</p> | <p>have authority to represent their respective organizations.</p> <p>The <i>Supplier</i> or <i>Contestable Customer</i> registering as a <i>Direct WESM Member</i> shall also submit the projected metering quantities and the percentage that will be purchased from the <i>WESM</i> by the <i>Contestable Customer</i>, as applicable.</p> <p>3.1.2 In the case of switch of Aggregated Groups, once all requirements are met, the new Retail Aggregator shall submit the switch request to the Central Registration Body not later than seven (7) working days before the proposed switch effective date. The switch request form shall be electronically filled</p> | Added section to govern switch procedures for Aggregated Groups consistent with Section 3.2.2 of the Retail Rules | | | | |

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| | | <p>accordance with <i>Retail Rules Clause 3.2.2.1</i>. The <i>Central Registration Body</i> shall notify the requesting <i>Supplier</i> and the <i>Contestable Customer</i>, applicable, on the status and further requirements, if any, such as prudential requirement, for the approval of switch request, within two (2) <i>working days</i> from the receipt of <i>switch request</i>.</p> <p>3.1.3 Approval of Switch Request – The <i>Central Registration Body</i> shall verify that all conditions set out in <i>Retail Rules Clause 3.2.2.1 to 3.2.2.3</i>, and <i>Section II-3.1.1</i> of this <i>Market Manual</i> are met. and verify the membership type of the <i>Contestable Customer</i> whether or</p> | <p><u>out and shall include a confirmation by the authorized representatives of the following:</u></p> <p>a) <u>The <i>Retail Aggregator and the Aggregated Group</i> as regards the existence of a retail supply contract between the two parties, and the term of the retail supply contract including the effective dates;</u></p> <p>b) <u>The <i>Retail Aggregator or the Aggregated Group</i>, as applicable, and the relevant Distribution Utility or Network Service Provider as regards the</u></p> | | | | | |

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| | | <p>not it voluntarily registered as a <i>Direct WESM Member</i>. Based on the foregoing and subject to compliance with <i>prudential requirements</i>, the <i>Central Registration Body</i> will be able to confirm whether the switch is to take effect and when it will take effect.</p> <p>3.1.3.1 Contestable Customer is registered as <i>Direct WESM Member</i>:</p> <p>xxx</p> <p>3.1.3.2 Contestable Customer is not a <i>WESM Member</i>:</p> <p>xxx</p> <p>d) The <i>Contestable Customer</i> shall be responsible for</p> | <p><u>existence of a valid wheeling service agreement covering the Aggregated Group:</u></p> <p>c) <u>The <i>Retail Aggregator</i> or the <i>Aggregated Group</i>, as applicable, and the registered <i>Retail Metering Services Provider</i> as regards the existence of a valid metering services agreement covering the <i>Aggregated Group</i>; and</u></p> <p>d) <u>The incumbent <i>Retail Aggregator</i> or, if not served by a <i>Retail Aggregator</i>, the relevant</u></p> | | | | | |

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| | | <p>ensuring that it has fully complied with its obligations to the incumbent <i>Supplier</i> and Direct WESM Member counterparty, and the new <i>Supplier</i>, including but not limited to the payment of outstanding obligations and posting of security deposits.</p> <p>Compliance with such requirements will not be verified by the <i>Central Registration Body</i> and are not pre-requisites to its confirmation of the switch.</p> | <p><u><i>Distribution Utility that the Aggregated Group has no outstanding balance.</i></u></p> <p><u>3.1.3</u> <u><i>The Central Registration Body may require submission of appropriate documentation to ensure the authorized representatives have authority to represent their respective organizations.</i></u></p> <p><u>3.1.4</u> <u><i>In view of the need for enhancements to the Central Registration and Settlement System (CRSS) to implement the electronic-based switching process, it is understood that the electronic-based switching shall take effect no later than fifteen (15) days from the date of</i></u></p> | <p>Moved from Section 3.1.1</p> <p>Moved from Section 3.1.1</p> | | | | |

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| | | | <p><u>issuance of the audit software certificate of the system enhancements.</u></p> <p>3.1.5 3.1.2 Initial Assessment</p> <p>– The <i>Central Registration Body</i> shall immediately evaluate the switch application for completeness of requirements in accordance with <i>Retail Rules Clause 3.2.2.1</i>. The <i>Central Registration Body</i> shall notify the requesting <i>Supplier</i> and the <i>Contestable Customer</i> <u>or the Aggregated Group</u>, applicable, on the status and further requirements, if any, such as prudential requirement, for the approval of switch request, within two (2) <i>working days</i> from the receipt of <i>switch request</i>.</p> <p>3.1.6 3.1.3 Approval of Switch Request – The</p> | Include Aggregated Group | | | | |

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| | | | <p><i>Central Registration Body</i> shall verify that all conditions set out in <i>Retail Rules</i> Clause 3.2.2.1 to 3.2.2.3, and Section II-3.1.1 <u>or Section II-3.1.2</u> of this <i>Market Manual</i> are met. <u>For switching of Contestable Customers, the Central Registration Body and shall</u> verify the membership type of the <i>Contestable Customer</i> whether or not it voluntarily registered as a <i>Direct WESM Member</i>. Based on the foregoing and subject to compliance with <i>prudential requirements</i>, the <i>Central Registration Body</i> will be able to confirm whether the switch is to take effect and when it will take effect.</p> <p><u>3.1.6.1</u> 3.1.3.4 Contestable Customer</p> | To clarify that verification of membership as Direct WESM Member is only applicable to CCs | | | | |

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| | | | <i>Registration Body</i> and are not pre-requisites to its confirmation of the switch. | | | | | |
| TERMINATION OF SUPPLY CONTRACTS | Section IV-2.1 | 2.1 Types of Termination of Supply Contracts 2.1.1 Non-renewal – If the incumbent <i>Supplier</i> does not intend to renew the supply contract upon its expiration, the <i>Supplier</i> shall send a notice of non-renewal to the <i>Contestable Customer</i> the <i>Central Registration Body</i> within thirty (30) calendar days prior to the expiration of the said supply contract. 2.1.2 Pre-termination – If the incumbent <i>Supplier</i> intends | 2.1 Types of Termination of Supply Contracts of <u>Contestable Customers and Aggregated Groups</u> 2.1.1 Non-renewal – If the incumbent <i>Supplier</i> does not intend to renew the supply contract upon its expiration, the <i>Supplier</i> shall send a notice of non-renewal to the <i>Contestable Customer</i> the <i>Central Registration Body</i> within thirty (30) calendar days prior to the expiration of the said supply contract. 2.1.2 Pre-termination | To specify that provisions under 2.1 are applicable to CCs and AGs | | | | |

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| | | to terminate the contract prior to the expiration of its term, the <i>Supplier</i> shall send a notice of pre- termination to the <i>Contestable Customer</i> in accordance with the terms specified in the contract to the <i>Central Registration Body</i> and to the relevant <i>Network Service Provider</i> and <i>Retail Metering Services Provider</i> . | – If the incumbent <i>Supplier</i> intends to terminate the contract prior to the expiration of its term, the <i>Supplier</i> shall send a notice of pre- termination to the <i>Contestable Customer</i> in accordance with the terms specified in the contract to the <i>Central Registration Body</i> and to the relevant <i>Network Service Provider</i> and <i>Retail Metering Services Provider</i> . | | | | | |
| TERMINATION OF SUPPLY CONTRACTS | Section IV-2.2 | 2.2 Options for Affected Contestable Customer in case of Termination of Supply Contract 2.2.1 Switch option for | 2.1 Options for Affected Contestable Customer <u>or Aggregated Group</u> in case of Termination of Supply Contract | To specify that provisions under 2.2 are applicable to CCs and AGs | | | | |

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| | | <p>Non-renewal or pre-termination – In case of non-renewal or pre-termination, the <i>Contestable Customer</i> shall switch to a new <i>Supplier</i> in accordance with the requirements and procedures set out in Clause 3.2.2 of the <i>Retail Rules</i>.</p> <p>2.2.2 A <i>Contestable Customer</i> who is registered as a <i>Direct WESM Member</i> shall post securities to satisfy the <i>Prudential Requirements</i> set out in the <i>WESM Rules</i>.</p> | <p>2.1.1 Switch option for Non-renewal or pre-termination – In case of non-renewal or pre-termination, the <i>Contestable Customer</i> <u>or</u> Aggregated Group shall switch to a new <i>Supplier</i> in accordance with the requirements and procedures set out in Clause 3.2.2 of the <i>Retail Rules</i>.</p> <p>2.1.2 A <i>Contestable Customer</i> who is registered as a <i>Direct WESM Member</i> shall post securities to satisfy the <i>Prudential Requirements</i> set out in the <i>WESM Rules</i>.</p> | | | | | |
| TERMINATION OF SUPPLY CONTRACTS | Section IV-2.3 | 2.3 If the <i>Contestable Customer</i> is not a <i>Direct WESM Member</i> and it fails | 2.3 If the <i>Contestable Customer</i> <u>that</u> is not a <i>Direct WESM Member</i> <u>or</u> | To specify that provisions under 2.3 are | | | | |

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| | | <p>to successfully switch to another <i>Supplier</i> prior to the expiration of the <i>Retail Supply Contract</i>, the original <i>Supplier</i> shall:</p> <p>2.3.1 Initiate the disconnection of said <i>Contestable Customer</i> following prevailing rules and procedures for disconnection; and</p> <p>2.3.2 Notify the <i>Central Registration Body</i> that it has initiated disconnection procedures.</p> | <p><u>an Aggregated Group</u> and it fails to successfully switch to another <i>Supplier</i> prior to the expiration of the <i>Retail Supply Contract</i>, the original <i>Supplier</i> shall:</p> <p>2.3.1 Initiate the disconnection of said <i>Contestable Customer</i> <u>or Aggregated Group</u> following prevailing rules and procedures for disconnection; and</p> <p>2.3.2 Notify the <i>Central Registration Body</i> that it has initiated disconnection procedures.</p> | applicable to CCs and AGs | | | | |
| TERMINATION OF SUPPLY CONTRACTS | (new) | (new) | <u>2.4 Conditions for Termination of Supply Contracts of Aggregated Members</u> | To include provisions for termination of supply | | | | |

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| | | | <p>2.4.1 <u>Mutual Agreement between Parties– The Aggregated Member may terminate its contract with the Retail Aggregator subject to the parties' mutual agreement and in accordance with the terms of their respective contract.</u></p> <p>2.4.2 <u>Acts of Default – The Aggregated Member shall have the right to terminate its contract when the Retail Aggregator commits any act of default as listed in Section 3.4.3.1 and Section 3.4.4.1 of the Retail Rules.</u></p> | contracts of AMs consistent with Article IV of ERC Reso. No. 04, Series of 2022 | <p></p> <p>The reference to Section 3.4.3.1 is incorrect since this refers to Last Resort Supply Events only, and not acts of default under the Retail Aggregation Rules. Similar to comment earlier, Section 3.4.4.1 of the Retail Rules is not the act of default contemplated under Section 6, Article IV of the Retail Aggregation Rules.</p> | | | |
| TERMINATION OF SUPPLY CONTRACTS | (new) | (new) | 2.5 <u>The Aggregated Member shall inform its Retail Aggregator no later than thirty (30) days prior to the</u> | To include provisions for termination of | | | | |

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| | | | <u>intended opt-out period, to enable it to contract with a new Retail Aggregator pursuant to Section 3.2.1.8 of the Retail Rules or to be allowed to revert to being a Captive End-User.</u> | supply contracts of AMs consistent with Article IV of ERC Reso. No. 04, Series of 2022 | | | | |
| TERMINATION OF SUPPLY CONTRACTS – PROCEDURES | Section IV.3.1 | <p>3.1 Submission of Notices</p> <p>3.1.1 Notice of Non-renewal – The <i>Supplier</i> shall send the notice to the <i>Contestable Customer</i> and the <i>Central Registration Body</i> within thirty (30) <i>working days</i> prior to the expiration of the said supply contract.</p> <p>3.1.2 Notice of Pre-termination – The incumbent <i>Supplier</i> shall send a prior notice of termination to the <i>Contestable Customer</i> in accordance with the terms specified in the contract to the <i>Central Registration Body</i> and</p> | <p>3.1 Submission of Notices for Termination of Supply Contracts of Contestable Customers and Aggregated Groups</p> <p>3.1.1 Notice of Non-renewal – The <i>Supplier</i> shall send the notice to the <i>Contestable Customer</i> <u>or an Aggregated Group</u> and the <i>Central Registration Body</i> within thirty (30) <i>working days</i> prior to the expiration of the said supply contract.</p> <p>3.1.2 Notice of Pre-termination – The incumbent <i>Supplier</i> shall send a prior notice of termination to the <i>Contestable Customer</i></p> | To specify that provisions under 3.1 are applicable to CCs and AGs | | | | |

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| | | to the relevant <i>Network Service Provider</i> and <i>Metering Service Provider</i> . | <u>or an Aggregated Group</u> in accordance with the terms specified in the contract to the <i>Central Registration Body</i> and to the relevant <i>Network Service Provider</i> and <i>Metering Service Provider</i> . | | | | | |
| TERMINATION OF SUPPLY CONTRACTS – PROCEDURES | Section IV.3.2 | <p>3.2 Procedures for Non-renewal or Termination</p> <p>The <i>Central Registration Body</i> shall ensure that the following conditions are satisfied before confirming the termination of the contract.</p> <p>3.2.1 Switch to a New Supplier – If a <i>Contestable Customer</i> switches to a new <i>Supplier</i>, the following procedures shall apply:</p> <p>a) A new <i>Supplier</i> shall submit a switch request to</p> | <p>3.2 Procedures for Non-renewal or Termination of <u>Supply Contracts of Contestable Customers and Aggregated Groups</u></p> <p>The <i>Central Registration Body</i> shall ensure that the following conditions are satisfied before confirming the termination of the contract.</p> <p>3.2.1 Switch to a New Supplier – If a <i>Contestable Customer</i> <u>or an Aggregated Group</u> switches to a new <i>Supplier</i>, the following procedures shall apply:</p> | To specify that provisions under 3.2 are applicable to CCs and AGs | | | | |

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| | | <p>the <i>Central Registration Body</i> following the procedures for switching;</p> <p>b) <i>Central Registration Body</i> shall process the Switch Request in accordance with the switching procedures of this Manual;</p> <p>c) Once the switch is successfully approved and implemented, the <i>Central Registration Body</i> shall confirm the termination of the previous <i>Retail Supply Contract</i>; and</p> <p>d) Within two (2) <i>working days</i> of confirming the termination above, the <i>Central Registration Body</i></p> | <p>e) A new <i>Supplier</i> shall submit a switch request to the <i>Central Registration Body</i> following the procedures for switching;</p> <p>f) <i>Central Registration Body</i> shall process the Switch Request in accordance with the switching procedures of this Manual;</p> <p>g) Once the switch is successfully approved and implemented, the <i>Central Registration Body</i> shall confirm the termination of the previous <i>Retail Supply Contract</i>; and</p> <p>h) Within two (2) <i>working days</i> of</p> | | | | | |

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| | | <p>shall send a notification letter to the previous <i>Supplier</i>, <i>Contestable Customer</i> and its new <i>Supplier</i>.</p> <p>xxx</p> | <p>confirming the termination above, the <i>Central Registration Body</i> shall send a notification letter to the previous <i>Supplier</i>, <i>Contestable Customer</i> <u>or an Aggregated Group</u> and its new <i>Supplier</i>.</p> <p>xxx</p> | | | | | |
| TERMINATION OF SUPPLY CONTRACTS – PROCEDURES | (new) | (new) | <p>3.3 <u>Submission of Notices and Procedures for Termination of Supply Contracts of Aggregated Members</u></p> <p>3.3.1 <u>The Aggregated Member shall inform its Retail Aggregator no later than thirty (30) days prior to the intended opt-out period, to enable it to contract with a new Retail Aggregator pursuant to Section 3.2.1.8 of</u></p> | To include provisions for termination of supply contracts of AMs consistent with Article IV of ERC Reso. No. 04, Series of 2022 | | | | |

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| | | | <p>3.3.2 <u>the Retail Rules or to be allowed to revert to being a Captive End-User.</u></p> <p><u>If the notification was made less than thirty (30) days, the Aggregated Member shall be served by a Supplier of Last Resort for a maximum period of ninety (90) days pursuant to procedures under Section 3.4 of the Retail Rules. The said Aggregated Member shall be automatically reverted to the Captive Market at the end of such period unless the said Member has opted to join another Aggregated Group, pursuant to procedures under Section 3.2.1.8 of the Retail Rules.</u></p> | | | | | |

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| | | | <p>3.3.3 <u>within the said period of time. Within five (5) days from receipt of Notice from the Aggregated Member, the Retail Aggregator shall notify the Central Registration Body, the concerned Network Service Provider and the Supplier of Last Resort, as applicable, that such Aggregated Member has given notice that it has opted-out or terminated its contract with the concerned Retail Aggregator.</u></p> <p>3.3.4 <u>If the reason for opting out is due to act of default which results in the termination of all the contracts with the Aggregated Members in the Aggregated</u></p> | | | | | |

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| | | | <p><u>Group, each Aggregated Member shall be notified by the Retail Aggregator of the termination of the retail supply contract, within five (5) days from the first notice of the Aggregated Member.</u></p> <p>3.3.5 <u>Should an opt-out of an Aggregated Member result in the demand of the Aggregated Group falling below the required threshold level, the status of contestability shall not be affected unless it is discovered that the formation of the Aggregated Group and/or the corresponding changes in membership are attended by fraud or deceit. The status of</u></p> | | <p>Similar to our earlier comment –</p> <p>This provision was lifted from Section 9, Article IV of the Retail Aggregation Rules. However, it is not aligned with the Rules.</p> <p>Under Section 9, Article IV, <u>there are two instances being contemplated</u>: 1.) opt-out of an Aggregated Member [Section 4], and 2.) termination by an Aggregated Member of the contract due to a</p> | <p>Should an opt-out of an Aggregated Member <u>or termination by the Aggregated Member of the contract due to a Retail Aggregator's Act of Default</u> result in the demand of the Aggregated Group falling below the required threshold level, the status of contestability shall not be affected unless it is discovered that the formation of the Aggregated Group and/or the corresponding</p> | | |

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| | | | <u>contestability shall remain only during the term of the original contract/s. After which, the Retail Aggregator shall initiate the reversion of the Aggregated Group to the captive market pursuant to procedures under Section 3.5 of the Retail Rules.</u> | | <p>Retail Aggregator's act of default [Section 6].</p> <p>The same provision also does not provide that the Retail Aggregator shall initiate the reversion of the Aggregated Group to the captive market.</p> <p>We suggest that this provision be revised to align with the Retail Aggregation Rules.</p> | <p>changes in membership are attended by fraud or deceit. The status of contestability shall remain only during the term of the original contract/s. After which, the Retail Aggregator shall initiate the reversion of the Aggregated Group to the captive market pursuant to procedures under Section 3.5 of the Retail Rules.</p> | | |
| TRANSFER TO SUPPLIER OF LAST RESORT - COVERAGE | Section V.1 | 1. COVERAGE This section establishes the requirements and procedures for implementing and approving, if necessary, the transfer of <i>Contestable Customers</i> , affected by a <i>Last Resort Supply Event</i> to a SOLR. | 1. COVERAGE This section establishes the requirements and procedures for implementing and approving, if necessary, the transfer of <i>Contestable Customers</i> , <u><i>Aggregated Groups and Aggregated Members</i></u> affected by a <i>Last Resort Supply Event</i> to a SOLR. | To include Aggregated Groups and Members under provisions for transfer to SOLR | | | | |
| TRANSFER TO SUPPLIER OF LAST RESORT - | Section V.2 | 2. OVERVIEW | 2. OVERVIEW OF TRANSFER TO SOLR OF CONTESTABLE CUSTOMERS AND | To specify that this Section applies to CCs | | | | |

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| OVERVIEW | | | <u>AGGREGATED GROUPS</u> | and AGs | | | | |
| TRANSFER TO SUPPLIER OF LAST RESORT - OVERVIEW | (new) | (new) | <p>2.2 <u>An Aggregated Group shall be transferred to the Supplier of Last Resort upon occurrence of any one of the following last resort events:</u></p> <ul style="list-style-type: none"> i) <u>The Retail Aggregator has ceased to operate;</u> j) <u>The Retail Aggregator's license or authorization has been revoked by the ERC;</u> k) <u>The Retail Aggregator is no longer permitted to trade in the WESM due to suspension, deregistration or cessation of membership;</u> l) <u>The agreements for transmission, wheeling or distribution services with the relevant Network Service Provider or Distribution Utility have been terminated;</u> m) <u>Excess billing of the contracted electricity rate by the Retail Aggregator unless measures were immediately taken by</u> | To include last resort supply events for AGs pursuant to Article IV Section 6 of the ERC Rules | Please correct the numbering of the subsections. | | | |

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| | | | <p><u>the Retail Aggregator upon discovery of error;</u></p> <p>n) <u>Non-payment of Retail Aggregator on its obligation to the DU, Generation Company and WESM, among others;</u></p> <p>o) <u>Final Decision issued by any Court in the Philippines convicting the Retail Aggregator of any crime or offense involving fraud or deceit; or</u></p> <p>p) <u>Any other event which the ERC may deem as a last resort supply event.</u></p> | | | | | |
| TRANSFER TO SUPPLIER OF LAST RESORT - OVERVIEW | Section V.2.2 | 2.2 When the Central Registration Body determines <u>receives notice of</u> the occurrence of any of the aforementioned last resort events, a notification shall be sent to the affected <i>Contestable Customer/s</i> , the SOLR, the defaulting <i>Supplier</i> , if practicable, of the occurrence and the effective date of the transfer to the SOLR. <u>Within two (2) working days from receiving notice of the last resort event,</u> ¶the <i>Contestable Customer</i> shall notify the Central Registration Body and the SOLR | 2.3—2.2 When the Central Registration Body determines <u>receives notice of</u> the occurrence of any of the aforementioned last resort events, a notification shall be sent to the affected <i>Contestable Customer/s</i> <u>or Aggregated Group</u> , the SOLR, the defaulting <i>Supplier</i> , if practicable, of the occurrence and the effective date of the transfer to the SOLR. <u>Within two (2) working days from receiving notice of the last resort event,</u> ¶the <i>Contestable Customer</i> <u>or Aggregated Group</u> shall notify | To specify that this Section applies to CCs and AGs | | | | |

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| | | <p>if it chooses to be served by the latter.</p> <p>For the Grid-Connected Contestable Customer that is an <i>Indirect WESM Member</i> and the defaulting <i>Supplier</i> is its <i>Direct WESM Member counterparty</i>, the <i>Contestable Customer</i> shall notify the <i>Central Registration Body</i> and the SOLR if it chooses to be served by the latter.</p> <p>For the <i>Contestable Customer</i> that is an <i>Indirect WESM Member</i> and the defaulting <i>Supplier</i> is not its <i>Direct WESM Member counterparty</i> (due to existence of multiple suppliers), the availment of SOLR service must be approved first by the <i>Contestable Customer's Direct WESM Member counterparty</i> before the <i>Central Registration Body</i> and the SOLR are notified.</p> <p>A <i>Contestable Customer</i> that is a <i>Direct WESM Member</i> may choose a) to be served by the SOLR following the timeline set out in Clause</p> | <p>the <i>Central Registration Body</i> and the SOLR if it chooses to be served by the latter.</p> <p>For the Grid-Connected Contestable Customer or Aggregated Group that is an <i>Indirect WESM Member</i> and the defaulting <i>Supplier</i> is its <i>Direct WESM Member counterparty</i>, the <i>Contestable Customer or Aggregated Group</i> shall notify the <i>Central Registration Body</i> and the SOLR if it chooses to be served by the latter.</p> <p>For the <i>Contestable Customer or Aggregated Group</i> that is an <i>Indirect WESM Member</i> and the defaulting <i>Supplier</i> is not its <i>Direct WESM Member counterparty</i> (due to existence of multiple suppliers), the availment of SOLR service must be approved first by the <i>Contestable Customer's or Aggregated Group's Direct WESM Member counterparty</i> before the <i>Central Registration Body</i> and the SOLR are notified.</p> | | | | | |

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| | | <p>3.4.3; or, b) not to be served by the SOLR. If it chooses the latter, the <i>Contestable Customer</i> shall submit additional securities required by the <i>Market Operator</i> to fully satisfy the prudential requirements set out in the <i>WESM Rules</i>.</p> <p>The Central Registration Body shall be notified by the SOLR and the <i>Contestable Customer</i> of the transfer no later than forty eight (48) hours after being notified of the occurrence of the <i>Last Resort Supply Event</i>.</p> | <p>A <i>Contestable Customer</i> that is a <i>Direct WESM Member</i> may choose a) to be served by the SOLR following the timeline set out in Clause 3.4.3; or, b) not to be served by the SOLR. If it chooses the latter, the <i>Contestable Customer</i> shall submit additional securities required by the <i>Market Operator</i> to fully satisfy the prudential requirements set out in the <i>WESM Rules</i>.</p> <p>The Central Registration Body shall be notified by the SOLR and the <i>Contestable Customer</i> of the transfer no later than forty eight (48) hours after being notified of the occurrence of the <i>Last Resort Supply Event</i>.</p> | | | | | |
| TRANSFER TO SUPPLIER OF LAST RESORT - PROCEDURES | Section V.3 | <p>3. PROCEDURES</p> <p><u>3.1 Terms of Supply Contract and Applicable Rates - Within one (1) working day upon receiving notice from the Contestable Customer. the Supplier of Last Resort</u></p> | <p>3. PROCEDURES <u>FOR TRANSFER TO SOLR OF CONTESTABLE CUSTOMERS AND AGGREGATED GROUPS</u></p> <p><u>3.1 Terms of Supply Contract and Applicable Rates - Within one (1) working day upon receiving notice from the Contestable Customer</u></p> | To specify that this section is applicable to CCs and AGs | | | | |

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| | | <p>shall inform the Contestable Customer of the terms of its supply contract and the applicable rates.</p> <p>3.2 3.4Submission and Processing of Switch Request (Switch to SOLR) – Once all parties agree, an accomplished switch request form shall be submitted by the SOLR to the Central Registration Body no later than forty-eight (48) hours two (2) working days after being notified of the occurrence of the Last Resort Supply Event. The switch request form shall include an attestation of the agreement duly signed by the SOLR and the Contestable Customer be in accordance with the applicable requirements under Clause 3.2.2 and 3.2.3</p> | <p>or Aggregated Group, the Supplier of Last Resort shall inform the Contestable Customer or Aggregated Group of the terms of its supply contract and the applicable rates.</p> <p>3.2 3.4Submission and Processing of Switch Request (Switch to SOLR) – Once all parties agree, an accomplished switch request form shall be submitted by the SOLR to the Central Registration Body no later than forty-eight (48) hours two (2) working days after being notified of the occurrence of the Last Resort Supply Event. The switch request form shall include an attestation of the agreement duly signed by the SOLR and the Contestable Customer be in accordance with the</p> | | | | | |

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| | | <p>of the Retail Rules and Section II.3 of this manual.</p> <p>3.3 3.2Assessment and Approval – Upon receipt of the request, the <i>Central Registration Body</i> shall evaluate the form <u>in accordance with the procedures under Clause 3.2.2 and 3.2.3 of the Retail Rules and Section II.3 of this manual.</u> The <i>Central Registration Body</i> shall immediately notify the SOLR to provide the prudential requirements within three (3) working days from receipt of the switch request/notification.</p> <p>3.4 3.3Disconnection – The <i>Central Registration Body</i> shall initiate disconnection of a <u>Contestable Customer or Aggregated Group</u> based on the following grounds:</p> | <p><u>applicable requirements under Clause 3.2.2 and 3.2.3 of the Retail Rules and Section II.3 of this manual.</u></p> <p>3.3 3.2Assessment and Approval – Upon receipt of the request, the <i>Central Registration Body</i> shall evaluate the form <u>in accordance with the procedures under Clause 3.2.2 and 3.2.3 of the Retail Rules and Section II.3 of this manual.</u> The <i>Central Registration Body</i> shall immediately notify the SOLR to provide the prudential requirements within three (3) working days from receipt of the switch request/notification.</p> <p>3.4 3.3Disconnection – The <i>Central Registration Body</i> shall initiate disconnection of a</p> | | | | | |

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| Title | Section | Provision (in reference to current published version including pending revision pursuant to RCC-RESO-22-07) | Proposed Amendment (in red) | Rationale | Comments | Proposed Re-wording based on Comments | Proponents | RCC Agreements |
| | | <p>a) Failure of the <i>Contestable Customer</i> to give notice within the period set out in the <i>Retail Rules</i>;</p> <p>b) Provision of notice that it elects not to be transferred to a SOLR within the period set out in the <i>Retail Rules</i>; or</p> <p>c) Failure to enter into a contract with the SOLR.</p> | <p><i>Contestable Customer</i> <u>or Aggregated Group</u> based on the following grounds:</p> <p>a) Failure of the <i>Contestable Customer</i> <u>or Aggregated Group</u> to give notice within the period set out in the <i>Retail Rules</i>;</p> <p>b) Provision of notice that it elects not to be transferred to a SOLR within the period set out in the <i>Retail Rules</i>; or</p> <p>c) Failure to enter into a contract with the SOLR.</p> | | | | | |
| TRANSFER TO SUPPLIER OF LAST RESORT - OVERVIEW | (new) | (new) | <u>4. OVERVIEW OF TRANSFER TO SOLR OF AGGREGATED MEMBERS</u> | To include provisions for transfer to SOLR of AMs consistent with Article IV of | Under 4.1(d), xxx a) Breach of confidentiality regarding the Aggregated | 4.1 An Aggregated Member shall be transferred to the <i>Supplier of Last Resort</i> upon occurrence of any | | |

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| | | | <p>4.1 <u>An Aggregated Member shall be transferred to the Supplier of Last Resort upon occurrence of any one of the following last resort events:</u></p> <p>d) <u>Breach of confidentiality regarding the Aggregated Member's information;</u></p> <p>e) <u>The Aggregated Member failed to provide notification of intent to opt-out thirty (30) days prior to the intended opt-out date pursuant to Section 3.2.8.4 of the Retail Rules;</u></p> <p>or</p> <p>f) <u>Any other event which the ERC may deem as a</u></p> | ERC Reso. No. 04, Series of 2022 | <p><u>Member's information;</u></p> <p>- This is not a Last Resort Supply Event but identified as acts of default by Retail Aggregator. Kindly align wordings with Retail Aggregation Rules.</p> <p>* * *</p> <p>Please correct the numbering of the subsections.</p> <p>Subsections (d) and (e) are not considered as Last Resort Supply Events. Subsection (d) is considered as an "act of default" by the Retail Aggregator under Section 6, Article IV of the Retail Aggregation Rules. Subsection (e), while provided for under Section 4, Article IV of the same rules, does not qualify such an event as a Last Resort Supply</p> | one of the following last resort events | | |

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| | | | <u>last resort supply event.</u> | | Event. Also, are there items a to c because the enumeration starts with d? | | | |
| TRANSFER TO SUPPLIER OF LAST RESORT - OVERVIEW | (new) | (new) | <p><u>5. PROCEDURES FOR TRANSFER TO SOLR OF AGGREGATED MEMBERS</u></p> <p><u>5.1 Subject to procedures for termination of retail supply contracts of Aggregated Members with Retail Aggregators under Section 3.2.8 of the Retail Rules and Section IV of this manual, the Supplier of Last Resort shall submit a switch request in accordance with requirements and procedures under</u></p> | To include provisions for transfer to SOLR of AMs consistent with Article IV of ERC Reso. No. 04, Series of 2022 | | | | |

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| | | | <p><u>Section 3.2.1 and 3.2.2 of the Retail Rules and Section II.3 of this manual to be allowed to provide supply to the Aggregated Member.</u></p> <p><u>5.2 Upon evaluation, the Central Registration Body shall either approve or disapprove the switch request in accordance with procedures under Section 3.2.1 and 3.2.2 of the Retail Rules and Section II.3 of this manual.</u></p> <p><u>5.3 The Aggregated Member shall be served by the</u></p> | | | | | |

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| | | | <u>Supplier of Last Resort for a maximum period of ninety (90) days. The said Aggregated Member shall be automatically reverted to the Captive Market at the end of such period unless the said Member has opted to join an Aggregated Group, pursuant to procedures under Section 3.2.1.7 of the Retail Rules, within the said period of time.</u> | | | | | |

F. Retail Manual on Metering Standards and Procedures

| Retail Manual on Metering Standards and Procedures | | | | | | | | |
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| Please write general comments here, if any. | | | | | | | | |
| Definition of Terms | 1.3.2 | (new) | <u>Virtual Metering Installation. A non-physical metering installation, which represents the aggregate meter data from physical metering installations of Aggregated Members belonging to an Aggregated Group, duly registered with the Central Registration Body.</u> | To define Virtual Metering Installation consistent with provisions of Article VI, Section 7 and 8 of ERC Reso. No, 04, S. of 2022 | | | | |
| Coverage | 2.1 | This section defines the <i>metering installation</i> standards that a Contestable Retail Customer meter installation must comply with to be eligible for registration in the <i>Wholesale Electricity Spot Market</i> . The section also covers certain | This section defines the <i>metering installation</i> standards that a Contestable Retail Customer meter installation must comply with to be eligible for registration in the <i>Wholesale Electricity Spot Market</i> . <u>For an Aggregated Group, the Retail Metering Services Provider shall designate a virtual</u> | To clarify that metering installations referred herein refer to those installed at the Aggregated Member but virtual metering installation refers to point of reference for settlement quantity of Aggregated Group consistent with Article VI, Section 7 and 8 of ERC Reso. No, 04, S. of 2022 Article VI, Section 3 | | | | |

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| | | electrical, dimensional, and mechanical characteristics and designs, and takes into consideration certain safety features of current and inductively-coupled voltage transformers of types generally used in the measurement of electricity associated with revenue metering. | <p><u>metering installation which represents the aggregate meter data from physical metering installations of Aggregated Members belonging to the Aggregated Group. Only the virtual metering installation shall be registered with the Central Registration Body and shall be the basis of the Central Registration Body for accounting and settlement of meter data of the Aggregated Group.</u></p> <p>The section also covers certain electrical, dimensional, and mechanical characteristics and designs, and takes into consideration certain safety features of current and inductively-coupled voltage</p> | of ERC Reso. No, 04, S. of 2022 states that each Aggregated Member shall be installed with an interval meter capable of measuring peak demand and recording and reading 5-minute interval consumption. While specific technical standards are not provided in the resolution, it is proposed that the same standards for interval meters under the Retail MSP manual be applied to metering installations of Aggregated Members | | | | |

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| | | | <p>transformers of types generally used in the measurement of electricity associated with revenue metering.</p> <p><u>The standards for metering installation provided in this Manual shall also apply to metering installations of Aggregated Members, unless otherwise stated or unless the Energy Regulatory Commission prescribes another set of standards through a formal issuance.</u></p> | | | | | |
| GENERAL COMPLIANCE | 2.3 | <p>This Manual supplements the minimum requirements in the <i>Philippine Distribution Code</i> and relevant ERC issuances for metering installations of Contestable Customers Retail Customers. Any <i>metering installation</i> of a</p> | <p>This Manual supplements the minimum requirements in the <i>Philippine Distribution Code</i> and relevant ERC issuances for metering installations of Contestable Customers Retail Customers. Any <i>metering installation</i> of a higher level of</p> | Article VI, Section 3 of ERC Reso. No, 04, S. of 2022 states that each Aggregated Member shall be installed with an interval meter capable of | | | | |

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| | | <p>higher level of accuracy or functionality than the standards in the <i>Philippine Distribution Code</i> and relevant ERC issuances and this standard may also be installed.</p> <p><u>For GEOP end-user, the Retail Metering Services Provider shall install a meter capable of registering energy use and demand recorded at 5-minute intervals. Existing metering installations that are non-compliant with this requirement shall be governed by Section 2.7 of this manual.</u></p> | <p>accuracy or functionality than the standards in the <i>Philippine Distribution Code</i> and relevant ERC issuances and this standard may also be installed.</p> <p><u>For GEOP end-user and Aggregated Members, the Retail Metering Services Provider shall install a meter capable of registering energy use and demand recorded at 5-minute intervals. Existing metering installations that are non-compliant with this requirement shall be governed by Section 2.7 of this manual.</u></p> | measuring peak demand and recording and reading 5-minute interval consumption. | | | | |
| SITE EQUIPMENT IDENTIFICATION NUMBER (SEIN) | 3.3.2 | <p>a) 3.3.2 Metering Installation</p> <p><i>A metering installation shall be numbered</i></p> | <p>b) 3.3.2 Metering Installation</p> <p><i>A metering installation shall be numbered using the following convention:</i></p> | To provide basis for identification of virtual metering installation | | | | |

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| | | <p>using the following convention:</p> <p>WWW-XXXX-YY-CCCC-NN</p> <p>Where: xxx</p> | <p>WWW-XXXX-YY-CCCC-NN</p> <p>Where: xxx</p> <p><u>A virtual metering installation shall be numbered using the following convention:</u></p> <p>c)</p> <p><u>RV-AAABBBBCC-DDDDEEA</u></p> <p><u>Where:</u></p> <p><u>RV</u> <u>representa</u> <u>tion of</u> <u>virtual</u> <u>SEIN for</u> <u>the</u> <u>Aggregat</u> <u>ed Group</u> <u>AAABBBBCC</u> <u>SEIN of grid</u> <u>off-take</u> <u>metering</u> <u>point</u> <u>where</u> <u>Aggregat</u> <u>ed Group</u> <u>is</u> <u>connecte</u> <u>d</u> <u>DDDDEEA</u> <u>unique</u> <u>short</u> <u>name for</u></p> | | | | | |

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| | | | <u>Aggregated Group</u> | | | | | |
| METERS FOR REGISTRATION | 4.3 | <p>d) 4.3 METERS FOR REGISTRATION</p> <p>Main and backup <i>meters</i>, of revenue quality and the same <i>accuracy class</i>, shall be registered.</p> | <p>e) 4.3 METERS FOR REGISTRATION</p> <p>Main and backup <i>meters</i>, of revenue quality and the same <i>accuracy class</i>, shall be registered.</p> <p><u>For an Aggregated Group, the Retail Metering Services Provider shall designate a virtual metering installation which represents the aggregate meter data from physical metering installations of Aggregated Members belonging to the Aggregated Group. Only the virtual metering installation shall be registered with the Central Registration Body and shall be the basis of the Central</u></p> | To govern registration of virtual metering installations consistent with provisions of Article VI, Section 7 and 8 of ERC Reso. No, 04, S. of 2022 | | | | |

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| | | | <u>Registration Body for accounting and settlement of meter data of the Aggregated Group.</u> | | | | | |
| Submission of Application Form and Pertinent Documents | 4.4.1 | <p>If the <i>metering installation</i> of a Contestable Retail Customer subject to a <i>switch request</i> is not yet registered with the <i>Central Registration Body</i>, <u>the prospective Supplier shall initiate the registration by creating a Metering Installation Registration Form (MIRF) request in the Central Registration and Settlement System. This is provided that all pre-switching requirements have been complied by the Supplier. In turn,</u> its <i>Retail Metering Services Provider</i>, shall initiate the registration of the <i>metering installation</i>.</p> <p>To initiate the registration of a <i>metering installation</i> of a Contestable Retail Customer, its <i>Retail</i></p> | <p>If the <i>metering installation</i> of a Contestable Retail Customer subject to a <i>switch request</i> is not yet registered with the <i>Central Registration Body</i>, <u>the prospective Supplier shall initiate the registration by creating a Metering Installation Registration Form (MIRF) request in the Central Registration and Settlement System. This is provided that all pre-switching requirements have been complied by the Supplier. In turn,</u> its <i>Retail Metering Services Provider</i>, shall initiate the registration of the <i>metering installation</i>.</p> <p>To initiate the registration of a <i>metering installation</i> of a Contestable Retail Customer, its <i>Retail Metering Services Provider</i>, on behalf of the Supplier or Contestable Retail</p> | To update metering installation registration requirements considering some existing requirements are not applicable to virtual metering installations | We suggest the following rewording to the list of documents to be submitted by RMSPs via the CRSS, in order to include alternative meter test reports, which are aligned with ERC's established Procedures on the Meter Testing and Meter Sampling Plan, under the ERC's Meter Test and Maintenance Rules. | <p>c) d) Meter Testing</p> <p>For Contestable Retail Customers that are not Aggregated Groups and with having an average monthly peak demand of 1MW and above, the Retail Metering Services Provider shall submit all prior test results of its meter within the last two (2) years, <u>or subject to compliance with ERC's Meter Test and Maintenance Rules, under ERC Resolution No. 12, Series of 2009, as amended by ERC Resolution No. 21, Series of 2013;</u> and</p> | | |

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| | | <p>Metering Services Provider, on behalf of the Supplier or Contestable Retail Customer, shall submit the following to the Central Registration Body</p> <p><u>using the Central Registration and Settlement System</u> by courier:</p> <p>a) Accomplished Metering Installation Registration Form (MIRF) per metering point as published in the market information web site signed by both Retail Metering Services Provider and Contestable Customer;</p> <p>b) Load Profile of the metering installation during the previous twelve (12) months as well as its maximum and minimum demand;</p> <p>b) e) Single Line Diagram</p> <p>Simplified Single Line Diagram of the Distribution Utility's network showing the connection of the</p> | <p>Customer, shall submit the following to the Central Registration Body <u>using the Central Registration and Settlement System</u> by courier:</p> <p>a) Accomplished Metering Installation Registration Form (MIRF) per metering point as published in the market information web site signed by both Retail Metering Services Provider and Contestable Customer;</p> <p>b) Load Profile of the metering installation during the previous twelve (12) months as well as its maximum and minimum demand;</p> <p>b) e) Single Line Diagram</p> <p>Simplified Single Line Diagram of the Distribution Utility's network showing the connection of the Contestable <u>Retail Customer's metering point</u> to the default grid off-take metering point and other nearest grid off-take metering points.</p> <p>If the Contestable <u>Retail</u></p> | | | | | |

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| | | <p>Contestable Retail Customer's metering point to the default grid off-take metering point and other nearest grid off-take metering points.</p> <p>If the Contestable Retail Customer is a grid-connected customer, it shall submit the Single Line Diagram showing the connection of the Contestable Retail Customer's metering point to the main grid substation.</p> <p>c) d Meter Testing</p> <p>For Contestable Retail Customers having an average monthly peak demand of 1MW and above, the <i>Retail Metering Services Provider</i> shall submit all prior test results of its <i>meter</i> within the last two (2) years. and</p> <p>e) Pro-forma Agreement between the Contestable Customer or Supplier and its Retail Metering Services Provider; and</p> | <p>Customer is a grid-connected customer, it shall submit the Single Line Diagram showing the connection of the Contestable Retail Customer's metering point to the main grid substation.</p> <p>c) d Meter Testing</p> <p>For Contestable Retail Customers that are not Aggregated Groups and with having an average monthly peak demand of 1MW and above, the <i>Retail Metering Services Provider</i> shall submit all prior test results of its <i>meter</i> within the last two (2) years. and</p> <p>e) Pro-forma Agreement between the Contestable Customer or Supplier and its Retail Metering Services Provider; and</p> <p>g) d f Documentation of other special features of the meter, as applicable.</p> | | | | | |

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| | | f) d) Documentation of other special features of the meter. | | | | | | |
| Metering Data Collection | 5.1 | <p>h) 5.1 COVERAGE</p> <p>Pursuant to <i>Retail Rules</i> Clause 4.4.2.1, the <i>Retail Metering Services Provider</i>, on behalf of its associated <i>Supplier</i> or <i>Contestable</i> <i>Retail</i> Customer, shall retrieve the <i>metering data</i> from the <i>meter</i> and transmit the <i>metering data</i> to the <i>Central Registration Body</i>.</p> <p>The <i>Retail Metering Services Provider</i> shall use all reasonable endeavors to ensure that <i>metering data</i> will be</p> | <p>i) 5.1 COVERAGE</p> <p>Pursuant to <i>Retail Rules</i> Clause 4.4.2.1, the <i>Retail Metering Services Provider</i>, on behalf of its associated <i>Supplier</i> or <i>Contestable</i> <i>Retail</i> Customer, shall retrieve the <i>metering data</i> from the <i>meter</i> and transmit the <i>metering data</i> to the <i>Central Registration Body</i>.</p> <p><u>If the Retail Customer is an Aggregated Group, the Retail Metering Services Provider shall retrieve the metering data from the meter of each Aggregated Member of an Aggregated Group</u></p> | To comply with Article VI, Section 8 of ERC Reso. No, 04, S. of 2022 | | | | |

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| | | <p>transmitted to the <i>metering database</i> of the <i>Central Registration Body</i> from its <i>metering installation</i> pursuant to <i>Retail Rules</i> Clause 4.3.7.1:</p> <p>a) Within the applicable accuracy parameters described in the <i>Philippine Grid Code</i>, the <i>Philippine Distribution Code</i> and relevant <i>Market Manuals</i>; and</p> <p>b) Within the time required for settlement and at a level of availability of at least ninety-nine (99%) per annum or as otherwise agreed between the <i>Central Registration Body</i> and the <i>Retail Metering Services Provider</i>.</p> | <p><u>and aggregate the metering data prior to transmitting to the Central Registration Body pursuant to Retail Rules Clause 4.4.3.</u></p> <p>The <i>Retail Metering Services Provider</i> shall use all reasonable endeavors to ensure that <i>metering data</i> will be transmitted to the <i>metering database</i> of the <i>Central Registration Body</i> from its <i>metering installation</i> pursuant to <i>Retail Rules</i> Clause 4.3.7.1:</p> <p>c) Within the applicable accuracy parameters described in the <i>Philippine Grid Code</i>, the <i>Philippine Distribution Code</i> and relevant <i>Market Manuals</i>; and</p> <p>d) Within the time required for settlement</p> | | | | | |

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| | | This section provides the procedures to be followed by the <i>Central Registration Body, Contestable Retail Customers, Suppliers, and Retail Metering Services Providers</i> in the collection and submission of <i>metering data</i> to the <i>Central Registration Body</i> . | and at a level of availability of at least ninety-nine (99%) per annum or as otherwise agreed between the <i>Central Registration Body</i> and the <i>Retail Metering Services Provider</i> . This section provides the procedures to be followed by the <i>Central Registration Body, Contestable Retail Customers, Suppliers, and Retail Metering Services Providers</i> in the collection and submission of <i>metering data</i> to the <i>Central Registration Body</i> . | | | | | |
| Metering Database | 5.2.1 | 5.2.1 Metering Database Pursuant to <i>Retail Rules</i> Clause 4.5.2.1, the <i>Central Registration Body</i> shall create, maintain and | 5.2.1 Metering Database Pursuant to <i>Retail Rules</i> Clause 4.5.2.1, the <i>Central Registration Body</i> shall create, maintain and administer a <i>metering</i> | To clarify that virtual metering installations shall be included in the metering database | | | | |

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| | | <p>administer a <i>metering database</i>, which shall include a metering register containing information for each <i>metering installation</i> registered with the <i>Central Registration Body</i>.</p> <p>j) xxx</p> <p>k) 5.2.1.3 Access</p> <p>The only entities entitled to have either direct or remote access to <i>metering data</i> on a read-only basis from the <i>metering database</i> or the metering register in relation to a <i>metering point</i> are:</p> <p>l) Each <i>Supplier</i> whose <i>gross energy settlement quantities</i> are determined by reference to quantities of energy</p> | <p><i>database</i>, which shall include a metering register containing information for each <i>metering installation and virtual metering installation</i> registered with the <i>Central Registration Body</i>.</p> <p>x) xxx</p> <p>y) 5.2.1.3 Access</p> <p>The only entities entitled to have either direct or remote access to <i>metering data</i> on a read-only basis from the <i>metering database</i> or the metering register in relation to a <i>metering point</i> are:</p> <p>a) Each <i>Supplier</i> whose <i>gross energy settlement quantities</i> are determined by reference to quantities of energy flowing through that <i>metering point</i>,</p> | | | | | |

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| | | <p>flowing through that <i>metering point</i>,</p> <p>m) The <i>Retail Metering Services Provider</i> who is responsible for the <i>metering installation</i> at that <i>metering point</i>,</p> <p>n) The <i>Central Registration Body</i> and its authorized agents,</p> <p>o) The <i>Market Operator</i> and its authorized agents,</p> <p>p) Any <i>Retail Customer</i> with respect to the <i>metering data</i> in relation to the <i>metering point</i> registered to it,</p> <p>q) Any <i>Distribution Utility</i> with respect to <i>Retail Customers</i> whose facilities are located in its franchise area and for whom said <i>Distribution Utility</i> is not the <i>Retail</i></p> | <p>b) The <i>Retail Metering Services Provider</i> who is responsible for the <i>metering installation</i> or <u>virtual metering installation</u> at that <i>metering point</i>,</p> <p>c) The <i>Central Registration Body</i> and its authorized agents,</p> <p>d) The <i>Market Operator</i> and its authorized agents,</p> <p>e) Any <i>Retail Customer</i> with respect to the <i>metering data</i> in relation to the <i>metering point</i> registered to it,</p> <p>f) Any <i>Distribution Utility</i> with respect to <i>Retail Customers</i> whose facilities are located in its franchise area and for whom said <i>Distribution Utility</i> is not the <i>Retail Metering Services Provider</i>,</p> <p>g) The <i>Market Surveillance Committee</i>,</p> | | | | | |

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| | | <p><i>Metering Services Provider,</i></p> <p>r) The Market Surveillance Committee,</p> <p>s) The Enforcement and Compliance Office,</p> <p>t) The Market Assessment Group,</p> <p>u) The PEM Auditor,</p> <p>v) The Department of Energy, and</p> <p>w) The Energy Regulatory Commission.</p> <p>xxx</p> | <p>h) The Enforcement and Compliance Office,</p> <p>i) The Market Assessment Group,</p> <p>j) The PEM Auditor,</p> <p>k) The Department of Energy, and</p> <p>l) The Energy Regulatory Commission.</p> <p>xxx</p> | | | | | |
| Installation Database | 5.2.2 | <p>z) 5.2.2. Installation Database</p> <p>Pursuant to <i>Retail Rules</i> Clause 4.5.1.1, a <i>Retail Metering Services Provider</i> shall create, maintain and administer an <i>installation</i></p> | <p>aa) 5.2.2. Installation Database</p> <p>Pursuant to <i>Retail Rules</i> Clause 4.5.1.1, a <i>Retail Metering Services Provider</i> shall create, maintain and administer an <i>installation database</i> in relation to all its <i>metering installations</i></p> | To clarify that virtual metering installations shall be included in the installation database | | | | |

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| | | <p>database in relation to all its <i>metering installations</i>.</p> <p>xxx</p> | <p><u>and virtual metering installations.</u></p> <p>xxx</p> | | | | | |
| Collection and Submission Procedure – Daily Process | 5.3.2 | <p>bb) 5.3.2 Daily Process</p> <p>cc) 5.3.2.1 Collection</p> <p>At an interval basis, the <i>meter</i> at the <i>metering point</i> of a Contestable <u>Retail</u> Customer continuously records <i>metering data</i>. Immediately at the end of the <i>trading day</i>, the <i>Retail Metering Services Provider</i> shall collect the <i>metering data</i> and event log of the whole <i>trading day</i> from each <i>meter</i>, identified by its</p> | <p>ff) 5.3.2 Daily Process</p> <p>gg) 5.3.2.1 Collection</p> <p>At an interval basis, the <i>meter</i> at the <i>metering point</i> of a Contestable <u>Retail</u> Customer continuously records <i>metering data</i>. Immediately at the end of the <i>trading day</i>, the <i>Retail Metering Services Provider</i> shall collect the <i>metering data</i> and event log of the whole <i>trading day</i> from each <i>meter</i>, identified by its Recorder ID (SEIN) and Device ID (Serial Number), of all its</p> | To govern procedures for aggregation of meter data consistent with Article VI, Section 8 of ERC Reso. No, 04, S. of 2022 | | | | |

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| | | <p>Recorder ID (SEIN) and Device ID (Serial Number), of all its associated <i>Retail Customers</i> registered under Chapter 2 of the <i>Retail Rules</i>.</p> <p>dd) 5.3.2.2 Submission</p> <p>The <i>Retail Metering Services Provider</i> shall submit the collected <i>metering data</i> of the <i>trading day</i> to the <i>Central Registration Body</i> at 0400H of the succeeding <i>trading day</i>.</p> <p>The <i>Retail Metering Services Provider</i> shall transmit the <i>meter data</i> from the metering facilities to the <i>Central Registration Body's</i></p> | <p>associated <i>Retail Customers</i> registered under Chapter 2 of the <i>Retail Rules</i>.</p> <p><u>If the Retail Customer is an Aggregated Group, the Retail Metering Services Provider shall collect the metering data and event log of the whole trading day from each Aggregated Member meter at an interval basis.</u></p> <p><u>hh) 5.3.2.2 Aggregation of Aggregated Group Meter Data</u></p> <p><u>If the Retail Customer is an Aggregated Group, the Retail Metering Services Provider shall determine the metering data of an Aggregated Group as the sum of the</u></p> | | | | | |

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| | | <p>database via the data exchange protocol prescribed by the Central Registration Body (refer to Appendix C).</p> <p>For cases of questionable meter data and the Central Registration Body requires the submission of secured meter data language, the Retail Metering Services Provider shall submit and open the secured meter data language in the presence of the Central Registration Body using the Retail Metering Service Provider software for purposes of validation.</p> | <p><u>metering data collected from meters of all Aggregated Members belonging to the Aggregated Group.</u></p> <p><u>The Retail Metering Services Provider shall ensure that the metering data of an Aggregated Member that has opted out pursuant to Section 3.2.8 of the Retail Rules is excluded from the Aggregated Group metering data.</u></p> <p><u>In the process of determining the Aggregated Group metering data, the Retail Metering Services Provider shall not make, cause or allow any alteration to the original stored metering data as retrieved in the metering installation of Aggregated Members.</u></p> | | | | | |

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| | | xxx ee) | <p>ii) 5.3.2.3 5.3.2.2 Submission</p> <p>The <i>Retail Metering Services Provider</i> shall submit the collected <i>metering data</i> of the <i>trading day</i> to the <i>Central Registration Body</i> at 0400H of the succeeding <i>trading day</i>. <u>If the Retail Customer is an Aggregated Group, the Retail Metering Services Provider shall submit the aggregated metering data determined under Section 5.3.2.2 of this manual.</u></p> <p>The <i>Retail Metering Services Provider</i> shall transmit the <i>meter data</i> from the metering facilities <u>or the aggregated metering data determined under</u></p> | | | | | |

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| | | | <p><u>Section 5.3.2.2 of this manual</u> to the <i>Central Registration Body's</i> database via the data exchange protocol prescribed by the <i>Central Registration Body</i> (refer to Appendix C).</p> <p>For cases of questionable <i>meter data</i> and the <i>Central Registration Body</i> requires the submission of secured <i>meter data</i> language, the <i>Retail Metering Services Provider</i> shall submit and open the secured <i>meter data</i> language in the presence of the <i>Central Registration Body</i> using the <i>Retail Metering Service Provider</i> software for purposes of validation.</p> <p>xxx jj)</p> | | | | | |

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| DETERMINING THE METERED QUANTITIES OF CONTESTABLE CUSTOMERS | 6.6 | <p>kk) 6.6 DETERMINING THE METERED QUANTITIES OF CONTESTABLE CUSTOMERS</p> <p>The <i>metered quantity</i> of each <i>Retail Customer</i> shall be determined as the net metered flows at their respective <i>metering points</i>, before adjustment for site-specific losses as stated in <i>Retail Rules</i> Clause 3.3.5.1 II)</p> | <p>mm) 6.6 DETERMINING THE METERED QUANTITIES OF CONTESTABLE RETAIL CUSTOMERS</p> <p>The <i>metered quantity</i> of each <i>Retail Customer</i> shall be determined as the net metered flows at their respective <i>metering points</i>, before adjustment for site-specific losses as stated in <i>Retail Rules</i> Clause 3.3.25.4 nn)</p> | Generalized to Retail Customers and updated reference provision to Retail Rules | | | | |
| USE OF METERS | 6.7 | <p>oo) 6.7 USE OF METERS</p> <p>As stated in <i>Retail Rules</i> Clause 4.3.4, the registered <i>metering installation</i> shall be used by the <i>Central Registration</i></p> | <p>qq) 6.7 USE OF METERS</p> <p>As stated in <i>Retail Rules</i> Clause 4.3.54, the registered <i>metering installation</i> shall be used by the <i>Central Registration Body</i> as</p> | To clarify that virtual metering installation shall be used as reference for settlement transactions involving Aggregated Groups. | | | | |

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| | | <p>Body as the primary source of <i>metering data</i> for the settlement of the transactions of <i>Retail Customers</i> and their <i>Suppliers</i> in the WESM.</p> <p>xxx pp)</p> | <p>the primary source of <i>metering data</i> for the settlement of the transactions of <i>Retail Customers</i> and their <i>Suppliers</i> <u>the following</u> in the WESM.:</p> <p>g) <u><i>Contestable Customers</i></u> h) <u><i>GEOP End-Users</i></u> i) <u><i>Aggregated Members served by Supplier of Last Resort.</i></u> j) <u><i>Retail Electricity Suppliers.</i></u> k) <u><i>Renewable Energy Suppliers; and</i></u> l) <u><i>Suppliers of Last Resort serving Contestable Customers, GEOP End-Users and/or Aggregated Members.</i></u></p> <p><u>As stated in <i>Retail Rules</i> Clause 4.3.5, the registered <i>virtual metering installation</i></u></p> | | | | | |

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| | | | <p><u>shall be used by the Central Registration Body as the primary source of metering data for the accounting and settlement, as applicable, of the transactions of the following:</u></p> <p>d) <u>Aggregated Groups,</u></p> <p>e) <u>Retail Aggregators and</u></p> <p>f) <u>Suppliers of Last Resort serving Aggregated Groups.</u></p> <p>xxx rr)</p> | | | | | |