



ORCP-WR-WM-24-03

Date Received by Secretariat: 19-Jul-2024

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 should 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 address: mag_rrd@wesm.ph

[In accomplishing and submitting this form, you give your consent for PEMC to collect, record, organize, and update your personal data as herein provided as part of your information for purposes of rules change process.]

I. Proponent's Information

Name	Richard J. Nethercott
Designation	President and CEO
Company	Independent Electricity Market Operator of the Philippines, Inc.
Company Address	9/F Robinsons Equitable Tower ADB Ave. Ortigas Center Pasig City
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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 18.0
- ✓ WESM Manual on Market Network Model Development and Maintenance – Criteria and Procedures Issue 8.0
- ✓ WESM Manual on Dispatch Protocol Issue 21.0
- ✓ WESM Manual on Load Forecasting Methodology Issue 5.0

Topic: Proposed Amendments Involving Energy Storage Systems

Proposed Classification of Amendments (please tick the box):

☒ General ☐ Minor ☐ Urgent

If Urgent, reason for urgency:

III. SUMMARY OF THE PROPOSED RULES CHANGE

The proposed rules changes contained herein is to provide the enhancements on the WESM implementing guidelines related to the participation of Energy Storage Systems (ESS) in view of the DOE Department Circular DC2023-04-0008.

IV. BACKGROUND

The DOE issued Department Circular DC2023-04-0008 entitled “Prescribing Policy for Energy Storage System in the Electric Power Industry”, which provided the general framework for the operations of the ESS in the electric power industry to maximize the benefits provided by this emerging technology.

Currently, the WESM Rules and relevant market manuals classifies Battery Energy Storage System (BESS) and Pumped-Storage Units (PSU) as Generating Units. However, these are only specific types of ESS, whereas the DOE DC2023-04-0008 prescribed the following ESS technologies that should be allowed to operate in the Philippine power grid.

Table 1. Prescribed ESS Technologies based on DOE DC2023-04-0008

Technology	Definition
Battery Energy Storage System (BESS)	Capable of storing electric energy electrochemically from which it is able to charge or discharge electricity
Compressed Air Energy Storage (CAES)	Uses electric energy to inject high-pressure air containers. When energy is required, the pressurized air is heated and expanded in an expansion turbine driving a generator for power production
Flywheel Energy Storage (FES)	Uses electric energy to accelerate a rotating mass, called a “rotor”, to store kinetic energy. Energy is extracted from the system by drawing down the kinetic energy from the rotor
Pumped-storage hydropower (PSH)	Uses electric energy to pump water from a lower elevation reservoir to a higher elevation reservoir. When required, the water flows back from the upper to lower reservoir, powering a turbine with a generator to produce electric energy.

DOE DC2023-04-0008 further prescribed the following types of ESS configurations.

Table 2. Prescribed Types of ESS Configurations based on DOE DC2023-04-0008

Technology	Definition
Stand-Alone Energy Storage System	ESS that is connected to and stores energy sourced from the transmission or distribution system
Generating Plant and ESS	ESS is connected to the generating plant/s and can be charged from the generating plant/s or to the grid or distribution system

Technology	Definition
Integrated RE Plant and ESS	Combination of re plant/s and an ESS, where the ESS is solely charged by the re plant/s
Integrated Non-RE Plant and ESS	Refers to a combination of a conventional plant/s and an ESS, where the ESS will not charge from the grid or distribution system and that its pmax will be limited to the plant capacity

V. THE PROPOSED RULES CHANGE

The proposed changes to the WESM Rules and other Market Manuals intend to define ESS as a separate category of WESM Membership, as well as define the different ESS types prescribed in the DOE DC2023-04-0008 that may operate in the Philippine power grid.

If these proposed changes are not adopted, then the WESM design will not be aligned with the policy prescribed by the DOE, and will then limit the participation of ESS technologies, therefore hindering the investment of such facilities in the Philippine power grid.

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 Chief Executive Officer

Robinson P. Descanzo – Chief Operating Officer

Sheryll M. Dy – Head of Legal

Isidro E. Cacho, Jr. – Head of Trading Operations

Salvador D. Subaran – Head of Information Systems and Technology

Arthur P. Pintado – Head of Internal Audit

Mary Anne T. Santiago – Head of Finance

Edward I. Olmedo – Head of Market Development and Innovation

VII. CONCLUSIONS AND RECOMMENDATIONS

Amendments to the WESM Rules and various Market Manuals are proposed to conform to the DOE DC2023-04-0008 for the integration of different ESS technologies and configuration types in the WESM. It is recommended that the proposed amendments be adopted.

VIII. REFERENCES

1. WESM Rules
2. WESM Manual on Registration, Suspension and De-Registration
Criteria and Procedures Issue 18.0
3. WESM Manual on Market Network Model Development and
Maintenance – Criteria and Procedures Issue 8.0
4. WESM Manual on Dispatch Protocol Issue 21.0
5. WESM Manual on Load Forecasting Methodology Issue 5.0

Commenter	General Comments	Proponent's Response																												
ACEN	<p><u>GENERAL COMMENT 1</u></p> <p>For consistency with DOE Department Circular No. 2023-04-0008 (ESS Policy), we propose to include the following technologies under ESS:</p> <ul style="list-style-type: none">- Compressed Air Energy Storage (CAES)- Flywheel Energy Storage (FES) <p>Additionally, the matrix below shows our understanding of the ESS configurations based on the ESS Policy as against the proposed amendments.</p> <table><tr><th rowspan="2">ESS CONFIG (POLICY)</th><th rowspan="2">COC</th><th colspan="2">CHARGING</th><th rowspan="2">PROPOSAL</th></tr><tr><th>GRID/DU</th><th>GEN</th></tr><tr><td>STAND-ALONE</td><td></td><td>✓</td><td></td><td></td></tr><tr><td rowspan="2">GENERATING PLANT AND ESS (RE OR NON-RE)</td><td rowspan="2">Gen + ESS</td><td rowspan="2">✓</td><td rowspan="2">✓</td><td>If Non-RE (Integrated Generating Plant and ESS)</td></tr><tr><td>If RE (Preferential dispatch, or at its option, Integrated Generating Plant and ESS)</td></tr><tr><td>INTEGRATED NON-RE AND ESS</td><td>Gen only</td><td></td><td>✓</td><td>Not included in the proposed ESS configurations</td></tr><tr><td>INTEGRATED RE AND ESS</td><td>Gen Only</td><td></td><td>✓</td><td>Not included in the proposed ESS configurations</td></tr></table> <p>1. For Generating Plant (RE or non-RE) and ESS, the proposal introduced new terms</p> <ul style="list-style-type: none">a. For Non-RE = Integrated Generating Plant and ESS,b. For RE = Preferential Dispatch, but at its option, can be Integrated Generation Plant and ESS <p>Please clarify why plants falling under (b) will be categorized as ‘preferential dispatch’. If it exercises its option to be registered under (a), will it mean that it will be treated as non-RE instead?</p> <p>2. It appears that the ‘Integrated Non-RE and ESS’, and the ‘Integrated RE and ESS’ are not mentioned in the proposed amendments. We suggest that the amendments consider the configurations as provided under the ESS Policy for consistency.</p>	ESS CONFIG (POLICY)	COC	CHARGING		PROPOSAL	GRID/DU	GEN	STAND-ALONE		✓			GENERATING PLANT AND ESS (RE OR NON-RE)	Gen + ESS	✓	✓	If Non-RE (Integrated Generating Plant and ESS)	If RE (Preferential dispatch, or at its option, Integrated Generating Plant and ESS)	INTEGRATED NON-RE AND ESS	Gen only		✓	Not included in the proposed ESS configurations	INTEGRATED RE AND ESS	Gen Only		✓	Not included in the proposed ESS configurations	
ESS CONFIG (POLICY)	COC			CHARGING			PROPOSAL																							
		GRID/DU	GEN																											
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GENERATING PLANT AND ESS (RE OR NON-RE)	Gen + ESS	✓	✓	If Non-RE (Integrated Generating Plant and ESS)																										
				If RE (Preferential dispatch, or at its option, Integrated Generating Plant and ESS)																										
INTEGRATED NON-RE AND ESS	Gen only		✓	Not included in the proposed ESS configurations																										
INTEGRATED RE AND ESS	Gen Only		✓	Not included in the proposed ESS configurations																										

ACEN	<p><u>GENERAL COMMENT 2</u></p> <p>Regarding the use of Pumped-Storage Hydropower, we suggest to specify ‘unit’ for clarity. We note that the term Pumped-Storage Hydropower in the department circular is defined as under “ESS technologies” and not specifically as an ESS <u>facility</u>, as there is no explicit mention of “facility” under its definition.</p> <p>Example: New provision (WESM Rules 2.3.8.4) A <i>facility</i> or a group of facilities connected at a common connection point that is capable of storing water from a lower elevation reservoir to a higher elevation reservoir for the purpose of production of electrical power shall be classified as a <i>pumped-storage hydropower <u>unit</u></i>.</p>	
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Proposed Amendments

A. WESM Rules

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent’s Response	RCC Decision
Introduction – Responsibilities of the System Operator	1.3.4	Under these Rules, the <i>System Operator</i> shall have the following functions and responsibilities: (a) Be responsible for and operate the <i>power system</i> in accordance with the <i>WESM Rules</i> , the <i>Grid Code</i> and any instruction issued by the <i>Market Operator</i> or the <i>ERC</i> . (b) Provide <i>central dispatch</i> to all generation facilities and loads connected, directly or indirectly, to the transmission system in accordance with the	Under these Rules, the <i>System Operator</i> shall have the following functions and responsibilities: (a) Be responsible for and operate the <i>power system</i> in accordance with the <i>WESM Rules</i> , the <i>Grid Code</i> and any instruction issued by the <i>Market Operator</i> or the <i>ERC</i> . (b) Provide <i>central dispatch</i> to all generation facilities, <u>ESS facilities</u> , and loads connected, directly or indirectly, to the transmission system in	Inclusion of ESS facilities since it is proposed to be a separate WESM Member that should be centrally dispatched by the System Operator				

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p><i>dispatch schedule</i> submitted by the <i>Market Operator</i>.</p> <p>xxxx</p>	<p>accordance with the <i>dispatch schedule</i> submitted by the <i>Market Operator</i>.</p> <p>xxxx</p>					
Registration	2.2.1	<p>Scope of Application Other than the <i>Market Operator</i>, the <i>WESM Rules</i> apply to:</p> <p>(a) <i>System operator</i>, (b) <i>Generation Companies</i>; (c) <i>Ancillary Services Provider</i>, (d) <i>Distribution Utilities</i>; (e) <i>Suppliers</i>; (f) <i>Metering Services Providers</i>; (g) Bulk consumers/End-users; and (h) Other similar entities authorized by the ERC to become members of the WESM. All of which are WESM Participants.</p>	<p>Scope of Application Other than the <i>Market Operator</i>, the <i>WESM Rules</i> apply to:</p> <p>(a) <i>System operator</i>, (b) <i>Generation Companies</i>; (c) <i>Ancillary Services Provider</i>, (d) <i>Distribution Utilities</i>; (e) <i>Suppliers</i>; (f) <i>Metering Services Providers</i>; (g) Bulk consumers/End-users; and (h) <u>Energy Storage Systems</u>; (h)(i) Other similar entities authorized by the ERC to become members of the WESM. All of which are WESM Participants.</p>	Inclusion of ESS since it is proposed to be a separate WESM Member				
Registration	2.3.1.2	<p>2.3.1.2 To register as a <i>WESM Member</i>, a <i>Generation Company</i> shall:</p> <p>(a) Classify each of the <i>generating units</i> which form part of the <i>generating system</i> it owns, operates or controls or</p>	<p>2.3.1.2 To register as a <i>WESM Member</i>, a <i>Generation Company</i> shall:</p> <p>(a) Classify each of the <i>generating units</i> which form part of the <i>generating system</i> it owns, operates or controls or</p>	To move BESS and PSU in proposed ESS Membership Type instead of Generation Company				

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		from which it otherwise sources electricity as either a: (i) <i>scheduled generating unit</i> ; or (ii) <i>non-scheduled generating unit</i> ; or (iii) <i>must-dispatch generating unit</i> ; or (iv) <i>priority dispatch generating unit</i> ; or (v) <i>battery energy storage system</i> ; or (vi) <i>pumped-storage unit</i> .	from which it otherwise sources electricity as either a: (i) <i>scheduled generating unit</i> ; or (ii) <i>non-scheduled generating unit</i> ; or (iii) <i>must-dispatch generating unit</i> ; or (iv) <i>priority dispatch generating unit</i> ; or (v) <i>battery energy storage system</i> ; or (vi) <i>pumped-storage unit</i> .					
Registration	2.3.1.9	2.3.1.9 A facility or a group of facilities connected at a common connection point that is capable of storing electrical energy through chemical reactions from which it is able to charge or discharge electrical energy to the power system and that can be dispatched to any operating level within their entire capacity range but are also constrained by a MW or MWh limit to (1) generate energy, (2) curtail the consumption of <i>energy</i> in the case of demand response, or (3) consume <i>energy</i> shall be classified as <i>battery energy storage system</i> .	2.3.1.9 A facility or a group of facilities connected at a common connection point that is capable of storing electrical energy through chemical reactions from which it is able to charge or discharge electrical energy to the power system and that can be dispatched to any operating level within their entire capacity range but are also constrained by a MW or MWh limit to (1) generate energy, (2) curtail the consumption of <i>energy</i> in the case of demand response, or (3) consume <i>energy</i> shall be classified as <i>battery energy storage system</i>.	To move BESS definition in proposed ESS Membership Type				

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Registration	2.3.1.10	A <i>facility</i> or a group of facilities connected at a common connection point that is capable of storing water from a lower elevation reservoir to a higher elevation reservoir for the purpose of production of electrical power shall be classified as a <i>pumped-storage unit</i> .	A <i>facility</i> or a group of facilities connected at a common connection point that is capable of storing water from a lower elevation reservoir to a higher elevation reservoir for the purpose of production of electrical power shall be classified as a <i>pumped-storage unit</i>.	To move PSU definition in proposed ESS Membership Type				
Registration	2.3.1.11	2.3.1.11 A <i>Generation Company</i> shall operate its <i>battery energy storage system</i> and <i>pumped-storage unit</i> in accordance with the scheduling and dispatch procedures described in Chapter 3, within the <i>dispatch conformance standards</i> specified in accordance with Clause 3.8.5 when it is scheduled to operate as <i>Generation</i> .	2.3.1.11 A <i>Generation Company</i> shall operate its <i>battery energy storage system</i> and <i>pumped-storage unit</i> in accordance with the scheduling and dispatch procedures described in Chapter 3, within the <i>dispatch conformance standards</i> specified in accordance with Clause 3.8.5 when it is scheduled to operate as <i>Generation</i>.					
Registration	2.3.1.12	2.3.1.12 xxxx	2.3.1.12 9 xxxx	Renumbering				
Registration	2.3.1.13	2.3.1.13 xxxx	2.3.1.13 10 xxxx	Renumbering				
Registration	2.3.8	(new)	<u>Energy Storage Systems</u>	Introduce new membership type for ESS				

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Registration	2.3.8.1	(new)	<p><u>An Energy Storage System that is directly connected to a transmission system shall register with the Market Operator as a WESM Member. An embedded Energy Storage System shall register with the Market Operator as a WESM Member if it meets the following criteria:</u></p> <p><u>(a) +/- 10 MW for Luzon Grid;</u></p> <p><u>(b) +/- 5 MW for Visayas Grid;</u></p> <p><u>and</u></p> <p><u>(c) +/- 5 MW for Mindanao Grid.</u></p> <p><u>If the energy storage system does not fit the above criteria, it may register as a WESM Member on a voluntary basis.</u></p>	Proposed criteria for mandatory and voluntary registration of ESS.				
Registration	2.3.8.2	(new)	<p><u>To register as a WESM Member, the Energy Storage System shall:</u></p> <p><u>(a) Classify the facility it owns, operates, or controls as either a:</u></p> <p><u>(i) battery energy storage system</u></p> <p><u>(ii) pumped-storage hydropower</u></p> <p><u>(iii) integrated generating plant and ESS</u></p>	Proposed classification of ESS.	Please see General Comment 1			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<u>(b) Satisfy the Market Operator that those energy storage systems, and its connection points, comply with the relevant technical requirements set out in the WESM Rules, the Grid Code and Distribution Code; and</u> <u>(c) Satisfy the membership criteria specified in Clause 2.3.3.4.</u>					
Registration	2.3.8.3	(new)	<u>A facility or a group of facilities connected at a common connection point that is capable of storing electrical energy through chemical reactions from which it is able to charge or discharge electrical energy to the power system and that can be dispatched to any operating level within their entire capacity range but are also constrained by a MW or MWh limit to (1) generate energy, (2) curtail the consumption of energy in the case of demand response, or (3) consume energy shall be classified as battery energy storage system.</u>	Definition of classification for BESS				

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Registration	2.3.8.4	(new)	<u>A facility or a group of facilities connected at a common connection point that is capable of storing water from a lower elevation reservoir to a higher elevation reservoir for the purpose of production of electrical power shall be classified as a pumped-storage hydropower.</u>	Definition of classification for PSH	Please see General Comment 2			
Registration	2.3.8.5	(new)	<u>If a non-renewable energy plant has a battery energy storage system that fits the following criteria, then it shall be classified as an integrated generating plant and ESS:</u> <u>(a) All facilities are connected at a common connection point; and</u> <u>(b) Combined nameplate capacity greater than or equal to the regional thresholds provided in Clause 2.3.8.1; and</u> <u>(c) Connected battery energy storage system can be charged either from the generating unit, transmission system, or distribution system</u>	Proposed treatment of non-RE facilities that are integrated with ESS	Please see General Comment 1			
Registration	2.3.8.6	(new)	<u>If a renewable energy plant has a battery energy storage system connected at a common connection point,</u>	Proposed treatment of RE facilities that are	Please see General Comment 1			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<u>while the battery energy storage system can be charged either from the generating unit, transmission system, or distribution system, then it can be classified as a must dispatch generating unit or a priority dispatch generating unit subject to Clauses 2.3.1.5 and 2.3.1.6. It may, at its option, be classified as an integrated generating plant and ESS subject to Clause 2.3.8.5.</u>	integrated with ESS				
Registration	2.3.8.7	(new)	<u>An Energy Storage System shall register each of its connection points with the Market Operator.</u>	Clarity on registration of connection points.				
Registration	2.3.8.8	(new)	<u>An Energy Storage System shall operate its facilities in accordance with the scheduling and dispatch procedures described in Chapter 3, within the dispatch conformance standards specified in accordance with Clause 3.8.5 when it is scheduled to operate as Generation.</u>	Clarification on responsibility of ESS for scheduling and dispatch.	<p>We suggest that the monitoring of the Dispatch Conformance Standards (DCS) also take into account the state-of-charge of the Energy Storage System, as this will affect its ability to meet its Dispatch Schedule.</p> <p>Consider also if real-time State of Charge needs to be tracked by the market to enable</p>	.		

WESM Rules								
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					more granular tracking and also to help evaluate compliance/non-compliance/s given the ESS operating limits.			
Load Forecasting	3.5.4.2	Each <i>net load forecast</i> shall be prepared in such a way as to represent the net <i>load</i> to be met by <i>generation</i> from <i>scheduled generating units, must-dispatch generating units, priority dispatch generating units, non-scheduled generating units, batter energy storage systems and pumped-storage units</i> including losses occurring outside the system represented by the market network model, but excluding any <i>scheduled load</i> .	Each <i>net load forecast</i> shall be prepared in such a way as to represent the net <i>load</i> to be met by <i>generation</i> from <i>scheduled generating units, must-dispatch generating units, priority dispatch generating units, non-scheduled generating units, batter energy storage systems, and pumped-storage units</i> <u>hydropower, and integrated generating plant and ESS</u> including losses occurring outside the system represented by the market network model, but excluding any <i>scheduled load</i> .	Revised PSU to PSH and added integrated plant and ESS.	For correction of <i>batter energy storage...</i> to battery energy storage Please see General Comment 2	Each <i>net load forecast</i> shall be prepared in such a way as to represent the net <i>load</i> to be met by <i>generation</i> from <i>scheduled generating units, must-dispatch generating units, priority dispatch generating units, non-scheduled generating units, battery energy storage systems, and pumped-storage units</i> <u>hydropower unit, and integrated generating plant and ESS</u> including losses occurring outside the system represented by the market network		

WESM Rules								
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						model, but excluding any <i>scheduled load</i> .		
Load Forecasting	3.5.4.7	Each <i>pumped-storage unit</i> shall submit a forecast in respect of each dispatch interval that it will operate as <i>load</i> for each trading day of the week in accordance with the timetable. The <i>pumped-storage unit</i> shall be deemed to be operating on <i>generation</i> mode in each <i>dispatch interval</i> without a <i>load</i> forecast.	Each <i>pumped-storage unit</i> <i>unit</i> <u>hydropower</u> shall submit a forecast in respect of each <u>dispatch interval</u> that it will operate as <i>load</i> for each trading day of the week in accordance with the timetable. The <i>pumped-storage unit</i> <i>unit</i> <u>hydropower</u> shall be deemed to be operating on <i>generation</i> mode in each <i>dispatch interval</i> without a <i>load</i> forecast.	Revised PSU to PSH	Please see General Comment 2			
Submission of Offers, Bids, and Data	3.5.5.1	Each <i>Generation Company</i> including <i>Generation Companies</i> with <i>bilateral contracts</i> shall submit a standing <i>market offer</i> equivalent to the <i>maximum stable load (Pmax)</i> or <i>available capacity</i> for each of its <i>scheduled generating units, battery energy storage systems, or pumped-storage units</i> for each <i>dispatch interval</i> in each <i>trading day</i> of the week in accordance with the <i>timetable</i> . If the submitted offer reflects a capacity that is less than the <i>maximum stable load (Pmax)</i> , the <i>Generation</i>	Each <i>Generation Company</i> <u>or Energy Storage System,</u> including <i>Generation Companies</i> those with <i>bilateral contracts</i> , shall submit a standing <i>market offer</i> equivalent to the <i>maximum stable load (Pmax)</i> or <i>available capacity</i> for each of its <i>scheduled generating units, battery energy storage systems, or pumped-storage units</i> <u>hydropower, and integrated generating plant and ESS</u> for each <i>dispatch interval</i> in each <i>trading day</i> of the week in accordance with the <i>timetable</i> . If the submitted offer reflects a capacity that is less	Revised PSU to PSH and added integrated plant and ESS.	We suggest using Energy Storage System for simplicity, since it already encompasses the different ESS technologies such as PSH (including CAES and FES) and the different ESS configurations.	Each <i>Generation Company</i> <u>or Energy Storage System,</u> including <i>Generation Companies</i> those with <i>bilateral contracts</i> , shall submit a standing <i>market offer</i> equivalent to the <i>maximum stable load (Pmax)</i> or <i>available capacity</i> for each of its <i>scheduled generating units</i> <u>and Energy Storage System units,</u> <i>battery energy</i>		

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		Company shall include the reason for such in its standing offer. The standing market offer shall apply until revised or updated by the Generation Company.	than the <i>maximum stable load (Pmax)</i> , the Generation Company <u>or Energy Storage System</u> shall include the reason for such in its standing offer. The standing market offer shall apply until revised or updated by the Generation Company <u>or Energy Storage System</u> .			storage systems, or pumped-storage units <u>hydropower, and integrated generating plant and ESS</u> for each dispatch interval in each trading day of the week in accordance with the <i>timetable</i> . If the submitted offer reflects a capacity that is less than the <i>maximum stable load (Pmax)</i> , the Generation Company <u>or Energy Storage System</u> shall include the reason for such in its standing offer. The standing market offer shall apply until revised or updated by the Generation Company <u>or Energy Storage System</u> .		
Generation Offers and Data	3.5.5.2	Each <i>scheduled generating unit</i> and <i>pumped-storage unit</i> operating on <i>generation</i> mode shall submit a <i>Generation Offer</i> that includes the information specified in Appendix A1.1	Each <i>scheduled generating unit</i> , and pumped-storage unit <u>hydropower, and integrated generating plant and ESS</u> operating on <i>generation</i> mode shall submit a <i>Generation Offer</i>	Revised PSU to PSH	Consider General Comment 1			

WESM Rules								
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			that includes the information specified in Appendix A1.1					
Submission of Offers, Bids, and Data	3.5.5.3	Each <i>Generation Company</i> operating a <i>battery energy storage system</i> shall submit an <i>energy storage systems Offer</i> that includes that information specified in Appendix A1.4.	Each <i>Generation Company</i> <u>Energy Storage System</u> operating a <i>battery energy storage system</i> shall submit an <i>energy storage systems offer</i> that includes that with information specified in Appendix A1.4.	Changed to ESS for BESS facilities.				
Submission of Offers, Bids, and Data	3.5.5.13	Each <i>Generation Company</i> that has secured a <i>Final Certificate of Approval to Connect</i> but with pending issuance of <i>Certificate of Compliance</i> from the <i>ERC</i> shall submit, as applicable: a) Standing nomination of the <i>loading levels</i> for each of its <i>scheduled generating units, battery energy storage systems, and pumped-storage units</i> ; or b) <i>Projected outputs</i> in respect of its <i>must-dispatch generating units</i> and <i>priority dispatch generating units</i> . The <i>Generation Company</i> shall submit its nomination of the <i>loading levels</i> or <i>projected outputs</i> for each <i>dispatch interval</i> on each <i>trading day</i> of	Each <i>Generation Company</i> <u>or Energy Storage System</u> that has secured a <i>Final Certificate of Approval to Connect</i> but with pending issuance of <i>Certificate of Compliance</i> from the <i>ERC</i> shall submit, as applicable: a) Standing nomination of the <i>loading levels</i> for each of its <i>scheduled generating units, battery energy storage systems, and pumped-storage units hydropower, and integrated generating plant and ESS</i> ; or b) <i>Projected outputs</i> in respect of its <i>must-dispatch generating units</i> and <i>priority dispatch generating units</i> . The <i>Generation Company</i> shall submit its nomination of the <i>loading levels</i> or <i>projected outputs</i> for each <i>dispatch</i>	Revised PSU to PSH and added integrated plant and ESS.	Applicable submission i.e., generation offer, nomination of loading level, nomination of projected output, should consider all ESS configurations as provided under the ESS policy (refer to General Comment 1) Consider General Comment 2	.		

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		the week in accordance with the <i>timetable</i> . The standing nomination of the loading levels and <i>projected outputs</i> shall apply until revised or updated by the <i>Generation Company</i> .	<i>interval</i> on each <i>trading day</i> of the week in accordance with the <i>timetable</i> . The standing nomination of the loading levels and <i>projected outputs</i> shall apply until revised or updated by the <i>Generation Company</i> .					
Submission of Offers, Bids, and Data	3.5.7.2	When applicable, subject to Clause 3.3.4.2, each <i>scheduled generating unit, battery energy storage system and pumped-storage unit</i> registered as an <i>Ancillary Services Provider</i> in respect of a <i>reserve facility</i> in a particular <i>reserve region</i> shall submit a standing <i>reserve offer</i> for each of its relevant <i>reserve facilities</i> in respect of that <i>reserve region</i> for each <i>dispatch interval</i> for each day of the week in accordance with the <i>timetable</i> . The standing <i>reserve offer</i> shall apply until revised or updated by the <i>scheduled generator</i> registered as an <i>Ancillary Services Provider</i> .	When applicable, subject to Clause 3.3.4.2, each <i>scheduled generating unit, battery energy storage system and pumped-storage units</i> <u>hydropower, and integrated generating plant and ESS</u> registered as an <i>Ancillary Services Provider</i> in respect of a <i>reserve facility</i> in a particular <i>reserve region</i> shall submit a standing <i>reserve offer</i> for each of its relevant <i>reserve facilities</i> in respect of that <i>reserve region</i> for each <i>dispatch interval</i> for each day of the week in accordance with the <i>timetable</i> . The standing <i>reserve offer</i> shall apply until revised or updated by the <i>scheduled generator</i> registered as an <i>Ancillary Services Provider</i> .	Revised PSU to PSH and added integrated plant and ESS.	Consider all ESS Configurations as provided in General Comment 1 since the ESS policy did not state that only specific ESS configurations can provide AS. We note that the Policy provided that, “ESS proponents shall apply and register their ESS for Provision of Ancillary Services, among others”.			
Submission of Offers, Bids, and Data	3.5.11.1	Each <i>Trading Participant</i> which has submitted standing <i>offers</i> or bids for each of its <i>scheduled generating unit, battery energy storage system</i>	Each <i>Trading Participant</i> which has submitted standing <i>offers</i> or bids for each of its <i>scheduled generating unit, battery energy storage system and pumped-</i>	Revised PSU to PSH and added integrated plant and ESS.	-Same comment as above to consider the ESS configurations in General Comment 1.			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		and <i>pumped-storage unit</i> may revise any of its <i>market offers</i> or <i>market bids</i> equivalent to the <i>available capacity</i> and shall take into account the conditions under Clause 3.5.11.5 and Clause 3.5.11.6, for any <i>dispatch interval</i> in any trading day of the current week-ahead <i>market horizon</i> . Each revised <i>market offer</i> or <i>market bid</i> shall be submitted in accordance with the <i>timetable</i> subject to Clause 3.5.11.4 and contain all the information set out in Appendix A1.	storage units <u>hydropower, and integrated generating plant and ESS</u> may revise any of its <i>market offers</i> or <i>market bids</i> equivalent to the <i>available capacity</i> and shall take into account the conditions under Clause 3.5.11.5 and Clause 3.5.11.6, for any <i>dispatch interval</i> in any trading day of the current week-ahead <i>market horizon</i> . Each revised <i>market offer</i> or <i>market bid</i> shall be submitted in accordance with the <i>timetable</i> subject to Clause 3.5.11.4 and contain all the information set out in Appendix A1.		-Consider General Comment 2 Clerical edit – placed a comma between battery energy storage system and pumped-storage hydropower			
Market Dispatch Optimization Model	3.6.1.5	The <i>market dispatch optimization model</i> shall be designed so that, subject to the approximations and adjustments provided for by Clause 3.6.4: (a) It will produce an optimal dispatch given the objective defined by Clause 3.6.1.4, and the constraint structure defined by Clause 3.6.1.4, and specifying <i>dispatch</i> targets for each <i>scheduled generating unit</i> , <i>battery energy storage system</i> , <i>pumped-storage unit</i> ,	The <i>market dispatch optimization model</i> shall be designed so that, subject to the approximations and adjustments provided for by Clause 3.6.4: (a) It will produce an optimal dispatch given the objective defined by Clause 3.6.1.4, and the constraint structure defined by Clause 3.6.1.4, and specifying <i>dispatch</i> targets for each <i>scheduled generating unit</i> , <i>battery energy storage system</i> , <i>pumped-storage units</i> <u>hydropower, integrated</u>	Revised PSU to PSH and added integrated plant and ESS.	-Consider ESS Configurations in General Comment 1 -Consider General Comment 2			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p><i>non-scheduled generating unit, must-dispatch generating unit, priority dispatch generating unit, scheduled load and reserve facility;</i></p> <p>xxxx</p>	<p><u>generating plant and ESS,</u> <i>non-scheduled generating unit, must-dispatch generating unit, priority dispatch generating unit, scheduled load and reserve facility;</i></p> <p>xxxx</p>					
	3.6.1.8	<p>When restricting <i>dispatch</i> targets under Clause 3.6.1.7, the <i>market dispatch optimization model</i> shall consider the following hierarchy when a combination of the groups is to be restricted:</p> <p>(a) <i>market offers of scheduled generating units, battery energy storage systems and pumped-storage units</i> operating on generation mode beyond its minimum</p> <p>(b) <i>Non-scheduled generating units</i></p> <p>(c) <i>Priority dispatch generating units</i></p> <p>(d) <i>Must-dispatch generating units</i></p>	<p>When restricting <i>dispatch</i> targets under Clause 3.6.1.7, the <i>market dispatch optimization model</i> shall consider the following hierarchy when a combination of the groups is to be restricted:</p> <p>(a) <i>market offers of scheduled generating units, battery energy storage system, and pumped-storage units</i> <u>hydropower</u> operating on generation mode beyond its minimum, <u>and integrated generating plant and ESS</u></p> <p>(b) <i>Non-scheduled generating units</i></p> <p>(c) <i>Priority dispatch generating units</i></p> <p>(d) <i>Must-dispatch generating units</i></p>	Revised PSU to PSH and added integrated plant and ESS.	<p>- Consider all ESS Configurations as provided in General Comment 1</p> <p>- We suggest that Integrated RE and ESS technologies be among the last to be curtailed when restricting dispatch given that it uses an RE resource.</p>			
Scheduling and Dispatch Implementation	3.8.1	Prior to commencement of each <i>dispatch interval</i> , the <i>Market Operator</i> shall, in consultation with the <i>System</i>	Prior to commencement of each <i>dispatch interval</i> , the <i>Market Operator</i> shall, in consultation with the <i>System Operator</i> , and	Revised PSU to PSH and added integrated plant and ESS.	Suggest to include ESS in item (a)	Prior to commencement of each <i>dispatch interval</i> , the <i>Market</i>		

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p><i>Operator</i>, and in accordance with the <i>timetable</i> prescribed in the <i>relevant Market Manuals</i>:</p> <p>(a) Determine, or estimate, the <i>status</i> of all <i>generation facility</i> for that <i>dispatch interval</i>;</p> <p>xxxx</p> <p>(e) Use the <i>market dispatch optimization model</i> to determine the <i>target loading level</i> in <i>MW</i> for each <i>scheduled generating unit, battery energy storage system, pumped-storage unit, must-dispatch generating unit, priority dispatch generating unit, non-scheduled generating unit, scheduled load and reserve facility</i> for the end of that <i>dispatch interval</i> using the latest data from the <i>System Operator and Trading Participants</i>;</p> <p>(f) Submit to the <i>System operator</i> the <i>dispatch schedule</i> containing the <i>target loading levels</i> to be achieved at the end of that <i>dispatch interval</i>, determined in accordance with Clause 3.8.1 (e);</p>	<p>in accordance with the <i>timetable</i> prescribed in the <i>relevant Market Manuals</i>:</p> <p>(a) Determine, or estimate, the <i>status</i> of all <i>generation facility</i> for that <i>dispatch interval</i>;</p> <p>xxxx</p> <p>(e) Use the <i>market dispatch optimization model</i> to determine the <i>target loading level</i> in <i>MW</i> for each <i>scheduled generating unit, battery energy storage system, pumped-storage units <u>hydropower, integrated generating plant and ESS</u>, must-dispatch generating unit, priority dispatch generating unit, non-scheduled generating unit, scheduled load and reserve facility</i> for the end of that <i>dispatch interval</i> using the latest data from the <i>System Operator and Trading Participants</i>;</p> <p>(f) Submit to the <i>System operator</i> the <i>dispatch schedule</i> containing the <i>target loading levels</i> to be achieved at the end of that <i>dispatch interval</i>, determined in accordance with Clause 3.8.1 (e);</p>		For item (e) and (g), consider the ESS configurations in General Comment 1	<p><i>Operator</i> shall, in consultation with the <i>System Operator</i>, and in accordance with the <i>timetable</i> prescribed in the <i>relevant Market Manuals</i>:</p> <p>(a) Determine, or estimate, the <i>status</i> of all <i>generation facility and <u>Energy Storage Systems</u></i> for that <i>dispatch interval</i>;</p>		

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p>(g) Send to all <i>Trading Participants</i> a <i>dispatch schedule</i> that contains <i>target loading levels</i> in respect of their <i>scheduled generating unit, battery energy storage system, pumped-storage unit, must-dispatch generating unit, priority dispatch generating unit</i> and <i>non-scheduled generating units</i> calculated under Clause 3.8.1(e) for each <i>dispatch interval</i> prior to the commencement of that <i>dispatch interval</i> in accordance with the relevant <i>Market Manuals</i>;</p> <p>xxxx</p>	<p>(g) Send to all <i>Trading Participants</i> a <i>dispatch schedule</i> that contains <i>target loading levels</i> in respect of their <i>scheduled generating unit, battery energy storage system, pumped-storage units</i> <u>hydropower, integrated generating plant and ESS</u>, <i>must-dispatch generating unit, priority dispatch generating unit</i> and <i>non-scheduled generating units</i> calculated under Clause 3.8.1(e) for each <i>dispatch interval</i> prior to the commencement of that <i>dispatch interval</i> in accordance with the relevant <i>Market Manuals</i>;</p> <p>xxxx</p>					
System Operator Implementation of Real-Time Dispatch	3.8.3.3	<p>All <i>scheduled generating units, battery energy storage systems, pumped-storage units</i> and <i>priority dispatch generating units</i> shall follow all instructions from the <i>System Operator</i>, in accordance with the <i>Grid Code</i>, the <i>WESM Rules</i> and pertinent <i>Market Manuals</i>.</p>	<p>All <i>scheduled generating units, battery energy storage systems, pumped-storage units</i> <u>hydropower, integrated generating plant and ESS</u>, and <i>priority dispatch generating units</i> shall follow all instructions from the <i>System Operator</i>, in accordance with the <i>Grid Code</i>, the <i>WESM Rules</i> and pertinent <i>Market Manuals</i>.</p>	Revised PSU to PSH and added integrated plant and ESS.	Consider all ESS Configurations as provided in General Comment 1			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Market Information	3.11.1.3	Each <i>trading day</i> , in accordance with the <i>timetable</i> , the <i>Market Operator</i> shall <i>publish</i> : (a) The <i>dispatch schedule</i> for each <i>scheduled generating unit</i> , <i>battery energy storage system</i> , <i>pumped-storage unit</i> , <i>must-dispatch generating unit</i> , <i>priority dispatch generating unit</i> , <i>non-scheduled generating unit</i> and <i>scheduled load</i> in each <i>dispatch interval</i> in the <i>settlement intervals</i> for the previous <i>trading day</i> ; and (b) A summary of the information provided to it with respect to each <i>dispatch interval</i> by the <i>System Operator</i> in accordance with Clause 3.8.2.2.	Each <i>trading day</i> , in accordance with the <i>timetable</i> , the <i>Market Operator</i> shall <i>publish</i> : (a) The <i>dispatch schedule</i> for each <i>scheduled generating unit</i> , <i>battery energy storage system</i> , <i>pumped-storage units</i> <u>hydropower, integrated generating plant and ESS</u> , <i>must-dispatch generating unit</i> , <i>priority dispatch generating unit</i> , <i>non-scheduled generating unit</i> and <i>scheduled load</i> in each <i>dispatch interval</i> in the <i>settlement intervals</i> for the previous <i>trading day</i> ; and (b) A summary of the information provided to it with respect to each <i>dispatch interval</i> by the <i>System Operator</i> in accordance with Clause 3.8.2.2.	Revised PSU to PSH and added integrated plant and ESS.	Consider all ESS Configurations as provided in General Comment 1			
Glossary		(new)	<u>Energy Storage System. A facility capable of absorbing energy directly from the Grid or Distribution System, or from a generating unit connected to the grid or distribution system and storing it for a time period, then injecting stored energy when prompted and needed to ensure reliability and a balanced power system.</u>	New ESS definition based on DOE DC2023-04-0008				

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Glossary		Battery Energy Storage System. A system with all related equipment essential to its functioning as a single entity which is capable of storing electrical <i>energy</i> through chemical reactions from which it is able to charge or discharge electrical <i>energy</i> to the power system.	Battery Energy Storage System. A system with all related equipment essential to its functioning as a single entity which is capable of storing electrical <i>energy</i> through chemical reactions from which it is able to charge or discharge electrical <i>energy</i> to the power system. <u>A facility capable of storing electric energy electrochemically from which it is able to charge or discharge electric energy.</u>	Revised definition to be consistent with DOE DC2023-04-0008				
Glossary		Loading Level. The instantaneous level of output or consumption (in MW) of a <i>generating unit or load</i> .	Loading Level. The instantaneous level of output or consumption (in MW) of a <i>generating unit, <u>energy storage system</u>, or load</i> .	To include ESS				
Glossary		Pumped-Storage Unit. A <i>facility</i> or group of facilities that act as <i>load</i> while using <i>energy</i> to pump water to higher elevation reservoirs, and then act like generators by producing electric <i>energy</i> when water is release back to the lower reservoir.	<u>Pumped-Storage Unit Hydropower.</u> A facility or group of facilities that act as <i>load</i> while using <i>energy</i> to pump water to higher elevation reservoirs, and then act like generators by producing electric <i>energy</i> when water is release back to the lower reservoir <u>uses electric energy to pump water from a lower elevation reservoir to a higher elevation reservoir.</u> <u>When required, the water flows back to the upper to the</u>	Revised definition to be consistent with DOE DC2023-04-0008	Consider General Comment 2			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<u>lower reservoir, powering a turbine with a generator to produce electric energy.</u>					
Appendix	A1.4	<p>Battery Energy Storage System Offer:</p> <p>(a) Shall include the location of the <i>connection point</i> and relevant <i>market network node</i>;</p> <p>(b) Shall include the <i>pricing zone</i> of the <i>connection point</i>,</p> <p>(c) May include up to ten (10) <i>energy offer</i> blocks per (aggregate) unit. The maximum combined capacity of <i>generation</i> and <i>reserve offers</i> must not be less than the available capacity of the generator;</p> <p>(d) Shall be for a minimum block size of 1 MW;</p> <p>(e) Shall have monotonically increasing prices and quantity</p> <p>(f) May start from a negative quantity to represent its projected maximum consumption;</p> <p>(g) May include negative prices</p> <p>(h) May include the projected state-of-charge at the start of the relevant dispatch interval</p>	<p>Battery Energy Storage System Offer:</p> <p>(a) Shall include the location of the <i>connection point</i> and relevant <i>market network node</i>;</p> <p>(b) Shall include the <i>pricing zone</i> of the <i>connection point</i>,</p> <p>(c) May include up to ten (10) <i>energy offer</i> blocks per (aggregate) unit. The maximum combined capacity of <i>generation</i> and <i>reserve offers</i> must not be less than the available capacity of the generator;</p> <p>(d) Shall be for a minimum block size of 1 MW;</p> <p>(e) Shall have monotonically increasing prices and quantity <u>for discharging</u></p> <p><u>(f) Shall have monotonically decreasing prices for charging</u></p> <p>(fg) May start from a negative quantity to represent its projected maximum consumption;</p> <p>(gh) May include negative prices</p> <p>(hi) May include the projected state-of-charge at the start of the relevant dispatch interval</p>					

B. WESM Manual on Registration, Suspension, and De-Registration Criteria and Procedures Issue 18.0

WESM Manual on Registration, Suspension, and De-Registration Criteria and Procedures Issue 18.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Other Considerations	2.5.4.1	<p>Generation Unit Classification</p> <p>a) An Applicant wishing to register as Generation Company shall, upon application, classify each of the generating unit or group of generating units which form part of the generating system it owns or operates or controls or from which it otherwise sources electricity as either –</p> <p>(i) Scheduled generating unit/s for unit/s that are connected to a common connection point with a nameplate rating or a combined nameplate rating of greater than or equal to the following regional thresholds:</p> <ul style="list-style-type: none">o 10 MW for Luzon Grido 5 MW Visayas Grid; <p>and</p> <ul style="list-style-type: none">o 5 MW for Mindanao Grid.	<p>Generation Unit Classification of <u>Generating Units</u></p> <p>a) An Applicant wishing to register as Generation Company shall, upon application, classify each of the generating unit or group of generating units which form part of the generating system it owns or operates or controls or from which it otherwise sources electricity as either –</p> <p>(i) Scheduled generating unit/s for unit/s that are connected to a common connection point with a nameplate rating or a combined nameplate rating of greater than or equal to the following regional thresholds:</p> <ul style="list-style-type: none">o 10 MW for Luzon Grido 5 MW Visayas Grid; <p>and</p>	Clerical changes. Then moved BESS and PSH to different section.				

WESM Manual on Registration, Suspension, and De-Registration Criteria and Procedures Issue 18.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p>xxxx</p> <p>(iv) A priority dispatch generating unit for a generating unit or group of generating units connected at a common connection point that are qualified renewable energy plants that are not must dispatch, such as those using either geothermal energy or biomass as fuel, or is an impounding hydro plant, and is not providing frequency control ancillary services. However, the Generation Company may also elect to have such unit/s classified as scheduled generating unit/s or non-scheduled generating unit/s subject to this Section.</p> <p>(v) Battery Energy Storage System are generating units that are connected at a common connection point that are capable of storing</p>	<p>o 5 MW for Mindanao Grid.</p> <p>xxxx</p> <p>(iv) A priority dispatch generating unit for a generating unit or group of generating units connected at a common connection point that are qualified renewable energy plants that are not must dispatch, such as those using either geothermal energy or biomass as fuel, or is an impounding hydro plant, and is not providing frequency control ancillary services. However, the Generation Company may also elect to have such unit/s classified as scheduled generating unit/s or non-scheduled generating unit/s subject to this Section.</p> <p>(v) Battery Energy Storage System are generating units that are connected at a common</p>					

WESM Manual on Registration, Suspension, and De-Registration Criteria and Procedures Issue 18.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p>electrical energy through chemical reactions from which it is able to charge or discharge electrical energy to the power system and that can be dispatched to any operating level within their entire capacity range but are also constrained by a MW or MWh limit to (1) generate Energy, (2) curtail the consumption of Energy in the case of demand response, or (3) consume Energy. However, the Generation Company may also elect to have such unit/s classified as scheduled generating unit/s or non-scheduled generating unit/s subject to this Section.</p> <p>(vi) Pumped-storage units are generating units connected at a common connection point that is capable of storing water from a lower elevation reservoir to a higher elevation reservoir for the</p>	<p>connection point that are capable of storing electrical energy through chemical reactions from which it is able to charge or discharge electrical energy to the power system and that can be dispatched to any operating level within their entire capacity range but are also constrained by a MW or MWh limit to (1) generate Energy, (2) curtail the consumption of Energy in the case of demand response, or (3) consume Energy. However, the Generation Company may also elect to have such unit/s classified as scheduled generating unit/s or non-scheduled generating unit/s subject to this Section.</p> <p>(vi) Pumped-storage units are generating units connected at a common connection point that is capable of</p>					

WESM Manual on Registration, Suspension, and De-Registration Criteria and Procedures Issue 18.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p>purpose of production of electrical power shall be classified as a pumped-storage unit. However, the Generation Company may also elect to have such unit/s classified as scheduled generating unit/s or nonscheduled generating unit/s subject to this Section.</p> <p>However, the Generation Company may also elect to have such unit/s classified as scheduled generating unit/s or non-scheduled generating unit/s subject to this Section.</p> <p>b) For the foregoing purposes, the reserve regions in the WESM correspond to the major grids of the transmission system and are Luzon, Visayas and Mindanao.</p> <p>c) The Market Operator shall approve the classification of a generating unit/s as either a non-scheduled generating unit or a must-dispatch generating unit or a priority dispatch generating unit or an energy storage system,</p>	<p>storing water from a lower elevation reservoir to a higher elevation reservoir for the purpose of production of electrical power shall be classified as a pumped-storage unit. However, the Generation Company may also elect to have such unit/s classified as scheduled generating unit/s or nonscheduled generating unit/s subject to this Section.</p> <p>However, the Generation Company may also elect to have such unit/s classified as scheduled generating unit/s or non-scheduled generating unit/s subject to this Section.</p> <p>b) For the foregoing purposes, the reserve regions in the WESM correspond to the major grids of the transmission system and are Luzon, Visayas and Mindanao.</p>					

WESM Manual on Registration, Suspension, and De-Registration Criteria and Procedures Issue 18.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		subject to prevailing relevant rules, regulations and issuances. An Applicant may appeal the decision of the Market Operator to the PEM Board.	c) The Market Operator shall approve the classification of a generating unit/s as either a non-scheduled generating unit or a must-dispatch generating unit or a priority dispatch generating unit or an energy storage system , subject to prevailing relevant rules, regulations and issuances. An Applicant may appeal the decision of the Market Operator to the PEM Board.					
Other Considerations	2.5.4.2	(new)	<p><u>Classification of Energy Storage Systems</u></p> <p><u>a) An Applicant wishing to register as an Energy Storage System shall, upon application, classify each of its facility that form part of the Energy Storage System it owns, operates, or controls as either a:</u></p> <p><u>(i) Battery Energy Storage System for a facility or a group of facilities connected at a common connection point that is capable of storing electrical energy through</u></p>	New section for ESS	<p>-Consider ESS Configurations in General Comment 1</p> <p>-Consider General Comment 2 re: PSH</p>			

WESM Manual on Registration, Suspension, and De-Registration Criteria and Procedures Issue 18.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<p><u>chemical reactions from which it is able to charge or discharge electrical energy to the power system and that can be dispatched to any operating level within their entire capacity range but are also constrained by a MW or MWh limit to (1) generate energy, (2) curtail the consumption of energy in the case of demand response, or (3) consume energy.</u></p> <p><u>(ii) Pumped-storage hydropower for a facility or a group of facilities connected at a common connection point that is capable of storing water from a lower elevation reservoir to a higher elevation reservoir for the purpose of production of electrical power.</u></p> <p><u>(iii) Integrated Generating Plant and</u></p>					

WESM Manual on Registration, Suspension, and De-Registration Criteria and Procedures Issue 18.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<p><u>ESS is a non-renewable energy plant with a battery energy storage system that fits the following criteria:</u></p> <ul style="list-style-type: none">○ <u>All facilities are connected at a common connection point; and</u>○ <u>Combined nameplate capacity greater than or equal to the regional thresholds provided in Clause 2.3.8.1; and</u>○ <u>Connected battery energy storage system can be charged either from the generating unit, transmission system, or distribution system</u>					

WESM Manual on Registration, Suspension, and De-Registration Criteria and Procedures Issue 18.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<u>b) If a renewable energy plant has a battery energy storage system connected at a common connection point, while the battery energy storage system can be charged either from the generating unit, transmission system, or distribution system, then it can be classified as a must dispatch generating unit or a priority dispatch generating unit subject to Clause 2.5.4.1 of this Market Manual. It may, at its option, be classified as an integrated generating plant and ESS subject to Clause 2.5.4.2 (iii).</u>					
Other Considerations	2.5.4.3	2.5.4.2 Aggregation of Generating Units	2.5.4.2 3 Aggregation of Generating Units	Renumbered				
Other Considerations	2.5.4.4	(new)	<u>2.5.4.4 Modelling of Energy Storage Systems</u> <u>At the very least, battery energy storage systems, pumped-storage hydropower, and integrated generating plant and ESS shall be modelled as a single resource for each connection point.</u>	Provided clause for the general framework of modelling ESS as a single resource per connection point	Consider General Comment 1 re: ESS Configurations			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<u>An Energy Storage System that owns multiple facilities in a single connection point shall, upon application, inform the Market Operator if it wishes to have a different representation of its facilities in the market network model. The Applicant, the Network Services Provider, Metering Services Provider, System Operator, and the Market Operator shall agree on the manner of market resource representation in accordance with the procedures set forth in relevant Market Manuals.</u>					
Other Considerations	2.5.4.5	2.5.4.3. Dispatch Conformance Standards A Generation Company shall operate scheduled generating units, priority dispatch generating units, battery energy storage systems and pumped-storage units in accordance with the scheduling and dispatch procedures described in Chapter 3, and in accordance with the dispatch conformance standards specified in accordance with Clause 3.8.5.	2.5.4.3 5 . Dispatch Conformance Standards A Generation Company shall operate scheduled generating units, priority dispatch generating units, battery energy storage systems and pumped-storage units <u>hydro</u> in accordance with the scheduling and dispatch procedures described in Chapter 3, and in accordance with the dispatch conformance standards specified in accordance with Clause 3.8.5.	Renumbered and changed PSU to PSH.	-Consider General Comment 2			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Other Considerations	2.5.4.6	<p>2.5.4.4. Generation Registered Capacities</p> <p>A Generation Company shall include in its application for registration the maximum stable load (Pmax), the minimum stable load (Pmin), the ramp up rate, and the ramp down rate of each generating unit or aggregated generating units that are included in its application.</p> <p>xxxx</p> <p>For Generation Companies applying for the Commercial Operations registration, the information on the generating unit parameters provided to the Market Operator shall be consistent with that contained in the Certificate of Compliance or the Provisional Authority to Operate issued by the ERC, as well as submissions made to the ERC in relation to the issuance thereof. If the generating unit is a battery energy storage system, the Generation Company shall include the generating unit's energy storage efficiency and maximum storage capacity in its Application. If the</p>	<p>2.5.4.46. Generation Registered Capacities</p> <p>A Generation Company shall include in its application for registration the maximum stable load (Pmax), the minimum stable load (Pmin), the ramp up rate, and the ramp down rate of each generating unit or aggregated generating units that are included in its application.</p> <p>xxxx</p> <p>For Generation Companies applying for the Commercial Operations registration, the information on the generating unit parameters provided to the Market Operator shall be consistent with that contained in the Certificate of Compliance or the Provisional Authority to Operate issued by the ERC, as well as submissions made to the ERC in relation to the issuance thereof. If the generating unit is a battery energy storage system, the Generation Company shall include the generating unit's energy storage efficiency and maximum storage capacity in its Application. If the</p>	Renumbered and removed reference for BESS				

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		<p>is a pumped-storage unit, the Generation Company shall include the generating unit's maximum pump load.</p> <p>xxxx</p>	<p>generating unit is a pumped-storage unit, the Generation Company shall include the generating unit's maximum pump load.</p> <p>xxxx</p>					
Other Considerations	2.5.4.7	(new)	<p><u>2.5.4.4. Registered Capabilities of Energy Storage Systems</u></p> <p><u>An Energy Storage System shall include in its application for registration the maximum operating limit, the minimum operating limit, the maximum ramp up rate, and the maximum ramp down rate of the energy storage system that are included in its application.</u></p> <p><u>The following table establishes the minimum and maximum operating limits, the maximum ramp up rate, and the minimum ramp down rate for each energy storage system.</u></p> <p><u><see table 1 at the end of the proposal></u></p>	New section for detailing technical data requirements for registration of ESS facility.	<p>-Consider all ESS Configurations as provided in General Comment 1</p> <p>- Consider General Comment 2 re: PSH</p>			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<p><u>For Energy Storage Systems applying for the Test and Commissioning registration, the information on the generating unit parameters provided to the Market Operator shall be consistent with that contained in the ERC Form 7 (General Plant Description) duly received by the ERC.</u></p> <p><u>For Energy Storage Systems applying for the Commercial Operations registration, the information on the facility parameters provided to the Market Operator shall be consistent with that contained in the Certificate of Compliance or the Provisional Authority to Operate issued by the ERC, as well as submissions made to the ERC in relation to the issuance thereof.</u></p> <p><u>For battery energy storage systems and integrated generating plant and ESS, the Energy Storage System shall include the facility's energy storage efficiency and</u></p>		<p>We note that this should be updateable every year since the storage efficiency and maximum storage capacity will change</p>			

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			<p><u>maximum storage capacity of the BESS in its Application.</u></p> <p><u>For pumped-storage hydropower, the Generation Company shall include the generating unit's pumping MW limit.</u></p> <p><u>The Energy Storage System shall also provide information on the location of the real-time monitoring facility where the minimum operating limit, maximum operating limit, and ramp up/down rates were certified at (i.e., gross generation, or net of station use). Should the location represent the gross generation output of the generating system, the Energy Storage System shall comply with the procedures provided for under Section 2.5.4.8 of this Market Manual.</u></p>		<p>depending on how the BESS is being operated.</p> <p>Additionally, please clarify whether the storage capacity is the actual SOC or the usable SOC (e.g. if SOC is limited from exceeding 95% or going below 5%, should the capacity reflect 5-95, or 0-100?)</p>			
Other Considerations	2.5.4.8	<p>2.5.4.5. Modelling of Station Use of Generating Units</p> <p>A Generation Company shall inform the Network Service Provider and the Market Operator of the provisions of its station use</p>	<p>2.5.4.58. Modelling of Station Use of Generating Units <u>and Energy Storage Systems</u></p> <p>A Generation Company <u>or Energy Storage System</u> shall inform the Network Service Provider and the Market</p>	Added ESS				

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		for registration and inclusion in the market network model.	Operator of the provisions of its station use for registration and inclusion in the market network model.					
Other Considerations	2.5.4.9	<p>2.5.4.6. Modelling of Generating Units of Ancillary Service Providers</p> <p>A Generation Company with generating units providing ancillary services, in coordination with Market Operator, shall ensure that the generating units are represented in the market network model in accordance with the requirements of the System Operator.</p>	<p>2.5.4.69. Modelling of Generating Units of Ancillary Service Providers</p> <p>A Generation Company <u>or Energy Storage System</u> with generating units <u>facilities</u> providing ancillary services, in coordination with Market Operator, shall ensure that the generating units <u>facilities</u> are represented in the market network model in accordance with the requirements of the System Operator.</p>	Added ESS and standardized the use of the term “facility” for asset owned as generating unit or ESS facility.				
Other Considerations	2.5.4.10	<p>2.5.4.7. Modelling of Generating Unit's Availability</p> <p>Upon registration, Trading Participants shall specify if the availability of its generating unit shall be based on the real-time status of its generator circuit breaker, or on the availability of its market offers.</p>	<p>2.5.4.7. Modelling of Generating Unit <u>Facility's</u> Availability</p> <p>Upon registration, Trading Participants shall specify if the availability of its generating unit <u>facility</u> shall be based on the real-time status of its generator <u>main</u> circuit breaker, or on the availability of its market offers.</p>	Used the term “facility” for asset owned as generating unit or ESS facility.				
Other Considerations	2.5.4.11	<p>2.5.4.8. Real-Time Monitoring Location</p> <p>During the registration of the generating unit, the Generation</p>	<p>2.5.4.811. Real-Time Monitoring Location</p> <p>During the registration of the generating unit <u>facility</u>, the</p>	Added ESS and standardized the use of the term “facility” for asset owned as				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		Company shall specify if its real-time monitoring will be at the gross MW output of the generating unit or at the same location as its market trading node, which is at its connection point and net of its station use, in accordance with the guidelines set forth in the WESM Manual on Market Network Model Development and Maintenance Procedures.	Generation Company or Energy Storage System shall specify if its real-time monitoring will be at the gross MW output of the generating unit facility or at the same location as its market trading node, which is at its connection point and net of its station use, in accordance with the guidelines set forth in the WESM Manual on Market Network Model Development and Maintenance Procedures.	generating unit or ESS facility.				
Registration Phases	2.5.5.1	<p>An Applicant wishing to register as a Generation Company or a generating system as an additional facility shall start its registration from one of the following phases:</p> <p>xxxx</p> <p>b) If the Applicant needs to conduct the necessary test and commissioning process as required by the PGC, the Applicant shall undergo Test and Commissioning Registration. For this purpose, Test and Commissioning shall refer to the generating unit's connection/synchronization to the grid.</p>	<p>An Applicant wishing to register as a Generation Company, an Energy Storage System, or a generating system as an additional facility shall start its registration from one of the following phases:</p> <p>xxxx</p> <p>b) If the Applicant needs to conduct the necessary test and commissioning process as required by the PGC, the Applicant shall undergo Test and Commissioning Registration. For this purpose, Test and Commissioning shall refer to the generating unit's facility's</p>	Added ESS and standardized the use of the term "facility" for asset owned as generating unit or ESS facility.				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		xxxx	connection/synchronization to the grid.					
		xxxx	xxxx					
Assessment of Applications	2.5.6.1	<p>Submission and Preliminary Assessment of Applications</p> <p>xxxx</p> <p>An Applicant as a Generation Company shall comply with the authorization requirement under Section 2.5.3.1 based on its registration phase as follows:</p> <p>1. Backfeed Registration. The Applicant shall submit a receiving copy of its application with the ERC for a Certificate of Compliance, together with Form 7 (General Plant Description) duly stamped “received” by the ERC.</p> <p>2. Test and Commissioning Registration. The Applicant shall submit the scheduled date of Test and Commissioning, as coordinated with the Network Service Provider¹⁵ and System Operator, for the conduct of test and commissioning. Prior to the actual conduct of test and commissioning, the Generation Company shall furnish the Market</p>	<p>Submission and Preliminary Assessment of Applications</p> <p>xxxx</p> <p>An Applicant as a Generation Company <u>or Energy Storage System</u> shall comply with the authorization requirement under Section 2.5.3.1 based on its registration phase as follows:</p> <p>1. Backfeed Registration. The Applicant shall submit a receiving copy of its application with the ERC for a Certificate of Compliance, together with Form 7 (General Plant Description) duly stamped “received” by the ERC.</p> <p>2. Test and Commissioning Registration. The Applicant shall submit the scheduled date of Test and Commissioning, as coordinated with the Network Service Provider¹⁵ and System Operator, for the conduct of test and commissioning. Prior to the actual conduct of test and commissioning, the Generation</p>	Added ESS and standardized the use of the term “facility” for asset owned as generating unit or ESS facility.				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p>Operator and System Operator a copy of its Provisional Certificate of Approval to Connect (PCATC). Embedded generators shall submit a Clearance to energize from the Network Service Provider as an additional requirement. The test and commissioning period of the Applicant shall be as indicated in the Provisional Certificate of Approval to Connect. Applicant shall submit a receiving copy of its application with the ERC for a Certificate of Compliance, together with Form 7 (General Plant Description) duly stamped "received" by the ERC if this was not yet submitted. In case of extended period for Test and Commissioning, the Applicant shall submit to the Market Operator the corresponding extended PCATC three (3) working days from the original expiry date of PCATC indicating the approved period for the extended conduct of Test and Commissioning.</p> <p>xxxx</p> <p>h) Participant Interface Access. During the Test and</p>	<p>Company or Energy Storage System shall furnish the Market Operator and System Operator a copy of its Provisional Certificate of Approval to Connect (PCATC). Embedded generators <u>facilities</u> shall submit a Clearance to energize from the Network Service Provider as an additional requirement. The test and commissioning period of the Applicant shall be as indicated in the Provisional Certificate of Approval to Connect. Applicant shall submit a receiving copy of its application with the ERC for a Certificate of Compliance, together with Form 7 (General Plant Description) duly stamped "received" by the ERC if this was not yet submitted. In case of extended period for Test and Commissioning, the Applicant shall submit to the Market Operator the corresponding extended PCATC three (3) working days from the original expiry date of PCATC indicating the approved period for the extended conduct of Test and Commissioning.</p> <p>xxxx</p>					

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		Commissioning Registration phase, the Applicant may subscribe to and allow the Market Operator to apply or install a method employing encryption in its computers to provide secure access to the Market Management System. The Applicant shall have read-only access to the Market Management System for its facility during the Test and Commissioning phase to enable the Trading Participant to view its generating unit's schedules. Full access for its facility will only be enabled by the Market Operator no later than eight (8) calendar days from approval of the Applicant's Commercial Operations registration, or from the date of effectivity of Final Certificate of Approval to Connect (FCATC) if the Energy Regulatory Commission (ERC) is yet to issue the COC.	h) Participant Interface Access. During the Test and Commissioning Registration phase, the Applicant may subscribe to and allow the Market Operator to apply or install a method employing encryption in its computers to provide secure access to the Market Management System. The Applicant shall have read-only access to the Market Management System for its facility during the Test and Commissioning phase to enable the Trading Participant to view its generating unit's facility's schedules. Full access for its facility will only be enabled by the Market Operator no later than eight (8) calendar days from approval of the Applicant's Commercial Operations registration, or from the date of effectivity of Final Certificate of Approval to Connect (FCATC) if the Energy Regulatory Commission (ERC) is yet to issue the COC.					
Approval of Applications	2.5.7.3	Guidelines for Test and Commissioning Registration a) The WESM Member shall be allowed to declare bilateral	Guidelines for Test and Commissioning Registration a) The WESM Member shall be allowed to declare bilateral	Added ESS and standardized the use of the term "facility" for assets				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p>contract quantities for its generating unit and be entitled to WESM payments for its generated output only:</p> <p>(i) within the test and commissioning period indicated in the valid Provisional Certificate of Approval to Connect (PCATC) issued by the Network Service Provider or until completion of the conduct of test and commissioning, if completed earlier; or</p> <p>(ii) when the WESM Member is issued a FCATC by the Network Service Provider pending the issuance of the COC by the ERC, unless the latter issues an Order for the immediate disconnection of the generating unit from the Grid.</p> <p>In the absence of the requirement or condition set forth in this Section, except for its own station use, generation beyond the authorized period of test and commissioning shall not be allowed, unless an extended</p>	<p>contract quantities for its generating unit facility and be entitled to WESM payments for its generated output only:</p> <p>(i) within the test and commissioning period indicated in the valid Provisional Certificate of Approval to Connect (PCATC) issued by the Network Service Provider or until completion of the conduct of test and commissioning, if completed earlier; or</p> <p>(ii) when the WESM Member is issued a FCATC by the Network Service Provider pending the issuance of the COC by the ERC, unless the latter issues an Order for the immediate disconnection of the generating unit facility from the Grid.</p> <p>In the absence of the requirement or condition set forth in this Section, except for its own station use, generation beyond the authorized period of</p>	owned as generating unit or ESS facility.				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p>period has been approved by the Network Service Provider. Neither shall such generation be declared as a bilateral contract quantity nor shall it be entitled to WESM payments. Any net surplus as a result of injected energy from unauthorized test and commissioning activity or operation will be treated in accordance with Clause 3.13.12 of the WESM Rules. However, the WESM Member shall still be charged for all withdrawals from the grid or distribution network, as the case may be.</p> <p>b) Dispatch of a generating unit to which FCATC has been released but with pending issuance of COC shall be in accordance with the following:</p> <p>(i) For its must-dispatch generating units, the Generation Company shall submit projected output to the Market Operator and comply with the applicable forecast accuracy standards; and</p> <p>(ii) For scheduled generating units, priority dispatch generating unit,</p>	<p>test and commissioning shall not be allowed, unless an extended period has been approved by the Network Service Provider. Neither shall such generation be declared as a bilateral contract quantity nor shall it be entitled to WESM payments. Any net surplus as a result of injected energy from unauthorized test and commissioning activity or operation will be treated in accordance with Clause 3.13.12 of the WESM Rules. However, the WESM Member shall still be charged for all withdrawals from the grid or distribution network, as the case may be.</p> <p>b) Dispatch of a generating unit facility to which FCATC has been released but with pending issuance of COC shall be in accordance with the following:</p> <p>(i) For its must-dispatch generating units, the Generation Company shall submit projected output to the Market Operator and comply with the applicable forecast accuracy standards; and</p>					

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		<p>and energy storage systems, the Generation Company shall submit to the Market Operator its day-ahead nomination and shall comply with the applicable dispatch conformance standards.</p> <p>Projected output and day-ahead nominations shall be submitted through the Market Operator's Market Participant Interface, which, as necessary, may be revised by the Generation Company near real-time. Compliance of generating units referred in these guidelines with the forecast accuracy standards and dispatch conformance standards, as applicable, shall be monitored by the Enforcement and Compliance Office and non-compliance shall be subject to imposition of financial penalties.</p> <p>xxxx</p> <p>e) In case the Network Service Provider did not issue an extended PCATC to the WESM Member, the PCATC shall be deemed without effect after the</p>	<p>(ii) For scheduled generating units, priority dispatch generating unit, and energy storage systems <u>battery energy storage system, pumped-storage hydropower, and integrated generating plant and ESS</u>, the Generation Company or <u>Energy Storage System</u> shall submit to the Market Operator its day-ahead nomination and shall comply with the applicable dispatch conformance standards.</p> <p>Projected output and day-ahead nominations shall be submitted through the Market Operator's Market Participant Interface, which, as necessary, may be revised by the Generation Company or <u>Energy Storage System</u> near real-time. Compliance of generating units <u>facilities</u> referred in these guidelines with the forecast accuracy standards and dispatch conformance standards, as applicable, shall</p>		-Consider the ESS Configurations as provided in General Comment 1			

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		<p>expiry date and the System Operator shall no longer impose overriding constraints on the generating unit. Any unauthorized generation shall not be allowed to be declared as bilateral contract quantity and shall not be entitled to WESM payments in accordance with Section 2.5.7.3 (a).</p> <p>f) The Network Service Provider shall immediately inform the Market Operator of any suspended validity of PCATC due to failure of the generating facility to satisfy the grid connectivity parameters required by the PGC. Suspended PCATC shall observe Section 2.5.7.3 (a). Notwithstanding the suspension of the PCATC, an extended PCATC shall be submitted within three (3) working days prior to original expiry of PCATC. Should the PCATC expire while the WESM Member is in the process of satisfying the grid connectivity parameters required by PGC or PDC, the process for the conduct of Test and Commissioning shall be reset.</p>	<p>be monitored by the Enforcement and Compliance Office and non-compliance shall be subject to imposition of financial penalties.</p> <p>xxxx</p> <p>e) In case the Network Service Provider did not issue an extended PCATC to the WESM Member, the PCATC shall be deemed without effect after the expiry date and the System Operator shall no longer impose overriding constraints on the generating unit facility. Any unauthorized generation shall not be allowed to be declared as bilateral contract quantity and shall not be entitled to WESM payments in accordance with Section 2.5.7.3 (a).</p> <p>f) The Network Service Provider shall immediately inform the Market Operator of any suspended validity of PCATC due to failure of the generating facility to satisfy the grid connectivity parameters required by the PGC. Suspended PCATC shall observe Section 2.5.7.3 (a).</p>					

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p>g) In case of changes in capacity and capabilities of the generating unit arising from the results of test and commissioning, the WESM Member shall immediately inform the Market Operator for the purpose of updating its registration details subject to provisions of Section 3.3 of this Manual.</p> <p>h) The Network Service Provider of a generating unit shall furnish the ERC and Market Operator a copy of the FCATC within three (3) calendar days from issuance thereof to the relevant WESM Member.</p> <p>i) The WESM Member shall submit to the Market Operator an application for Commercial Operations Registration of its generating unit within three (3) working days from date of receipt of its COC or Provisional Authority to Operate (PAO) from the ERC, provided that this shall not apply to embedded generation companies that are allowed to register on a voluntary basis and have opted not to register in the WESM.</p>	<p>Notwithstanding the suspension of the PCATC, an extended PCATC shall be submitted within three (3) working days prior to original expiry of PCATC. Should the PCATC expire while the WESM Member is in the process of satisfying the grid connectivity parameters required by PGC or PDC, the process for the conduct of Test and Commissioning shall be reset.</p> <p>g) In case of changes in capacity and capabilities of the generating unit facility arising from the results of test and commissioning, the WESM Member shall immediately inform the Market Operator for the purpose of updating its registration details subject to provisions of Section 3.3 of this Manual.</p> <p>h) The Network Service Provider of a generating unit facility shall furnish the ERC and Market Operator a copy of the FCATC within three (3) calendar days from issuance thereof to the relevant WESM Member.</p>					

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p>xxxx</p> <p>j) The Market Operator shall submit a monthly report on the status of the Test and Commissioning of the generating units to the Enforcement and Compliance Office, copy furnished the DOE and ERC, indicating information such as but not limited to:</p> <p>xxxx</p>	<p>i) The WESM Member shall submit to the Market Operator an application for Commercial Operations Registration of its generating unit facility within three (3) working days from date of receipt of its COC or Provisional Authority to Operate (PAO) from the ERC, provided that this shall not apply to embedded generation companies facilities that are allowed to register on a voluntary basis and have opted not to register in the WESM.</p> <p>xxxx</p> <p>j) The Market Operator shall submit a monthly report on the status of the Test and Commissioning of the generating units facilities to the Enforcement and Compliance Office, copy furnished the DOE and ERC, indicating information such as but not limited to:</p> <p>xxxx</p>					
REGISTRATION OF ANCILLARY SERVICES PROVIDERS	2.6.1.1	Persons or entities wishing to register as WESM member under this category must – a) Be registered as a Generation Company or a Customer;	Persons or entities wishing to register as WESM member under this category must – a) Be registered as a Generation Company, Energy	Added ESS and changed PSU to PSH.	-Suggest to add all ESS configurations as facilities capable to provide ESS. -Consider General			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p>xxxx</p> <p>f) For Generation Companies, only scheduled generating units, battery energy storage systems, and pumped-storage units can be registered as a reserve facility.</p>	<p><u>Storage System</u>, or a Customer;</p> <p>xxxx</p> <p>f) For Generation Companies <u>and Energy Storage Systems</u>, only scheduled generating units, battery energy storage systems, and pumped-storage units <u>hydro</u> can be registered as a reserve facility.</p>		<p>Comment 2</p> <p>As mentioned, the policy stated that ESS (in general) shall be used for the provision of Ancillary Services.</p>	<p>f) For Generation Companies <u>and Energy Storage Systems</u>, only scheduled generating units, battery energy storage systems, and pumped-storage <u>hydropower units</u> <u>units hydro</u>, <u>Generating Plant and ESS, Integrated RE Plant and ESS, and Integrated Non-RE Plant and ESS</u>, can be registered as a reserve facility.</p>		
REGISTRATION OF ANCILLARY SERVICES PROVIDERS	2.6.1.2	<p>The application for registration of a Generation Company as Ancillary Services Provider shall specify the following information for each of its reserve facility which has been issued a valid certification to provide Ancillary Services:</p> <p>a) Reserve category or categories which said generating</p>	<p>The application for registration of a Generation Company <u>or Energy Storage System</u> as <u>an</u> Ancillary Services Provider shall specify the following information for each of its reserve facility which has been issued a valid certification to provide Ancillary Services:</p> <p>a) Reserve category or categories which said</p>	Added ESS and standardized the use of the term “facility” for assets owned as generating unit or ESS facility.				

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		unit intends to trade in the WESM; xxxx	generating unit facility intends to trade in the WESM; xxxx					
Metering Services Provider	2.7.2.4	2.7.2.4. The following may not be registered as Metering Services Providers – a) A Generation Company or Customer which is involved in the trading of energy may not be registered as a Metering Services Provider in respect to any market trading node assigned to it; or xxxx	2.7.2.4. The following may not be registered as Metering Services Providers – a) A Generation Company, Energy Storage System , or Customer which is involved in the trading of energy may not be registered as a Metering Services Provider in respect to any market trading node assigned to it; or xxxx	Added ESS				
Facility-Related Changes	3.3.1	3.3.1. Registered Capacities Changes in the registered capacities (i.e., Pmin or Pmax) of a generating unit shall require confirmation by the <i>Market Operator</i> before such change can be considered in the WESM scheduling and dispatch processes.	3.3.1. Registered Capacities Capabilities Changes in the registered capacities capabilities (i.e.e.g., Pmin, or Pmax, ramp rates) of a generating unit or energy storage system shall require confirmation by the <i>Market Operator</i> before such change can be considered in the WESM scheduling and dispatch processes.	Revised to use capabilities to cover registered capacities and other maximum operating limits.	We suggest that state-of-charge limitations also be tracked/registered in the Market. This might also help address the issue in the tagging of non-compliances.			
	3.3.1.1	3.3.1.1. The <i>Trading Participant</i> wishing to change the registered capacities and/or ramp rates of its generating unit/s shall make a	3.3.1.1. The <i>Trading Participant</i> wishing to change the registered capacities capabilities and/or ramp rates of its generating	Added ESS and revised to use capabilities to cover registered				

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		request in writing to the <i>Market Operator</i> . Such changes shall be in accordance with the latest Certificate of Compliance (COC).	unit/s <u>and energy storage system/s</u> shall make a request in writing to the <i>Market Operator</i> . Such changes shall be in accordance with the latest Certificate of Compliance (COC).	capacities and other maximum operating limits.				
	3.3.1.2	Request for changes submitted by the <i>Trading Participant</i> , in connection with the registered capacities and/or ramp rates of its generating units shall be approved by the <i>Market Operator</i> on the basis of the latest Certificate of Compliance.	Request for changes submitted by the <i>Trading Participant</i> , in connection with the registered capacities <u>capabilities</u> and/or ramp rates of its generating units <u>and energy storage systems</u> shall be approved by the <i>Market Operator</i> on the basis of the latest Certificate of Compliance.	Added ESS and revised to use capabilities to cover registered capacities and other maximum operating limits.				
	3.3.1.3	The <i>Market Operator</i> shall notify the <i>PEM Board, ERC</i> and <i>DOE</i> of any changes in the registered capacities and/or ramp rates of <i>generating units</i> in the <i>WESM</i> .	The <i>Market Operator</i> shall notify the <i>PEM Board, ERC</i> and <i>DOE</i> of any changes in the registered capacities <u>capabilities</u> and/or ramp rates of <i>generating units and energy storage systems</i> in the <i>WESM</i> .	Added ESS and revised to use capabilities to cover registered capacities and other maximum operating limits.				
Re-classification of generating units and ESS	3.3.2	3.3.2. Re-classification of generation units	3.3.2. Re-classification of generation units <u>generating units and energy storage systems</u>	Revised to use generating units. Added ESS.				
Re-classification of generating units and ESS	3.3.2.1	The <i>Trading Participant</i> under whom a generating unit is registered in the <i>WESM</i> may request for the reclassification of such unit (i.e., <i>scheduled, non-scheduled, must dispatch</i> or	The <i>Trading Participant</i> under whom a generating unit <u>or energy storage system</u> is registered in the <i>WESM</i> may request for the reclassification of such unit (i.e., <i>scheduled, non-</i>	Added ESS and integrated generating plant and ESS.	-Consider General Comment 1 on the classification of facilities			

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		<i>priority dispatch</i>) by submitting to the <i>Market Operator</i> a request in writing supported by documents and information as would enable the <i>Market Operator</i> to evaluate the request.	<i>scheduled, must dispatch or priority dispatch, <u>integrated generating plant and ESS</u></i> by submitting to the <i>Market Operator</i> a request in writing supported by documents and information as would enable the <i>Market Operator</i> to evaluate the request.					
Re-classification of generating units and ESS	3.3.2.2	The <i>Market Operator</i> shall approve the reclassification subject to the conditions set forth in <i>WESM Rules</i> section 2.3.1, and relevant prevailing rules, regulations and issuances, and in consultation with the <i>System Operator</i> .	The <i>Market Operator</i> shall approve the reclassification subject to the conditions set forth in <i>WESM Rules</i> section 2.3.1 and 2.3.8 , and relevant prevailing rules, regulations and issuances, and in consultation with the <i>System Operator</i> .	Included new section for ESS.				
Representation in the Market Network Model	3.3.3.1	Changes in the manner of representation of any generating unit or customer facility in the <i>Market Network Model</i> may be initiated by the <i>Trading Participant</i> transacting such facilities in <i>the WESM</i> .	Changes in the manner of representation of any generating unit, <u>energy storage system</u> , or customer facility in the <i>Market Network Model</i> may be initiated by the <i>Trading Participant</i> transacting such facilities in <i>the WESM</i> .					
Transfer of Registration of Facilities	3.3.5.1	A generation facility or unit or a customer facility registered under one <i>WESM Member</i> may be transferred to another person or entity that meets the criteria and qualifications to be registered as a <i>WESM Member</i> and <i>Trading Participant</i> .	A generation facility or <u>generating unit, energy storage system</u> , or a customer facility registered under one <i>WESM Member</i> may be transferred to another person or entity that meets the criteria and qualifications to be registered as	Added ESS.				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			a WESM Member and Trading Participant.					
New Energy Storage System	3.3.8	(new)	<p><u>New Energy Storage System</u></p> <p><u>3.3.8.1. A registered <i>Energy Storage System</i> that has a new facility and intends to trade its capacity through a separate market trading node shall have it registered as a new facility.</u></p> <p><u>3.3.8.2. The registered <i>Energy Storage System</i> shall comply with the technical and commercial requirements under Section 2.5.3 and the procedures under Sections 2.5.4, 2.5.5, 2.5.6 and 2.5.7 for the registration of its new facility.</u></p> <p><u>3.3.8.3. The <i>Market Operator</i> shall assess and approve the request for the registration, on applicable phases, of new facility in accordance with the procedures under Sections 2.5.6, 2.5.7, and 2.5.8.</u></p>	New section for ESS.				
Enrolment and De-listing of Supply Customers	3.5.1.2	3.5.1.2. The notice to the <i>Market Operator</i> shall include the following -	The notice to the <i>Market Operator</i> shall include the following -	Included ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p>a) details on the duration of the supply contract;</p> <p>xxxx</p> <p>f) for <i>Replacement Power Arrangements</i> between <i>Generation Companies</i>, copy of the supply contract; and</p> <p>g) for supply to an <i>Indirect WESM Member</i> through its <i>Direct WESM Member</i> that is a <i>Generation Company</i>, written confirmation by the <i>Indirect WESM Member</i> of the notice and the foregoing information.</p>	<p>a) details on the duration of the supply contract;</p> <p>xxxx</p> <p>f) for <i>Replacement Power Arrangements</i> between <i>Generation Companies</i> <u>and/or Energy Storage Systems</u>, copy of the supply contract; and</p> <p>g) for supply to an <i>Indirect WESM Member</i> through its <i>Direct WESM Member</i> that is a <i>Generation Company</i> <u>or an Energy Storage System</u>, written confirmation by the <i>Indirect WESM Member</i> of the notice and the foregoing information</p>					
	3.5.1.5	<p><i>Generation Companies</i> may register other <i>Generation Companies</i> or <i>Customer Trading Participants</i>, except for <i>Contestable Customers</i>, as <i>Supply Customers</i>. A <i>Generation Company</i> can only enroll another <i>Generation Company</i> as a <i>Supply Customer</i> if:</p> <p>a) the <i>Generation Companies</i> have entered into a <i>Replacement Power Arrangement</i>; or</p>	<p><i>Generation Companies</i> <u>and Energy Storage Systems</u> may register <u>enroll</u> other <i>Generation Companies</i>, <u>Energy Storage Systems</u>, or <i>Customer Trading Participants</i>, except for <i>Contestable Customers</i>, as <i>Supply Customers</i>. A <i>Generation Company</i> <u>or Energy Storage System</u> can only enroll another <i>Generation Company</i> <u>or Energy Storage System</u> as a <i>Supply Customer</i> if:</p>	Changed register to enroll for consistency and clarity.				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		b) the <i>Generation Company</i> acting as the <i>Supply Customer</i> is the designated <i>Direct WESM Member</i> of an <i>Indirect WESM Member</i> that has a contract with the enrolling <i>Generation Company</i> .	a) the <i>Generation Companies</i> <u>or Energy Storage Systems</u> have entered into a <i>Replacement Power Arrangement</i> ; or b) the <i>Generation Company</i> <u>or Energy Storage System</u> acting as the <i>Supply Customer</i> is the designated <i>Direct WESM Member</i> of an <i>Indirect WESM Member</i> that has a contract with the enrolling <i>Generation Company</i> .					
	3.5.1.6	Prior to providing the notice under Clause 3.5.1.3, the <i>Market Operator</i> shall verify that <i>Generation Companies</i> that wish to enroll <i>Renewable Energy Suppliers</i> as <i>supply customers</i> must own, control or operate <i>generation unit/s</i> that are all producing electricity using renewable energy resources.	Prior to providing the notice under Clause 3.5.1.3, the <i>Market Operator</i> shall verify that <i>Generation Companies</i> <u>or Energy Storage Systems</u> that wish to enroll <i>Renewable Energy Suppliers</i> as <i>supply customers</i> must own, control or operate <i>generation unit/s</i> <u>facilities</u> that are all producing electricity using renewable energy resources.	Included ESS and used facilities.	Please confirm that 1. Generating Plant (RE) and ESS; and 2. Integrated RE and ESS will be allowed to enroll RE Suppliers as supply customers for GEOP.			
Cessation of Registration	5.2.1.3	If the <i>WESM member</i> wishes to cease to be registered as a <i>Trading Participant</i> as a result of the retirement or closure of its generation or customer facilities that are injecting or withdrawing power from the grid, it shall likewise cause the disconnection of such facilities from the transmission or distribution	If the <i>WESM member</i> wishes to cease to be registered as a <i>Trading Participant</i> as a result of the retirement or closure of its generation or customer facilities that are injecting or withdrawing power from the grid, it shall likewise cause the disconnection of such facilities from the transmission or					

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		system to which these are connected. The notice to be submitted to the <i>Market Operator</i> shall be accompanied by proof of such disconnection.	distribution system to which these are connected. The notice to be submitted to the <i>Market Operator</i> shall be accompanied by proof of such disconnection.					
Issuance of Notices of De-Registration and Disconnection	5.4.2.2	If the <i>WESM member</i> is a <i>Generation Company</i> or a <i>Customer</i> with facilities connected to the grid and is being de-registered pursuant to the WESM Rules or market manuals, the <i>Market Operator</i> shall simultaneously issue a notice of disconnection to the <i>WESM Member</i> to be deregistered and a request for disconnection to the <i>National Grid Corporation of the Philippines</i> (the “ <i>NGCP</i> ”) or relevant <i>Network Service Provider</i> . The issuance of the notice and request for disconnection shall be in accordance with prevailing rules and regulations on disconnection.	If the <i>WESM member</i> is a <i>Generation Company</i> , <i>Energy Storage System</i> , or a <i>Customer</i> with facilities connected to the grid and is being de-registered pursuant to the WESM Rules or market manuals, the <i>Market Operator</i> shall simultaneously issue a notice of disconnection to the <i>WESM Member</i> to be deregistered and a request for disconnection to the <i>National Grid Corporation of the Philippines</i> (the “ <i>NGCP</i> ”) or relevant <i>Network Service Provider</i> . The issuance of the notice and request for disconnection shall be in accordance with prevailing rules and regulations on disconnection.	Included ESS.				
Effects of Deregistration	5.6.2	Deregistration shall also result in the disconnection of the relevant generation or customer facilities from the transmission or distribution system under the following circumstances -	Deregistration shall also result in the disconnection of the relevant generation or customer facilities from the transmission or distribution system under the following circumstances -	Revised to use “facilities”				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Effects of Deregistration	5.6.2.1	The <i>WESM member</i> was deregistered as a <i>Generation Company</i> or <i>Customer</i> ; or	The <i>WESM member</i> was deregistered as a <i>Generation Company</i> , <u>Energy Storage System</u> , or <i>Customer</i> ; or	Included ESS.				
Appendix A Glossary of Terms		<p>Certificate of Compliance</p> <p>Certificate issued by the Energy Regulatory Commission to generation companies or facilities authorizing and setting conditions for the operations of the generation companies or facilities</p>	<p>Certificate of Compliance</p> <p>Certificate issued by the Energy Regulatory Commission to generation companies or facilities <u>authorizing and setting the conditions for the operations of the facilities of Generation Companies and Energy Storage Systems</u> authorizing and setting conditions for the operations of the generation companies or facilities</p>	Revised definition to consider ESS.				
Appendix A Glossary of Terms		<p>Replacement Power Arrangement</p> <p>Agreement entered by a <i>generation company</i> with another <i>generation company</i> for delivery of electricity by the purchasing <i>generation company</i> to its customers when its power plant is on outage or supply deration due to seasonal dependency or resource intermittency</p>	<p>Replacement Power Arrangement</p> <p>Agreement entered by a <i>generation company</i> <u>or energy storage system</u> with another <i>generation company</i> <u>or energy storage system</u> for delivery of electricity by the purchasing <i>generation company</i> <u>or energy storage system</u> to its customers when its power plant is on outage or supply deration due to seasonal dependency or resource intermittency</p>	Included ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Appendix A Glossary of Terms		Supply Customer Customers connected to the grid that are being supplied electricity by Generation Companies or Wholesale Aggregators under any power supply agreement or contract.	Supply Customer Customers connected to the grid that are being supplied electricity by Generation Companies, <u>Energy Storage Systems</u> , or Wholesale Aggregators under any power supply agreement or contract.	Included ESS				
Appendix A Glossary of Terms		Test and Commissioning Refers to the conduct of procedures to determine and certify that a generating unit was connected to the grid in accordance with the Philippine Grid Code (PGC), Philippine Distribution Code (PDC) and other relevant guidelines and specifications and to determine readiness to deliver energy to Grid or distribution network for the purpose of securing a COC from the ERC.	Test and Commissioning Refers to the conduct of procedures to determine and certify that a generating unit <u>or energy storage system</u> was connected to the grid in accordance with the Philippine Grid Code (PGC), Philippine Distribution Code (PDC) and other relevant guidelines and specifications and to determine readiness to deliver energy to Grid or distribution network for the purpose of securing a COC from the ERC.	Included ESS				
Appendix A Glossary of Terms		Wholesale Aggregator Any person or entity, other than a Generation Company issued a Certificate of Registration by the ERC to sell electricity to Distribution Utilities	Wholesale Aggregator Any person or entity, other than a Generation Company <u>or Energy Storage System</u> issued a Certificate of Registration by the ERC to sell electricity to Distribution Utilities	Included ESS				

C. WESM Manual on Market Network Model Development and Maintenance – Criteria and Procedures Issue 8.0

WESM Manual on Market Network Model Development and Maintenance – Criteria and Procedures Issue 8.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Definition, References, and Interpretation	2.1.5	<i>Market Resources</i> refers to the objects defined in the Market Network Model to represent <i>generators, battery energy storage systems, pumped-storage units, and loads.</i>	<i>Market Resources</i> refers to the objects defined in the Market Network Model to represent <i>generators, battery energy storage systems, pumped-storage units <u>hydro, integrated generating plant and ESS</u>, and loads.</i>	Revised PSU to PSH. Added Integrated Generating Plant and ESS.	- Consider all ESS Configurations as provided in General Comment 1 -Consider General Comment 2 re: PSH <u>unit</u>			
Market Network Model Development	4.1.3	The components of the MNM interact with one another in accordance with dispatch schedule of the generating <i>units, battery energy storage systems, pumped-storage units, customer</i> demand and the physical laws that govern the operation of the network components. These interactions are complex by nature but should be balanced to maintain the reliable and secure operation of the power system by the System Operator, as well as for the generation of fair and economic market dispatch schedules and nodal energy price.	The components of the MNM interact with one another in accordance with dispatch schedule of the <i>generating units, battery energy storage systems, pumped-storage units <u>hydro, integrated generating plant and ESS</u>, customer</i> demand and the physical laws that govern the operation of the network components. These interactions are complex by nature but should be balanced to maintain the reliable and secure operation of the power system by the System Operator, as well as for the generation of fair and economic market dispatch schedules and nodal energy price.	Revised PSU to PSH. Added Integrated Generating Plant and ESS.	- Consider all ESS Configurations as provided in General Comment 1 - Consider General Comment 2 re: PSH <u>unit</u>			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Market Trading Nodes	4.4.1	These are nodes in the load flow model designated as the reckoning node for settlement of energy and reserves of Trading Participants. MTN shall be modeled as the trading point of a generating unit, battery energy storage systems, pumped-storage unit or a Load corresponding to its connection point. Where the MTN and the metering point are of different location, site-specific loss adjustment (SSLA) provided in the WESM Metering Market Manual shall apply. Further details on MTN can be viewed in Section 6 of this Market Manual.	These are nodes in the load flow model designated as the reckoning node for settlement of energy and reserves of Trading Participants. MTN shall be modeled as the trading point of a generating unit, battery energy storage systems, pumped-storage unit <u>hydro, integrated generating plant and ESS</u> , or a Load corresponding to its connection point. Where the MTN and the metering point are of different location, site-specific loss adjustment (SSLA) provided in the WESM Metering Market Manual shall apply. Further details on MTN can be viewed in Section 6 of this Market Manual.	Revised PSU to PSH. Added Integrated Generating Plant and ESS.	- Consider all ESS Configurations as provided in General Comment 1 - Consider General Comment 2 re: PSH <u>unit</u>			
Market Trading Nodes	4.4.13	Representations of Pumped-Storage Unit Market Resources This is the mathematical model of a pumped-storage unit with its dual capability of injecting or withdrawing power through the network.	Representations of Pumped-Storage Unit <u>Hydro</u> Market Resources This is the mathematical model of a pumped-storage unit with its dual capability of injecting or withdrawing power through the network.	Revised PSU to PSH.	- Consider General Comment 2 re: PSH <u>unit</u>			
Market Trading Nodes	4.4.13	(new)	<u>Representations of Integrated Generating Plant and ESS Resources</u>	Added new section on Integrated Generating Plant and ESS.	This should include other ESS configurations as provided under			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<u>This is the mathematical model of an <i>integrated generating plant and ESS</i> with its dual capability of injecting or withdrawing power through the network.</u>		General Comment 1. Additionally, for Generating Plant (RE) and ESS, which withdraws power from the grid, this should still be able to avail of RE incentives up to the extent that the ESS is charged from the RE facility.			
MNM Development Timetable	Item 1	<u>Description</u> At the very least, the technical requirements indicated in the WESM Market Manual on Registration, Suspension and De-Registration Criteria and Procedures for new generators, battery energy storage systems, or pumped-storage units should be provided. The same requirements are also required when requesting for the remodelling of facilities (i.e. aggregation of disaggregation of resources).	<u>Description</u> At the very least, the technical requirements indicated in the WESM Market Manual on Registration, Suspension and De-Registration Criteria and Procedures for new generators, battery energy storage systems, or pumped-storage units <u>hydro, or integrated generating plant and ESS</u> should be provided. The same requirements are also required when requesting for the remodelling of facilities (i.e. aggregation of <u>or</u> disaggregation of resources).	Revised PSU to PSH. Added Integrated Generating Plant and ESS.	- Consider all ESS Configurations as provided in General Comment 1 - Consider General Comment 2 re: PSH <u>unit</u>			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Types of Market Resources	6.3.1	<p>Market Resources can be classified as:</p> <p>xxxx</p> <p>d) Pumped-Storage Unit resources – resources that represent a registered pumped-storage unit directly connected to a network operated by the System Operator. It is a resource where power is injected or withdrawn through the transmission network.</p>	<p>Market Resources can be classified as:</p> <p>xxxx</p> <p>d) Pumped-Storage Unit Hydro resources – resources that represent a registered pumped-storage unit directly connected to a network operated by the System Operator. It is a resource where power is injected or withdrawn through the transmission network.</p> <p><u>e) Integrated Generating Plant and ESS resources – resources in the <i>market network model</i> that represent a registered integrated facility of a generating plant and battery energy storage system that is connected to a <i>transmission or distribution network</i>.</u></p>	Revised PSU to PSH. Added Integrated Generating Plant and ESS.	<p>- Consider all ESS Configurations as provided in General Comment 1</p> <p>- Consider General Comment 2 re: PSH <u>unit</u></p>			
Market Resources	6.8	<p>6.8 PUMPED-STORAGE UNIT MARKET RESOURCE</p> <p>6.8.1. During the registration of the pumped- storage unit resource, the Trading Participant shall specify if the scheduling point should represent the gross MW output of the generator or at the same location as the market</p>	<p>6.8 PUMPED-STORAGE UNIT HYDRO MARKET RESOURCE</p> <p>6.8.1. During the registration of the pumped-storage unit hydro resource, the Trading Participant shall specify if the scheduling point should represent the gross MW output of the generator or at the same location as the market</p>	Revised PSU to PSH and clarified offers only during generation mode.	-Consider General Comment 2			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		trading node (i.e. at the connection point, which is at the connection point and net of its station use. The location of the scheduling point shall be the reference point for the registered capacity, submission of generation offers and self-scheduled nominations, scheduling, dispatch, and dispatch compliance monitoring. 6.8.2. The information that should be submitted by the generators in their energy supply and reserve offers are enumerated in Appendix A1.1 of the WESM Rules. 6.8.3. During the registration of the pumped-storage unit resource, Trading Participants shall specify if its availability shall be based on the real-time status of its connecting breaker, or on the availability of its market offers.	trading node (i.e. at the connection point, which is at the connection point and net of its station use. The location of the scheduling point shall be the reference point for the registered capacity, submission of generation offers and self-scheduled nominations, scheduling, dispatch, and dispatch compliance monitoring. 6.8.2. The information that should be submitted by the generators <u>Trading Participants during generation mode</u> in their energy supply and reserve offers are enumerated in Appendix A1.1 of the WESM Rules. 6.8.3. During the registration of the pumped-storage unit <u>hydro</u> resource, Trading Participants shall specify if its availability shall be based on the real-time status of its connecting breaker, or on the availability of its market offers.					
Market Resources	6.9	(new)	<u>6.9 INTEGRATED GENERATING PLANT AND ESS MARKET RESOURCE</u> <u>6.9.1. During the registration of the market resource for the integrated generating plant and ESS, the Trading Participant</u>	New section on Integrated Generating Plant and ESS.	- Consider General Comment 1 to account for other ESS configurations			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<p><u>shall specify if the scheduling point should represent the gross MW output of the <i>facility</i> or at the same location as the market trading node (i.e. at the connection point). The location of the scheduling point shall be the reference point for the registered capability, submission of generation offers and self-scheduled nominations, scheduling, dispatch, and dispatch compliance monitoring.</u></p> <p><u>6.9.2. If the battery <i>facility</i> of the <i>integrated generating plant and ESS</i> shall charge and discharge from the same <i>connection point</i> as the <i>generating unit</i>, then the <i>integrated generating plant and ESS</i> shall be modeled as a single market resource at the very least.</u></p> <p><u>6.9.3. If the battery <i>facility</i> of the <i>integrated generating plant and ESS</i> shall charge separately from a different <i>connection point</i> as the <i>generating unit</i>, then a separate load market resource shall be</u></p>		<p>Clause 6.9.3 on <i>charging via a separate connection point</i> seems ambiguous, given the clause on registration [2.3.8.5 (a)] that all facilities are connected at a common point. Would this mean, that the ESS will have a separate load resource node to represent the projected MW</p>			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<p><u>modelled aside from the integrated generating plant and ESS market resource. This load market resource shall represent the projected MW charging of the battery facility.</u></p> <p><u>6.9.4. The information that should be submitted by Trading Participants during generation mode in their energy supply and reserve offers are enumerated in Appendix A1.1 of the WESM Rules.</u></p> <p><u>6.9.5. During the registration of the market resource for the integrated generating plant and ESS, Trading Participants shall specify if its availability shall be based on the real-time status of its main connecting breaker, or from its market offers.</u></p>		charging of the ESS facility from the grid, similar to how Kalayaan was modelled a resource node at P01 for unit 1's pump load?			
Market Resources	6.10	6.9 PROCEDURE FOR REGISTRATION OF MARKET RESOURCES 6.9.1 xxxx 6.9.2 xxxx	6.9 10 PROCEDURE FOR REGISTRATION OF MARKET RESOURCES 6.9 10 .1 xxxx 6.9 10 .2 xxxx	Renumbered				

D. WESM Manual on Dispatch Protocol Issue 21.0

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Overview on WESM Operations	1.1.3	By considering the <i>power system's</i> topology and characteristics through the <i>market network model</i> , the <i>real-time dispatch</i> (RTD) schedules generated by the <i>Market Operator</i> are security-constrained economic <i>dispatch schedules</i> . The <i>Market Operator</i> likewise prepares a <i>WESM merit order table</i> (WMOT) that presents the list of available <i>generating units</i> ranked in accordance with the <i>offer</i> prices submitted for these units. The <i>WMOT</i> is submitted to the <i>System Operator</i> as a guide in constraining off and on generating units whenever there is a deviation in real-time after <i>reserves</i> are exhausted. Post-dispatch reports are thereafter relayed by the <i>System Operator</i> to the <i>Market Operator</i> .	By considering the <i>power system's</i> topology and characteristics through the <i>market network model</i> , the <i>real-time dispatch</i> (RTD) schedules generated by the <i>Market Operator</i> are security-constrained economic <i>dispatch schedules</i> . The <i>Market Operator</i> likewise prepares a <i>WESM merit order table</i> (WMOT) that presents the list of available <i>generating units facilities</i> ranked in accordance with the <i>offer</i> prices submitted for these units. The <i>WMOT</i> is submitted to the <i>System Operator</i> as a guide in constraining off and on generating <i>units facilities</i> whenever there is a deviation in real-time after <i>reserves</i> are exhausted. Post-dispatch reports are thereafter relayed by the <i>System Operator</i> to the <i>Market Operator</i> .	Replaced generating units to generating facilities to consider ESS in generation mode.				
Scope of WESM Operations	1.3.1	1.3.1 In accordance with <i>WESM Rules</i> Chapters 3 and 6, this Dispatch Protocol covers the following procedures for <i>dispatch</i> scheduling and implementation during normal system conditions and <i>emergency</i> conditions: a. Submission and processing of <i>bids</i> and <i>offers</i> ; xxxx	1.3.1 In accordance with <i>WESM Rules</i> Chapters 3 and 6, this Dispatch Protocol covers the following procedures for <i>dispatch</i> scheduling and implementation during normal system conditions and <i>emergency</i> conditions: a. Submission and processing of <i>bids</i> and <i>offers</i> ; xxxx	Included ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		g. <i>Start-up and shutdown of generating units;</i>	g. <i>Start-up and shutdown of generating units and energy storage systems;</i>					
Definitions, References, and Interpretation	2.1.2	<p>xxxx</p> <p>e. Capability. Highest power that a specified <i>generating unit</i> can deliver and sustain whenever called upon.</p> <p>xxxx</p> <p>h. Contingency Reserve. Synchronized generation capacity from qualified <i>generating units</i> and qualified <i>interruptible loads</i> allocated to cover the loss or failure of a synchronized <i>generating unit</i> or a transmission element or the power import from a circuit interconnection.</p> <p>xxxx</p> <p>gg. Start-up. The synchronization of a <i>generating unit</i> to the <i>grid</i> from its <i>outage</i> state (closing of <i>generator</i> circuit breakers).</p>	<p>xxxx</p> <p>e. Capability. Highest power Operating limits that a specified <i>generating unit</i> facility can deliver and sustain whenever called upon.</p> <p>xxxx</p> <p>h. Contingency Reserve. Synchronized generation capacity from qualified <i>generating units</i>, <i>energy storage systems</i>, and qualified <i>interruptible loads</i> allocated to cover the loss or failure of a synchronized <i>generating unit</i> or a transmission element or the power import from a circuit interconnection.</p> <p>xxxx</p> <p>gg. Start-up. The synchronization of a <i>generating unit</i> or <i>energy storage system</i> to the <i>grid</i> from its <i>outage</i> state (closing of <i>generator</i> circuit breakers).</p>	<p>Revised definition of capability.</p> <p>Added ESS for scheduling as Contingency Reserve.</p> <p>Added ESS in items for start-up.</p>	<p>We suggest the addition of ‘energy storge systems’ including all ESS configurations provided in the policy, to qualified providers of Frequency Control Ancillary Services.</p>			
Responsibilities	3.3.2	<i>Scheduled Generation Companies</i> are required to operate their <i>generating units</i> in accordance with the scheduling and <i>dispatch</i> procedures described in Chapter 3 of the <i>WESM Rules</i> .	<i>Scheduled Generation Companies</i> <i>and Energy Storage Systems</i> are required to operate their <i>generating units</i> <i>facilities</i> in accordance with the scheduling and <i>dispatch</i> procedures	Revised to add ESS and standardized the use of				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			described in Chapter 3 of the <i>WESM Rules</i> .	the term facility.				
Background for Market Offers	6.1.1	<i>WESM Rules</i> Clause 3.5 provides for the rules in respect of the submission of <i>market offers</i> . Under said section, each <i>Scheduled Generation Company</i> including those with <i>bilateral contracts</i> shall submit standing profiles of <i>market offers</i> for each of its <i>scheduled generating units</i> for each one (1) hour interval. Non-scheduled <i>Generation Companies</i> , meanwhile, shall submit standing profiles of the schedule of the <i>loading levels</i> for each of its <i>non-scheduled generating units</i> , while <i>Generation Companies</i> in respect of their <i>Must dispatch generating units</i> and <i>priority dispatch generating units</i> shall submit standing <i>projected outputs</i> of their <i>generating units</i> .	<i>WESM Rules</i> Clause 3.5 provides for the rules in respect of the submission of <i>market offers</i> . Under said section, each <i>Scheduled Generation Company</i> or <u>Energy Storage System</u> including those with <i>bilateral contracts</i> shall submit standing profiles of <i>market offers</i> for each of its <i>scheduled generating units</i> <u>facility</u> for each one (1) hour interval. Non-scheduled <i>Generation Companies</i> , meanwhile, shall submit standing profiles of the schedule of the <i>loading levels</i> for each of its <i>non-scheduled generating units</i> , while <i>Generation Companies</i> in respect of their <i>Must dispatch generating units</i> and <i>priority dispatch generating units</i> shall submit standing <i>projected outputs</i> of their <i>generating units</i> .	Revised to add ESS and standardized the use of the term facility.				
Background on Market Offers	6.1.8	<i>WESM Rules</i> Clause 3.5.11.5 requires <i>Trading Participants</i> to revise their <i>bids</i> or <i>offers</i> if they no longer represent a reasonable estimate of either the <i>status</i> (e.g., <i>generator</i> circuit breaker status, offline state) for the <i>dispatch interval</i> of the relevant <i>generating unit</i> , the capacity that can be attained taking into account the <i>ramp rate</i> limitations of the <i>generating unit</i> during the relevant <i>dispatch interval</i> , or <i>scheduled load</i> or <i>bids</i> or <i>offers</i> likely to apply in the <i>real-</i>	<i>WESM Rules</i> Clause 3.5.11.5 requires <i>Trading Participants</i> to revise their <i>bids</i> or <i>offers</i> if they no longer represent a reasonable estimate of either the <i>status</i> (e.g., <i>generator</i> circuit breaker status, offline state) for the <i>dispatch interval</i> of the relevant <i>generating unit</i> <u>facility</u> , the capacity that can be attained taking into account the <i>ramp rate</i> limitations of the <i>generating unit</i> <u>facility</u> during the relevant <i>dispatch interval</i> , or <i>scheduled load</i> or <i>bids</i> or <i>offers</i> likely to apply in the	Revised to standardize the use of the term facility.				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<i>time dispatch</i> optimization for the <i>dispatch interval</i> .	<i>real-time dispatch</i> optimization for the <i>dispatch interval</i> .					
Background on Market Offers	6.1.9	Pursuant to <i>WESM Rules</i> Clause 3.5.11.6, <i>Trading Participants</i> that cancel their <i>bids</i> or <i>offers</i> , or submit <i>bids</i> or <i>offers</i> less than the <i>maximum stable load (Pmax)</i> or <i>available capacity</i> of their <i>facility</i> or <i>generating unit</i> are required to provide justifiable reasons or circumstances of such cancellation or submission.	Pursuant to <i>WESM Rules</i> Clause 3.5.11.6, <i>Trading Participants</i> that cancel their <i>bids</i> or <i>offers</i> , or submit <i>bids</i> or <i>offers</i> less than the <i>maximum stable load (Pmax)</i> or <i>available capacity</i> of their <i>facility</i> or <i>generating unit</i> are required to provide justifiable reasons or circumstances of such cancellation or submission.	Revised to standardize the use of the term facility.				
Categories of Self-scheduled Nominations, Bids, and Offers	6.4.1	The <i>self-scheduled nominations, bids, and offers</i> that can be submitted in the <i>WESM</i> are as follows: a. Real-time <i>market offers</i> for <i>scheduled generating units</i> of <i>Scheduled Generation Companies</i> ; b. Operating <i>reserves offers</i> for certified <i>ancillary service providers</i> ; c. <i>Demand bids</i> from customer <i>Trading Participants</i> ; and d. <i>Self-scheduled nominations</i>	The <i>self-scheduled nominations, bids, and offers</i> that can be submitted in the <i>WESM</i> are as follows: a. Real-time <i>market offers</i> for <i>scheduled generating units</i> , <u>battery energy storage systems, pumped-storage hydropower, and integrated generating plant and ESS of Trading Participants</u> of <i>Scheduled Generation Companies</i> ; <u>and</u> b. Operating <i>reserves offers</i> for certified <i>ancillary service providers</i> ; <u>and</u> c. <i>Demand bids</i> from customer <i>Trading Participants</i> ; and d. <i>Self-scheduled nominations</i>	Added all ESS types.	Consider all ESS configurations as provided in General Comment 1			
Formats and Contents of Submission for Market Offers	6.9.2	<i>Trading Participants</i> shall provide the following information when submitting market offers: a. May include up to ten (10) market offer blocks per (aggregate) unit. The <i>maximum combined capacity of generation and reserve offers must not</i>	<i>Trading Participants</i> shall provide the following information when submitting market offers <u>for scheduled generating units, pumped-storage hydropower, and integrated generating plant and ESS on generation mode:</u>	Added all ESS types.	Consider all ESS configurations as provided in General Comment 1			

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		<p><i>be less than the available capacity of the generator;</i></p> <p>xxxx</p>	<p><i>a. May include up to ten (10) market offer blocks per (aggregate) unit. The maximum combined capacity of generation and reserve offers must not be less than the available capacity of the generator;</i></p> <p>xxxx</p>					
Revisions of Self-scheduled Nominations, Bids and Offers Based on Reasonable Estimates	6.13	<p><i>Trading Participants shall revise their self-scheduled nominations, bids, or offers, if the self-scheduled nominations, bids or offers submitted no longer represent a reasonable estimate of either the following:</i></p> <p>a. The status (e.g., generator circuit breaker status, outage) for the <i>dispatch interval</i> of the relevant <i>generating unit</i> or <i>scheduled load</i>; or</p> <p>b. The capacity that can be attained taking into account the <i>ramp rate</i> limitations of the <i>generating unit</i> during the relevant <i>dispatch interval</i>; or</p> <p>c. The <i>loading level, projected output, bid</i> or <i>offer</i> likely to apply in the <i>real-time dispatch</i> optimization for the <i>dispatch interval</i>.</p>	<p><i>Trading Participants shall revise their self-scheduled nominations, bids, or offers, if the self-scheduled nominations, bids or offers submitted no longer represent a reasonable estimate of either the following:</i></p> <p>a. The status (e.g., generator circuit breaker status, outage) for the <i>dispatch interval</i> of the relevant <i>generating unit, <u>energy storage system</u></i>, or <i>scheduled load</i>; or</p> <p>b. The capacity that can be attained taking into account the <i>ramp rate</i> limitations of the <i>generating unit</i> <i>facility</i> during the relevant <i>dispatch interval</i>; or</p> <p>c. The <i>loading level, projected output, bid</i> or <i>offer</i> likely to apply in the <i>real-time dispatch</i> optimization for the <i>dispatch interval</i>.</p>	Revised to add ESS and standardize the use of the term facility.				
Report of Material Adverse Change in State of Trading	6.14.4	<p>The following is a non-exhaustive list of the material adverse changes to be reported by the <i>Trading Participants</i>:</p> <p>a. Inadvertent omissions or cancellation of <i>self-scheduled nominations, bids</i>, and <i>offers</i> of significant quantity relative to</p>	<p>The following is a non-exhaustive list of the material adverse changes to be reported by the <i>Trading Participants</i>:</p> <p>a. Inadvertent omissions or cancellation of <i>self-scheduled nominations, bids</i>, and <i>offers</i> of significant quantity relative to</p>	Added all ESS types.	Consider other ESS configurations as provided in General Comment 1			

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Participant Facilities		<p>the demand in the specific <i>dispatch interval</i> for which such <i>self-scheduled nominations, bids, or offers</i> apply.</p> <p>xxxx</p> <p>g. A significant event that is expected to cause the <i>Trading Participant</i> to cancel or revise its standing <i>self-scheduled nominations, bids or offers</i>, or to submit <i>offers</i> for <i>scheduled generating units</i> that are less than the registered maximum capacities of said units.</p>	<p>the demand in the specific <i>dispatch interval</i> for which such <i>self-scheduled nominations, bids, or offers</i> apply.</p> <p>xxxx</p> <p>g. A significant event that is expected to cause the <i>Trading Participant</i> to cancel or revise its standing <i>self-scheduled nominations, bids or offers</i>, or to submit <i>offers</i> for <i>scheduled generating units, <u>battery energy storage systems, pumped-storage hydropower, and integrated generating plant and ESS</u></i> that are less than the registered maximum capacities of said units.</p>		Also, as mentioned in our previous comments, we suggest that monitoring of compliance of ESS consider the SoC level given that it affects the plant capability to reach/comply with its RTD schedule.			
SYSTEM OPERATOR INPUT DATA AND REPORTS	7.3.4	The <i>Trading Participants</i> shall ensure timely submission to the <i>System Operator</i> of their requests and schedules for <i>outages</i> of their <i>generating units</i> , in accordance with the <i>Grid Code</i> .	The <i>Trading Participants</i> shall ensure timely submission to the <i>System Operator</i> of their requests and schedules for <i>outages</i> of their <i>generating units</i> <u>and energy storage systems</u> , in accordance with the <i>Grid Code</i> .	Added ESS				
SYSTEM OPERATOR INPUT DATA AND REPORTS	7.5.1	<p>The approved <i>outage</i> schedules that shall be provided by the <i>System Operator</i> to the <i>Market Operator</i> through data exchange communication facilities shall be for the following types of equipment:</p> <p>a. <i>Generating units</i>;</p> <p>b. <i>Transmission lines</i>; and</p> <p>c. Sub-station equipment</p>	<p>The approved <i>outage</i> schedules that shall be provided by the <i>System Operator</i> to the <i>Market Operator</i> through data exchange communication facilities shall be for the following types of equipment:</p> <p>a. <i>Generating units</i>;</p> <p>b. <i>Transmission lines</i>;</p> <p>c. Sub-station equipment; and</p> <p><u>d. Energy Storage Systems</u></p>	Added ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
SYSTEM OPERATOR INPUT DATA AND REPORTS	7.6.2	<p>The types of <i>over-riding constraints</i> that may be imposed in the MDOM include the following:</p> <p>a. <i>Security</i> Limits - The <i>System Operator</i> may impose <i>security</i> limits to override the <i>market offers</i> and address possible threats in <i>system security</i>.</p> <p>i. <i>Generation</i> Limits – involves the minimum and maximum operating limits for <i>generation</i>. <i>Security</i> limits for <i>generating units</i> shall also include scheduled <i>must-run units</i> in accordance with the selection criteria in section 17.2 of this Dispatch Protocol.</p> <p>ii. Branch Group Limits – involves the maximum flow that may pass through a certain group of <i>transmission lines</i></p> <p>iii. Transmission Limits – involves the maximum flow that may pass through a specific line or transformer or <i>HVDC</i></p> <p>iv. Other types as may be recommended by the <i>System Operator</i></p> <p>b. Non <i>Security</i> Limits: Testing and commissioning</p> <p>i. Generating Unit Limitations</p> <p>ii. Regulatory and Commercial Testing</p>	<p>The types of <i>over-riding constraints</i> that may be imposed in the MDOM include the following:</p> <p>a. <i>Security</i> Limits - The <i>System Operator</i> may impose <i>security</i> limits to override the <i>market offers</i> and address possible threats in <i>system security</i>.</p> <p>i. <i>Generation</i> <u>Capability</u> Limits – involves the minimum and maximum operating limits for <i>generation</i> <u>generating units and energy storage systems</u>. <i>Security</i> limits for <i>generating units and energy storage systems</i> shall also include scheduled <i>must-run units</i> in accordance with the selection criteria in section 17.2 of this Dispatch Protocol.</p> <p>ii. Branch Group Limits – involves the maximum flow that may pass through a certain group of <i>transmission lines</i></p> <p>iii. Transmission Limits – involves the maximum flow that may pass through a specific line or transformer or <i>HVDC</i></p> <p>iv. Other types as may be recommended by the <i>System Operator</i></p> <p>b. Non <i>Security</i> Limits: Testing and commissioning</p>	Revised Generation Limit to Capability Limit to cover ESS.				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			i. Generating Unit Limitations <u>of Generating Units and Energy Storage Systems</u> ii. Regulatory and Commercial Testing					
SYSTEM OPERATOR INPUT DATA AND REPORTS	7.6.3	<i>Over-riding constraints</i> in the scheduling and <i>dispatch</i> of <i>generating units</i> qualifying as <i>must-run units</i> designated under Section 7.6.2 and Section 17, shall be compensated based on the mechanism set forth in the Price Determination Methodology Manual. <i>Over-riding constraints</i> for the scheduling and <i>dispatch</i> of <i>generating units</i> undergoing Regulatory and Commercial testing process shall be considered as price takers in the WESM for <i>generation</i> traded in the <i>spot market</i> .	<i>Over-riding constraints</i> in the scheduling and <i>dispatch</i> of <i>generating units</i> <u>facilities</u> qualifying as <i>must-run units</i> designated under Section 7.6.2 and Section 17, shall be compensated based on the mechanism set forth in the Price Determination Methodology Manual. <i>Over-riding constraints</i> for the scheduling and <i>dispatch</i> of <i>generating units</i> <u>facilities</u> undergoing Regulatory and Commercial testing process shall be considered as price takers in the WESM for <i>generation</i> traded in the <i>spot market</i> .	Revised to standardize the use of the term facility.				
SYSTEM OPERATOR INPUT DATA AND REPORTS	7.6.4	<i>Generating units</i> undergoing regulatory and commercial tests shall submit to the <i>System Operator</i> the MW profile that details the MW target for each <i>dispatch interval</i> during its requested test period at least two (2) working days prior to the start of its testing.	<i>Generating units <u>and energy storage systems</u></i> undergoing regulatory and commercial tests shall submit to the <i>System Operator</i> the MW profile that details the MW target for each <i>dispatch interval</i> during its requested test period at least two (2) working days prior to the start of its testing.	Added ESS				
SYSTEM OPERATOR INPUT DATA AND REPORTS	7.7.5	The <i>System Operator</i> shall consider the following when preparing the <i>contingency</i> list: a. Loading limits of <i>transmission lines</i> , transformers and <i>generating units</i> ;	The <i>System Operator</i> shall consider the following when preparing the <i>contingency</i> list: a. Loading limits of <i>transmission lines</i> , transformers and <i>generating units</i> , <u>and energy storage systems</u> ;	Added ESS				

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		b. Single circuit <i>outage</i> (N-1) <i>contingency</i> including loss of Interconnection; c. Selective multiple circuit <i>outage</i> with corresponding System Integrity Protection Scheme (SIPS); and d. Other forms of <i>contingencies</i> submitted by the <i>System Operator</i> .	b. Single circuit <i>outage</i> (N-1) <i>contingency</i> including loss of Interconnection; c. Selective multiple circuit <i>outage</i> with corresponding System Integrity Protection Scheme (SIPS); and d. Other forms of <i>contingencies</i> submitted by the <i>System Operator</i> .					
Market Projections	8.6.4	The results of the <i>market projections</i> shall be published and notified to the <i>Trading Participants</i> through the <i>MPI</i> . <i>Trading Participants</i> shall be provided with the following information pertaining to their respective registered resource (i.e. <i>generating unit</i> or <i>load</i>): xxxx	The results of the <i>market projections</i> shall be published and notified to the <i>Trading Participants</i> through the <i>MPI</i> . <i>Trading Participants</i> shall be provided with the following information pertaining to their respective registered resource (i.e. <i>generating unit</i> , <u>energy storage system</u> , or <i>load</i>): xxxx	Added ESS				
Background on Real-Time Dispatch Scheduling	9.1.1	<i>WESM Rules</i> Clause 3.8 sets out the responsibilities of the <i>Market Operator</i> in the scheduling of <i>generation</i> and <i>load</i> in the <i>WESM</i> . Among other responsibilities, <i>WESM Rules</i> Clause 3.8.1 directs that prior to the commencement of each <i>dispatch interval</i> , the <i>Market Operator</i> shall use the <i>Market Dispatch Optimization Model</i> (MDOM) to determine the target <i>loading level</i> in MW for each <i>non-scheduled generating unit</i> , <i>must dispatch generating unit</i> , <i>priority dispatch generating unit</i> , <i>scheduled generating unit</i> or each <i>scheduled load</i> and for each <i>facility</i> for the end of the <i>dispatch interval</i> using the latest data	<i>WESM Rules</i> Clause 3.8 sets out the responsibilities of the <i>Market Operator</i> in the scheduling of <i>generation</i> and <i>load</i> in the <i>WESM</i> . Among other responsibilities, <i>WESM Rules</i> Clause 3.8.1 directs that prior to the commencement of each <i>dispatch interval</i> , the <i>Market Operator</i> shall use the <i>Market Dispatch Optimization Model</i> (MDOM) to determine the target <i>loading level</i> in MW for each <i>non-scheduled generating unit</i> , <i>must dispatch generating unit</i> , <i>priority dispatch generating unit</i> , <i>scheduled generating unit</i> , <u>battery energy storage system</u> , <u>pumped-storage hydropower</u> , <u>integrated generating plant and ESS</u> ,	Added all ESS types	- Consider all ESS Configurations as provided in General Comment 1 -Consider General Comment 2 re: PSH <u>unit</u>			

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		from the <i>System Operator</i> and the <i>Trading Participants</i> .	or each <i>scheduled load</i> and for each <i>facility</i> for the end of the <i>dispatch interval</i> using the latest data from the <i>System Operator</i> and the <i>Trading Participants</i> .					
Background on Real-Time Dispatch Scheduling	9.1.3	The <i>WESM Rules</i> defines <i>loading level</i> as the instantaneous level of output or consumption in MW of a <i>generating unit</i> or <i>load</i> . The <i>target loading level</i> of a <i>generator</i> or <i>load</i> is the <i>loading level</i> determined as an end-of-period target for that scheduled <i>generator</i> or <i>load</i> .	The <i>WESM Rules</i> defines <i>loading level</i> as the instantaneous level of output or consumption in MW of a <i>generating unit</i> , <u>energy storage system</u> , or <i>load</i> . The <i>target loading level</i> of a <i>generator</i> or <i>load</i> is the <i>loading level</i> determined as an end-of-period target for that scheduled <i>generator</i> or <i>load</i> .	Added ESS				
Responsibilities in Real-Time Dispatch Scheduling	9.3.3	<p><i>Trading Participants</i> shall be responsible for:</p> <p>a. Ensuring submission of <i>market offers</i> and <i>reserve offers</i> as set out in the <i>WESM Rules</i> and in accordance with the <i>WESM timetable</i> and the procedures and requirements set forth in this Dispatch Protocol.</p> <p>b. For <i>scheduled generating units</i> and <i>priority dispatch generating units</i> who are <i>dispatched</i>, generating in accordance with the <i>dispatch schedule</i> communicated and within the <i>Dispatch Conformance Standards</i> set forth in this <i>Market Manual</i>.</p> <p>xxxx</p>	<p><i>Trading Participants</i> shall be responsible for:</p> <p>a. Ensuring submission of <i>market offers</i> and <i>reserve offers</i> as set out in the <i>WESM Rules</i> and in accordance with the <i>WESM timetable</i> and the procedures and requirements set forth in this Dispatch Protocol.</p> <p>b. For <i>scheduled generating units</i>, <u>pumped-storage hydropower on generation mode, integrated generating plant and ESS on generation mode</u>, and <i>priority dispatch generating units</i> who are <i>dispatched</i>, generating in accordance with the <i>dispatch schedule</i> communicated and within the <i>Dispatch Conformance Standards</i> set forth in this <i>Market Manual</i>.</p>	Added all ESS types	<p>- Consider all ESS Configurations as provided in General Comment 1</p> <p>-Consider General Comment 2 re: PSH <u>unit</u></p>			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			xxxx					
Real-Time Dispatch Scheduling	9.7.2	The RTD results shall be published and notified to the <i>Trading Participants</i> through the Market Participant Interface (MPI). The <i>Trading Participants</i> shall be provided following information pertaining to their respective registered resource (i.e., <i>generating unit</i> or <i>load</i>): xxxx	The RTD results shall be published and notified to the <i>Trading Participants</i> through the Market Participant Interface (MPI). The <i>Trading Participants</i> shall be provided following information pertaining to their respective registered resource (i.e., <i>generating unit</i> , <u>energy storage system</u> , or <i>load</i>): xxxx	Added ESS				
Merit Order Table	10.1.1	The <i>WESM merit order table (WMOT)</i> is prepared as a guide for the <i>System Operator</i> in selecting <i>generating units</i> that can be re-dispatched in the course of the operations of the <i>power system</i> . The use of the <i>WMOT</i> by the <i>System Operator</i> shall be in accordance with the re-dispatch process described in the relevant Section of this Dispatch Protocol.	The <i>WESM merit order table (WMOT)</i> is prepared as a guide for the <i>System Operator</i> in selecting <i>generating units</i> <u>facilities</u> that can be re-dispatched in the course of the operations of the <i>power system</i> . The use of the <i>WMOT</i> by the <i>System Operator</i> shall be in accordance with the re-dispatch process described in the relevant Section of this Dispatch Protocol.	Revised to standardize the use of the term facility.				
Merit Order Table	10.1.3	The <i>System Operator</i> utilizes the <i>WMOT</i> of Offers Dispatched as a guide in determining which <i>generating units</i> may be constrained-off, whereas the <i>WMOT</i> of Offers Not Dispatched is a guide for determining which <i>generating units</i> may be constrained-on for a particular <i>dispatch interval</i> .	The <i>System Operator</i> utilizes the <i>WMOT</i> of Offers Dispatched as a guide in determining which <i>generating units</i> may be constrained-off, whereas the <i>WMOT</i> of Offers Not Dispatched is a guide for determining which <i>generating units</i> <u>facilities</u> may be constrained-on for a particular <i>dispatch interval</i> .	Revised to standardize the use of the term facility.				
Merit Order Table	10.2	This Section sets out the requirements and procedures for the preparation and use of the <i>WMOT</i> in the <i>dispatch</i> of <i>generating units</i> .	This Section sets out the requirements and procedures for the preparation and use of the <i>WMOT</i> in the <i>dispatch</i> of	Added ESS				

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			<i>generating units</i> <u>and energy storage systems</u> .					
Merit Order Table	10.3.2	Consistent with its obligations set out in this Dispatch Protocol in respect to the issuance of <i>dispatch instructions</i> , the <i>System Operator</i> shall be responsible for ensuring the application of the information provided in the <i>WMOT</i> in the real-time operation of the <i>grid</i> . The <i>System Operator</i> shall also be responsible for identifying the <i>generating units</i> that were issued <i>dispatch instructions</i> through the <i>dispatch instruction</i> report prepared in accordance with Sections 14.4.2 and 14.4.5.	Consistent with its obligations set out in this Dispatch Protocol in respect to the issuance of <i>dispatch instructions</i> , the <i>System Operator</i> shall be responsible for ensuring the application of the information provided in the <i>WMOT</i> in the real-time operation of the <i>grid</i> . The <i>System Operator</i> shall also be responsible for identifying the <i>generating units</i> <u>and energy storage systems</u> that were issued <i>dispatch instructions</i> through the <i>dispatch instruction</i> report prepared in accordance with Sections 14.4.2 and 14.4.5.	Added ESS				
Merit Order Table	10.4.2	The <i>WMOT</i> shall include the following: a. All <i>generating units</i> for which <i>offers</i> have been submitted for the relevant <i>dispatch interval</i> ; and b. All <i>generating units</i> which have been scheduled or included in the RTD schedule as a result of the imposition of <i>over-riding constraints</i> , with or without <i>offers</i> submitted for that <i>dispatch interval</i> .	The <i>WMOT</i> shall include the following: a. All <i>generating units</i> <u>and energy storage systems</u> for which <i>offers</i> have been submitted for the relevant <i>dispatch interval</i> ; and b. All <i>generating units</i> <u>and energy storage systems</u> which have been scheduled or included in the RTD schedule as a result of the imposition of <i>over-riding constraints</i> , with or without <i>offers</i> submitted for that <i>dispatch interval</i> .	Added ESS				
Merit Order Table	10.4.3	The following <i>generating units</i> shall be excluded in the <i>WMOT</i> : a. <i>Generating units</i> which are on <i>outage</i> as reflected in the <i>outage</i> schedule submitted by the <i>System Operator</i> , and	The following <i>generating units</i> <u>and energy storage systems</u> shall be excluded in the <i>WMOT</i> : a. <i>Generating units</i> <u>and energy storage systems</u> which are on <i>outage</i> as					

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		b. <i>Generating units</i> which are not available as reflected in the network configuration considered in the RTD <i>market run</i> .	reflected in the <i>outage</i> schedule submitted by the <i>System Operator</i> , and b. <i>Generating units <u>and energy storage systems</u></i> which are not available as reflected in the network configuration considered in the RTD <i>market run</i> .					
Merit Order Table	10.4.4	The <i>energy offers</i> for all <i>generating units</i> with <i>offers</i> will be segregated into two, namely, the: a. Offers Dispatched b. Offers Not dispatched	The <i>energy offers</i> for all <i>generating units <u>and energy storage systems</u></i> with <i>offers</i> will be segregated into two, namely, the: a. Offers Dispatched b. Offers Not dispatched	Added ESS				
Merit Order Table	10.4.5	The “Offers Dispatched” consists of the <i>energy offer</i> blocks, excluding <i>reserve schedules</i> , which have been scheduled in the RTD schedule for the <i>dispatch interval</i> . To the extent possible, the <i>dispatch schedule</i> of each <i>generating unit</i> will be split into corresponding <i>offer</i> blocks. The scheduled <i>offer</i> blocks will then be sorted and listed from the lowest-priced to the highest-priced scheduled <i>offer</i> block, with the lowest-priced scheduled <i>offer</i> block at the bottom of the list and the highest-priced at the top of the list. The <i>generating units</i> for which no <i>offers</i> are submitted but were scheduled are considered as price takers. Their respective MW schedules are included in this list and are placed at the bottom of the list with <i>must dispatch generating units</i> at the bottom and followed by <i>priority dispatch generating units</i> and	The “Offers Dispatched” consists of the <i>energy offer</i> blocks, excluding <i>reserve schedules</i> , which have been scheduled in the RTD schedule for the <i>dispatch interval</i> . To the extent possible, <u>only offer blocks that represent injection to the grid shall be considered. To add,</u> the <i>dispatch schedule</i> of each <i>generating unit</i> <i>facility</i> will be <u>further</u> split into corresponding <i>offer</i> blocks. The scheduled <i>offer</i> blocks will then be sorted and listed from the lowest-priced to the highest-priced scheduled <i>offer</i> block, with the lowest-priced scheduled <i>offer</i> block at the bottom of the list and the highest-priced at the top of the list. The <i>generating units</i> <i>facility</i> for which no <i>offers</i> are submitted but were scheduled <u>to inject power to the grid</u> are considered as price takers. Their respective MW schedules are included in this list and are placed at the bottom of	Specified that offer blocks that represent generation or injection to the grid from generating units and ESS shall be considered in MOT.				

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		<i>non-scheduled generating units</i> in that order.	the list with <i>must dispatch generating units</i> at the bottom, and followed by <i>priority dispatch generating units</i> , and then <i>non-scheduled generating units</i> in that order.					
Merit Order Table	10.4.6	The “Offers Not Dispatched” consists of the remaining <i>energy offers</i> of each available <i>generating unit</i> that are not scheduled or included in the RTD schedule for the <i>dispatch interval</i> . To the extent possible, the remaining <i>offers</i> will be sorted by <i>offer</i> blocks. The <i>offer</i> blocks not dispatched will then be sorted and listed from the lowest-priced to the highest-priced scheduled <i>offer</i> block, with the lowest-priced scheduled <i>offer</i> block at the bottom of the list and the highest-priced at the top of the list. Capacities that were not dispatched through their <i>energy offers</i> but have <i>reserve dispatch</i> targets shall be excluded from the list.	The “Offers Not Dispatched” consists of the remaining <i>energy offers</i> of each available <i>generating unit</i> facility that are not scheduled or included in the RTD schedule for <u>generation dispatch in</u> the <i>dispatch interval</i> . To the extent possible, <u>only offer blocks that represent injection to the grid shall be considered. To add</u> , the remaining <i>offers</i> will be sorted by <i>offer</i> blocks. The <i>offer</i> blocks not dispatched will then be sorted and listed from the lowest-priced to the highest-priced scheduled <i>offer</i> block, with the lowest-priced scheduled <i>offer</i> block at the bottom of the list and the highest-priced at the top of the list. Capacities that were not dispatched through their <i>energy offers</i> but have <i>reserve dispatch</i> targets shall be excluded from the list.	Specified that offer blocks that represent generation or injection to the grid from generating units and ESS shall be considered in MOT.				
Dispatch Implementation	11.2.2	The procedures set out in this Section are associated with the following procedures: a. Procedures for the <i>dispatch</i> of <i>generating units</i> which are scheduled to <i>start-up</i> or <i>shutdown</i> are set out in Section 13 of this Dispatch Protocol;	The procedures set out in this Section are associated with the following procedures: a. Procedures for the <i>dispatch</i> of <i>generating units</i> <u>and energy storage systems</u> which are scheduled to <i>start-up</i> or <i>shutdown</i> are set out in Section 13 of this Dispatch Protocol;	Added ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		b. Designation and <i>dispatch</i> of <i>must-run units</i> which are set out in Section 17 of this Dispatch Protocol; xxxx	b. Designation and <i>dispatch</i> of <i>must-run units</i> which are set out in Section 17 of this Dispatch Protocol; xxxx					
Dispatch Implementation	11.3.1	The <i>System Operator</i> , in coordination with the <i>Market Operator</i> , shall be responsible for the following: a. Monitoring the implementation of <i>dispatch</i> targets as determined by the <i>Market Operator</i> at the end of each <i>dispatch interval</i> ; b. Directly issuing <i>dispatch instructions</i> to <i>generating units</i> operating on AGC; c. Implementing the <i>WMOT</i> provided by the <i>Market Operator</i> ; xxxx	The <i>System Operator</i> , in coordination with the <i>Market Operator</i> , shall be responsible for the following: a. Monitoring the implementation of <i>dispatch</i> targets as determined by the <i>Market Operator</i> at the end of each <i>dispatch interval</i> ; b. Directly issuing <i>dispatch instructions</i> to <i>generating units</i> <u>and energy storage systems</u> operating on AGC; c. Implementing the <i>WMOT</i> provided by the <i>Market Operator</i> ; xxxx	Added ESS				
Dispatch Implementation	11.3.4	A Trading <i>Participant</i> that has been released with a Final Certificate of Approval to Connect but with pending issuance of the <i>Certificate of Compliance</i> from the <i>ERC</i> for its <i>generating units</i> shall likewise comply with <i>dispatch schedules</i> issued by the <i>Market Operator</i> , the <i>dispatch instructions</i> issued by the <i>System Operator</i> to their facilities operating on AGC mode, and the re-dispatch instructions issued to them by the <i>System Operator</i> , if any.	A Trading <i>Participant</i> that has been released with a Final Certificate of Approval to Connect but with pending issuance of the <i>Certificate of Compliance</i> from the <i>ERC</i> for its <i>generating units</i> <u>and energy storage systems</u> shall likewise comply with <i>dispatch schedules</i> issued by the <i>Market Operator</i> , the <i>dispatch instructions</i> issued by the <i>System Operator</i> to their facilities operating on AGC mode, and the re-dispatch instructions issued to them by the <i>System Operator</i> , if any.	Added ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision														
Dispatch Implementation	11.4.1	Except for <i>generating units</i> operating on AGC, <i>dispatch instructions</i> shall include the following: xxxx	Except for <i>generating units</i> <u>and energy storage systems</u> operating on AGC, <i>dispatch instructions</i> shall include the following: xxxx	Added ESS																		
Dispatch Implementation	11.4.2	For generating units operating on AGC, the following shall be observed: xxxx	For generating units <u>and energy storage systems</u> operating on AGC, the following shall be observed: xxxx	Added ESS																		
Dispatch Implementation	11.4.4 (a)	When the <i>grid frequency</i> reaches 59.7Hz or lower, the <i>Trading Participants</i> shall operate based on the following conditions: <table><tr><td>Condition</td><td>Status of Actual Dispatch</td><td>Expected Response</td></tr><tr><td rowspan="2">Frequency is 59.7 Hz or lower</td><td>If ramping down, or current actual loading is higher than <i>dispatch schedule</i></td><td><i>Generating unit</i> should stop ramping down and maintain current actual loading unless otherwise instructed by the <i>System Operator</i></td></tr><tr><td>If ramping up, or current</td><td><i>Generating unit</i> should continue to</td></tr></table>	Condition	Status of Actual Dispatch	Expected Response	Frequency is 59.7 Hz or lower	If ramping down, or current actual loading is higher than <i>dispatch schedule</i>	<i>Generating unit</i> should stop ramping down and maintain current actual loading unless otherwise instructed by the <i>System Operator</i>	If ramping up, or current	<i>Generating unit</i> should continue to	When the <i>grid frequency</i> reaches 59.7Hz or lower, the <i>Trading Participants</i> shall operate based on the following conditions: <table><tr><td>Condition</td><td>Status of Actual Dispatch</td><td>Expected Response</td></tr><tr><td>Frequency is 59.7 Hz or lower</td><td>If ramping down, or current actual loading is higher than <i>dispatch schedule</i></td><td><i>Generating unit</i> <u>or energy storage system</u> should stop ramping down and maintain current actual loading unless otherwise instructed by the</td></tr></table>	Condition	Status of Actual Dispatch	Expected Response	Frequency is 59.7 Hz or lower	If ramping down, or current actual loading is higher than <i>dispatch schedule</i>	<i>Generating unit</i> <u>or energy storage system</u> should stop ramping down and maintain current actual loading unless otherwise instructed by the	Added ESS	For clarification- For the case wherein the SoC of the ESS (esp. BESS) renders it incapable of holding/maintaining its current loading, how shall the SO/MO manage or tag that? Will that be tagged as a non-compliance? Questions also applicable to the case of over-frequency. In the sections on dispatch			
Condition	Status of Actual Dispatch	Expected Response																				
Frequency is 59.7 Hz or lower	If ramping down, or current actual loading is higher than <i>dispatch schedule</i>	<i>Generating unit</i> should stop ramping down and maintain current actual loading unless otherwise instructed by the <i>System Operator</i>																				
	If ramping up, or current	<i>Generating unit</i> should continue to																				
Condition	Status of Actual Dispatch	Expected Response																				
Frequency is 59.7 Hz or lower	If ramping down, or current actual loading is higher than <i>dispatch schedule</i>	<i>Generating unit</i> <u>or energy storage system</u> should stop ramping down and maintain current actual loading unless otherwise instructed by the																				

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Title	Section	Provision			Proposed Amendment			Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision												
			actual loading is lower than <i>dispatch schedule</i>	ramp up to its <i>dispatch schedule</i> unless otherwise instructed by the <i>System Operator</i>			<i>System Operator</i>		compliance criteria and on the detection of non-compliance and possible breach, are there provisions specific or related to the SoC level of the ESS and possible exemptions from a non-compliance tagging based on remaining SoC?															
						If ramping up, or current actual loading is lower than <i>dispatch schedule</i>	<i>Generating unit</i> or <u>energy storage system</u> should continue to ramp up to its <i>dispatch schedule</i> unless otherwise instructed by the <i>System Operator</i>																	
Dispatch Implementation	11.4.4 (b)	Once the <i>grid frequency</i> goes up to 60 Hz after coming off from a state in Section 11.4.4 (a), then the <i>Trading Participants</i> shall resume to dispatch its <i>generating units</i> to meet its <i>dispatch schedule</i> .			Once the <i>grid frequency</i> goes up to 60 Hz after coming off from a state in Section 11.4.4 (a), then the <i>Trading Participants</i> shall resume to dispatch its <i>generating units</i> and <u>energy storage systems</u> to meet its <i>dispatch schedule</i> .			Added ESS																
Dispatch Implementation	11.4.4 (c)	When the <i>grid frequency</i> reaches 60.3 Hz or higher, the <i>Trading Participants</i> shall operate based on the following conditions: <table><tr><td>Condition</td><td>Status of Actual Dispatch</td><td>Expected Response</td></tr><tr><td></td><td></td><td></td></tr></table>			Condition	Status of Actual Dispatch	Expected Response				When the <i>grid frequency</i> reaches 59.7Hz or lower, the <i>Trading Participants</i> shall operate based on the following conditions: <table><tr><td>Condition</td><td>Status of Actual Dispatch</td><td>Expected Response</td></tr><tr><td></td><td>If ramping down, or</td><td><i>Generating unit</i> or</td></tr></table>			Condition	Status of Actual Dispatch	Expected Response		If ramping down, or	<i>Generating unit</i> or	Added ESS	Correction	When the <i>grid frequency</i> reaches <u>60.3 Hz or higher</u>, 59.7Hz or lower the <i>Trading Participants</i> shall operate based on the		
Condition	Status of Actual Dispatch	Expected Response																						
Condition	Status of Actual Dispatch	Expected Response																						
	If ramping down, or	<i>Generating unit</i> or																						

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Title	Section	Provision			Proposed Amendment			Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		Frequency is 60.3 Hz or higher	If ramping down, or current actual loading is higher than <i>dispatch schedule</i>	<i>Generating unit</i> should continue to ramp down to its <i>dispatch schedule</i> unless otherwise instructed by the <i>System Operator</i>	Frequency is 60.3 Hz or higher	current actual loading is higher than <i>dispatch</i>	<u><i>energy storage system</i></u> should continue to <i>schedule</i> ramp down to its <i>dispatch schedule</i> unless otherwise instructed by the <i>System Operator</i>			following conditions: xx		
			If ramping up, or current actual loading is lower than <i>dispatch schedule</i>	<i>Generator</i> should stop ramping up and maintain current actual loading unless otherwise instructed by the <i>System Operator</i>		If ramping up, or current actual loading is lower than <i>dispatch schedule</i>	<i>Generator</i> <u><i>Generating unit or energy storage system</i></u> should stop ramping up and maintain current actual loading unless otherwise instructed by the <i>System Operator</i>					
Dispatch Implementation	11.4.4 (d)	Once the <i>grid frequency</i> comes down to 60 Hz after coming off from a state in Section 11.4.4 (c), then the <i>Trading</i>			Once the <i>grid frequency</i> comes down to 60 Hz after coming off from a state in Section 11.4.4 (c), then the <i>Trading</i>			Added ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<i>Participants</i> shall resume to dispatch its generating units to meet its <i>dispatch schedule</i> .	<i>Participants</i> shall resume to dispatch its generating units and <u>energy storage systems</u> to meet its <i>dispatch schedule</i> .					
Dispatch Implementation	11.6.2	In cases of the occurrence of system <i>emergencies</i> , a threat to <i>system security</i> , or an event of <i>force majeure</i> , of the nature described in Chapter 6 of the <i>WESM Rules</i> and in Section 16 of this Dispatch Protocol, the <i>System Operator</i> shall declare <i>market intervention</i> in accordance with said Chapter 6 of the <i>WESM Rules</i> and this Dispatch Protocol. While <i>market intervention</i> is in effect, the <i>System Operator</i> shall take control of the <i>dispatch</i> of <i>generating units</i> in accordance with the procedures set out specifically for <i>market intervention</i> . The <i>System Operator</i> shall notify the <i>Market Operator</i> of its actions.	In cases of the occurrence of system <i>emergencies</i> , a threat to <i>system security</i> , or an event of <i>force majeure</i> , of the nature described in Chapter 6 of the <i>WESM Rules</i> and in Section 16 of this Dispatch Protocol, the <i>System Operator</i> shall declare <i>market intervention</i> in accordance with said Chapter 6 of the <i>WESM Rules</i> and this Dispatch Protocol. While <i>market intervention</i> is in effect, the <i>System Operator</i> shall take control of the <i>dispatch</i> of <i>generating units</i> <u>and energy storage systems</u> in accordance with the procedures set out specifically for <i>market intervention</i> . The <i>System Operator</i> shall notify the <i>Market Operator</i> of its actions.	Added ESS				
Dispatch Implementation	11.6.3	Where the results of the <i>ex-ante</i> or <i>real-time dispatch market runs</i> reflect <i>constraint violation coefficients</i> (CVCs), the <i>System Operator</i> shall use all reasonable endeavors to <i>dispatch generating units</i> in accordance with the RTD schedules and the <i>WMOT</i> generated and communicated by the <i>Market Operator</i> for the relevant <i>dispatch interval</i> . The <i>System Operator</i> shall, however, issue the necessary re-dispatch instructions to address the condition that gave rise to the occurrence of the CVCs.	Where the results of the <i>ex-ante</i> or <i>real-time dispatch market runs</i> reflect <i>constraint violation coefficients</i> (CVCs), the <i>System Operator</i> shall use all reasonable endeavors to <i>dispatch generating units</i> <u>and energy storage systems</u> in accordance with the RTD schedules and the <i>WMOT</i> generated and communicated by the <i>Market Operator</i> for the relevant <i>dispatch interval</i> . The <i>System Operator</i> shall, however, issue the necessary re-dispatch instructions to address the condition that gave rise to the occurrence of the CVCs.	Added ESS				

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Dispatch Implementation	11.6.5	In an event where all available <i>reserves</i> have been exhausted to address a threat in <i>system security</i> covered under Section 11.6.2, the <i>System Operator</i> may designate <i>generating units</i> to operate on <i>must-run unit</i> and they shall be re-dispatched out-of-merit to ensure the reliability and <i>security</i> of the <i>grid</i> in accordance with the selection criteria provided in Section 17.2.	In an event where all available <i>reserves</i> have been exhausted to address a threat in <i>system security</i> covered under Section 11.6.2, the <i>System Operator</i> may designate <i>generating units</i> <u>and energy storage systems</u> to operate on <i>must-run unit</i> and they shall be re-dispatched out-of-merit to ensure the reliability and <i>security</i> of the <i>grid</i> in accordance with the selection criteria provided in Section 17.2.	Added ESS	There should be a cost recovery mechanism for the transmission charges when the ESS is utilized as MOT, MRU or under Market Intervention, similar to the additional compensation for conventional generators.			
Dispatch Implementation	11.7.1	The <i>System Operator</i> shall re-dispatch <i>generating units</i> using the <i>WMOT</i> in accordance with the following procedure: a. Instruct <i>generators</i> to ramp-up (or ramp-down) following the <i>WMOT</i> . b. Report to the <i>Market Operator</i> the list of <i>generating units</i> instructed to ramp-up and would be designated as <i>must-run units</i> .	The <i>System Operator</i> shall re-dispatch <i>generating units</i> <u>and energy storage systems</u> using the <i>WMOT</i> in accordance with the following procedure: a. Instruct <i>generators</i> <u>facilities</u> to ramp-up (or ramp-down) following the <i>WMOT</i> . b. Report to the <i>Market Operator</i> the list of <i>generating units</i> <u>facilities</u> instructed to ramp-up and would be designated as <i>must-run units</i> .	Revised to add ESS and to standardize the use of the term facility.				
Dispatch Implementation	11.7.2	The <i>System Operator</i> shall designate <i>generating units</i> to operate as <i>must-run units</i> and shall issue re-dispatch instructions in accordance with Section 17.3 of this Dispatch Protocol.	The <i>System Operator</i> shall designate <i>generating units</i> <u>and energy storage systems</u> to operate as <i>must-run units</i> and shall issue re-dispatch instructions in accordance with Section 17.3 of this Dispatch Protocol.	Added ESS				
Dispatch Implementation	11.7.3	The <i>System Operator</i> shall inform the <i>generating unit</i> that it shall be re-	The <i>System Operator</i> shall inform the <i>generating unit</i> <u>and energy storage</u>	Revised to add ESS and				

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		dispatched as either a <i>constrain-on generator</i> , <i>constrain-off generator</i> , or a <i>must-run unit</i> for the relevant <i>dispatch interval</i> . The re-dispatched target MW loading shall also be communicated to the <i>generating unit/plant</i> .	<u>system</u> that it shall be re-dispatched as either a <i>constrain-on generator facility</i> , <i>constrain-off generator facility</i> , or a <i>must-run unit</i> for the relevant <i>dispatch interval</i> . The re-dispatched target MW loading shall also be communicated to the <i>generating unit/plant facility</i> .	to standardize the use of the term facility.				
Dispatch Implementation	11.7.4	<i>Generators</i> whose generating plants received re-dispatch instruction shall immediately and strictly comply with the corresponding <i>dispatch instructions</i> of the <i>System Operator</i> .	Generators <u>Trading Participants</u> whose generating plants <u>generating units or energy storage systems</u> received re-dispatch instruction shall immediately and strictly comply with the corresponding <i>dispatch instructions</i> of the <i>System Operator</i> .	Revised for clarity to include ESS				
Dispatch Implementation	11.7.5	After complying with the re-dispatch instructions, <i>generators</i> shall immediately follow the <i>dispatch schedules</i> for the next <i>dispatch interval</i> .	After complying with the re-dispatch instructions, generators <u>generating units and energy storage systems</u> shall immediately follow the <i>dispatch schedules</i> for the next <i>dispatch interval</i> .	Revised for clarity to include ESS				
Background on Dispatch Compliance	12.1.1	A <i>Generation Company</i> is required to operate their <i>scheduled generating units</i> and/or <i>priority dispatch generating units</i> in accordance with the scheduling and <i>dispatch</i> procedures described in Chapter 3 of the <i>WESM Rules</i> . More specifically, <i>scheduled generating units</i> and <i>priority dispatch generating units</i> shall generate in accordance with the <i>dispatch schedules</i> communicated pursuant to <i>WESM Rules</i> Clause 3.8.17 and in accordance with the <i>dispatch conformance standards</i> specified in Clause 3.8.5. They are to follow such	A <i>Generation Company</i> <u>and Energy Storage System</u> is required to operate their <i>scheduled generating units</i> , <u>pumped-storage hydropower on generation mode, integrated generating plant and ESS on generation mode</u> , and/or <i>priority dispatch generating units</i> in accordance with the scheduling and <i>dispatch</i> procedures described in Chapter 3 of the <i>WESM Rules</i> . More specifically, <i>scheduled generating units</i> , <u>pumped-storage hydropower on generation mode, integrated generating plant and</u>	Added ESS and all its types				

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		schedules unless otherwise restricted or instructed by the <i>System Operator</i> .	<i>ESS on generation mode</i> , and <i>priority dispatch generating units</i> shall generate in accordance with the <i>dispatch schedules</i> communicated pursuant to <i>WESM Rules</i> Clause 3.8.17 and in accordance with the <i>dispatch conformance standards</i> specified in Clause 3.8.5. They are to follow such schedules unless otherwise restricted or instructed by the <i>System Operator</i> .					
Background on Dispatch Compliance	12.1.5	<i>Scheduled generating units, battery energy storage systems, pumped storage units, must dispatch generating units, and priority dispatch generating units</i> that have Final Certificate of Approval to Connect but with pending issuance of <i>Certificate of Compliance</i> from the ERC shall likewise operate in accordance with Sections 12.1.1 and 12.1.3, as applicable, and as prescribed in Chapter 3 of the <i>WESM Rules</i> .	<i>Scheduled generating units, battery energy storage systems, pumped storage units</i> <i>hydropower, integrated generating plant and ESS</i> , must <i>dispatch generating units</i> , and <i>priority dispatch generating units</i> that have Final Certificate of Approval to Connect but with pending issuance of <i>Certificate of Compliance</i> from the ERC shall likewise operate in accordance with Sections 12.1.1 and 12.1.3, as applicable, and as prescribed in Chapter 3 of the <i>WESM Rules</i> .	Revised PSU to PSH and added integrated generating plant and ESS.				
Scope and Purpose on Dispatch Compliance	12.2.1	This Section describes the <i>dispatch compliance obligations of Trading Participants</i> in the <i>WESM</i> , particularly in respect to compliance with <i>energy dispatch schedules of scheduled generating units, non-scheduled generating units, priority dispatch generating units</i> and <i>Must dispatch generating units</i> .	This Section describes the <i>dispatch compliance obligations of Trading Participants</i> in the <i>WESM</i> , particularly in respect to compliance with <i>energy dispatch schedules of scheduled generating units, pumped storage hydropower, integrated generating plant and ESS, non-scheduled generating units, priority dispatch</i>	Specified all ESS types				

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			<i>generating units and Must dispatch generating units.</i>					
Scope and Purpose on Dispatch Compliance	12.2.2	For <i>scheduled generating units</i> and <i>priority dispatch generating units</i> , this Section establishes the <i>dispatch conformance standards</i> and procedures for monitoring compliance that are required to be established and be set out in a <i>Market Manual</i> pursuant to <i>WESM Rules</i> Clause 3.8.5.	For <i>scheduled generating units</i> , <u>pumped storage hydropower, integrated generating plant and ESS</u> , and <i>priority dispatch generating units</i> , this Section establishes the <i>dispatch conformance standards</i> and procedures for monitoring compliance that are required to be established and be set out in a <i>Market Manual</i> pursuant to <i>WESM Rules</i> Clause 3.8.5.	Specified all ESS types				
Responsibilities on Dispatch Compliance	12.3.2	The <i>Market Operator</i> is responsible for: a. Coordinating with the <i>System Operator</i> for the periodic review of the <i>dispatch conformance standards</i> as well as of the procedures set out in this Section; and b. Providing a mechanism for monitoring and for notifying <i>Trading Participants</i> of possible breach by <i>scheduled generating units</i> and <i>priority dispatch generating units</i> with the <i>dispatch conformance standards</i> .	The <i>Market Operator</i> is responsible for: a. Coordinating with the <i>System Operator</i> for the periodic review of the <i>dispatch conformance standards</i> as well as of the procedures set out in this Section; and b. Providing a mechanism for monitoring and for notifying <i>Trading Participants</i> of possible breach by <i>scheduled generating units</i> , <u>pumped storage hydropower, integrated generating plant and ESS</u> , and <i>priority dispatch generating units</i> with the <i>dispatch conformance standards</i> .	Specified all ESS types8..				
Compliance with Dispatch Schedules and Instructions	12.4.1	Compliance by the <i>Scheduled Generating Units</i> and <i>Priority Dispatch Generating Units</i> . a. All <i>scheduled generating units</i> and <i>priority dispatch generating units</i> shall comply with their respective <i>dispatch schedules</i> . This obligation shall also apply to the <i>scheduled generating units</i>	Compliance by the <i>Scheduled Generating Units</i> and <i>Priority Dispatch Generating Units</i> . a. All <i>scheduled generating units</i> , <u>pumped storage hydropower, integrated generating plant and ESS</u> , and <i>priority dispatch generating units</i> shall comply with their respective	Specified all ESS types and focused on generation mode only of these ESS types.				

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		<p>and <i>priority dispatch generating units</i> with a Final Certificate of Approval to Connect but with pending issuance of the <i>Certificate of Compliance</i> from the ERC. In complying with their <i>dispatch schedules</i>, said <i>generating units</i> shall generate in accordance with the <i>dispatch conformance standards</i> prescribed in Section 12.5 of the Dispatch Protocol. In the case of a <i>priority dispatch generating unit</i>, compliance with the <i>dispatch conformance standards</i> shall also apply in cases where its <i>dispatch schedule</i> was restricted pursuant to <i>WESM Rules</i> Clauses 3.6.1.7 and 3.6.1.8 because of a potential <i>system security contingency</i>.</p> <p>b. If re-dispatch instructions or <i>emergency</i> directions were issued by the <i>System Operator</i> to a <i>scheduled generating unit</i> or <i>priority dispatch generating unit</i> under the circumstances described in Section 11 of this Dispatch Protocol, the <i>generating unit</i> re-dispatched or directed shall comply with the <i>dispatch instructions</i> of the <i>System Operator</i> in accordance with Section 12.4.4 of this Dispatch Protocol.</p> <p>xxxx</p>	<p><i>dispatch schedules</i> <u>when scheduled to inject power to the grid (i.e., generation mode)</u>. This obligation shall also apply to the <i>scheduled generating units</i>, <u>pumped storage hydropower, integrated generating plant and ESS</u>, and <i>priority dispatch generating units</i> with a Final Certificate of Approval to Connect but with pending issuance of the <i>Certificate of Compliance</i> from the ERC. In complying with their <i>dispatch schedules</i>, said <i>generating units</i> <u>facilities</u> shall generate in accordance with the <i>dispatch conformance standards</i> prescribed in Section 12.5 of the Dispatch Protocol. In the case of a <i>priority dispatch generating unit</i>, compliance with the <i>dispatch conformance standards</i> shall also apply in cases where its <i>dispatch schedule</i> was restricted pursuant to <i>WESM Rules</i> Clauses 3.6.1.7 and 3.6.1.8 because of a potential <i>system security contingency</i>.</p> <p>b. If re-dispatch instructions or <i>emergency</i> directions were issued by the <i>System Operator</i> to a <i>scheduled generating unit</i>, <u>pumped storage hydropower, integrated generating plant and ESS</u>, or <i>priority dispatch generating unit</i> under the circumstances described in Section 11 of this Dispatch Protocol, the <i>generating unit facility</i> re-dispatched or directed shall comply with</p>					

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			the <i>dispatch instructions</i> of the <i>System Operator</i> in accordance with Section 12.4.4 of this Dispatch Protocol. xxxx					
Dispatch Compliance	12.4.4	xxxx a. All <i>generating units</i> that were re-dispatched or were otherwise given <i>dispatch instructions</i> by the <i>System Operator</i> that differ from their respective <i>dispatch schedules</i> shall use reasonable endeavors to comply with said re-dispatch instructions. xxxx	xxxx a. All <i>generating units</i> <u>and energy storage systems</u> that were re-dispatched or were otherwise given <i>dispatch instructions</i> by the <i>System Operator</i> that differ from their respective <i>dispatch schedules</i> shall use reasonable endeavors to comply with said re-dispatch instructions. xxxx	Added ESS				
Dispatch Compliance Criteria	12.5.1	Dispatch Compliance Criteria a. Compliance by a <i>generating unit</i> with its <i>dispatch schedule</i> is determined based on the extent of the dispatch deviation incurred by the dispatched <i>generating unit</i> in relation to the dispatch threshold and is measured over a prescribed period or number of intervals. b. All <i>scheduled</i> and <i>priority dispatch generating units</i> shall not deviate beyond the upper and lower dispatch thresholds of +1.5% or -3% of the <i>dispatch schedule</i> or +/-1MW, whichever is higher, as follows:	Dispatch Compliance Criteria a. Compliance by a <i>generating unit</i> <u>or energy storage system</u> with its <i>dispatch schedule</i> is determined based on the extent of the dispatch deviation incurred by the dispatched <i>generating unit</i> <u>or energy storage system</u> in relation to the dispatch threshold and is measured over a prescribed period or number of intervals. b. All <i>scheduled</i> <u>generating units, pumped storage hydropower, integrated generating plant and ESS,</u> and <i>priority dispatch generating units</i> shall not deviate beyond the upper and	Added ESS and all its types				

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		<p>c. Reaction Period. If a <i>generating unit</i> incurs a dispatch deviation beyond either the upper and lower dispatch thresholds at any <i>dispatch interval</i>, the <i>Trading Participant</i> shall take action and implement measures in order for that <i>generating unit</i> to <i>dispatch</i> within the upper and lower dispatch thresholds over four (4) <i>dispatch intervals</i>.</p> <p>d. If the <i>generating unit</i> is able to comply only on the <i>dispatch interval</i> immediately after the reaction period, it must additionally sustain compliance for no less than three (3) consecutive <i>dispatch intervals</i>.</p>	<p>lower dispatch thresholds of +1.5% or - 3% of the <i>dispatch schedule</i> or +/-1MW, whichever is higher, as follows:</p> <p>c. Reaction Period. If a <i>generating unit</i> <u>or energy storage system</u> incurs a dispatch deviation beyond either the upper and lower dispatch thresholds at any <i>dispatch interval</i>, the <i>Trading Participant</i> shall take action and implement measures in order for that <i>generating unit</i> <u>or energy storage system</u> to <i>dispatch</i> within the upper and lower dispatch thresholds over four (4) <i>dispatch intervals</i>.</p> <p>d. If the <i>generating unit</i> <u>or energy storage system</u> is able to comply only on the <i>dispatch interval</i> immediately after the reaction period, it must additionally sustain compliance for no less than three (3) consecutive <i>dispatch intervals</i>.</p>					
Dispatch Compliance Criteria	12.5.2	<p>Detection of Non-Compliance and Possible Breach</p> <p>a. <i>Scheduled generating units</i> and <i>priority dispatch generating units</i> shall be flagged for non-compliance with <i>dispatch schedules</i> and for possible breach of the <i>dispatch conformance standards</i>.</p> <p>b. Non-Compliance with Dispatch Schedules. If the <i>dispatch</i> deviation incurred by a <i>generating unit</i> is beyond</p>	<p>Detection of Non-Compliance and Possible Breach</p> <p>a. <i>Scheduled generating units</i>, <u>pumped storage hydropower, integrated generating plant and ESS</u>, and <i>priority dispatch generating units</i> shall be flagged for non-compliance with <i>dispatch schedules</i> and for possible breach of the <i>dispatch conformance standards</i>.</p> <p>b. Non-Compliance with Dispatch Schedules. If the <i>dispatch</i> deviation</p>	Specified all ESS types				

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		<p>the upper and lower dispatch thresholds for a particular <i>dispatch interval</i>, that <i>generating unit</i> shall be flagged as non-compliant with its <i>dispatch schedule</i> for said <i>dispatch interval</i>.</p> <p>xxxx</p> <p>d. If the unit becomes compliant within the reaction period, the non-compliance count will be stopped or reset to zero.</p> <p>e. If the unit becomes compliant after the reaction period, counting of non-compliance shall be stalled and the non-compliance count shall thus not be incremented. Counting of non-compliance will continue and the non-compliance count will again be incremented when the generating unit is flagged as non-compliant in the succeeding interval. In this case, the non-compliance count shall only be stopped and be reset to zero if the generating unit is able to sustain <i>dispatch</i> compliance or is not flagged as non-compliant pursuant to Section 12.5.2 (b) for at least three (3) consecutive <i>dispatch intervals</i>.</p> <p>f. Possible Breach. The <i>generating unit</i> shall be flagged for possible breach of the <i>dispatch conformance standards</i> if the non-compliance count for a</p>	<p>incurred by a <i>generating unit</i> <u>or energy storage system</u> is beyond the upper and lower dispatch thresholds for a particular <i>dispatch interval</i>, that <i>generating unit</i> <u>or energy storage system</u> shall be flagged as non-compliant with its <i>dispatch schedule</i> for said <i>dispatch interval</i>.</p> <p>xxxx</p> <p>d. If the unit <u>generating unit or energy storage system</u> becomes compliant within the reaction period, the non-compliance count will be stopped or reset to zero.</p> <p>e. If the unit <u>generating unit or energy storage system</u> becomes compliant after the reaction period, counting of non-compliance shall be stalled and the non-compliance count shall thus not be incremented. Counting of non-compliance will continue and the non-compliance count will again be incremented when the generating unit is flagged as non-compliant in the succeeding interval. In this case, the non-compliance count shall only be stopped and be reset to zero if the generating unit is able to sustain <i>dispatch</i> compliance or is not flagged as non-compliant pursuant to Section 12.5.2 (b) for at least three (3) consecutive <i>dispatch intervals</i>.</p>					

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		<p><i>generating unit</i> exceeds four (4) intervals for deviations beyond the error threshold. In such cases, further assessment shall be carried out for the purpose of establishing, among other circumstances, whether or not the non-compliance is attributed to the following:</p> <p>xxxx</p>	<p>f. Possible Breach. The <i>generating unit</i> or <u>energy storage system</u> shall be flagged for possible breach of the <i>dispatch conformance standards</i> if the non-compliance count for a <i>generating unit</i> <u>or energy storage system</u> exceeds four (4) intervals for deviations beyond the error threshold. In such cases, further assessment shall be carried out for the purpose of establishing, among other circumstances, whether or not the non-compliance is attributed to the following:</p> <p>xxxx</p>					
Dispatch Compliance Reporting	12.6.2	<p><i>Trading Participants</i> shall submit to the <i>Market Operator</i> a daily non-conformance report that shall state, among other things, the reasons for non-compliance by their <i>generating units</i> for all instances when it is flagged for possible breach. The daily report shall cover flagged possible breach occurring within a <i>trading day</i> and shall be submitted within three (3) <i>working days</i> or within such other periods as may be notified to the <i>Trading Participants</i> from time to time. The reports so submitted shall be made available for market surveillance, compliance monitoring and enforcement, and market audit purposes.</p>	<p><i>Trading Participants</i> shall submit to the <i>Market Operator</i> a daily non-conformance report that shall state, among other things, the reasons for non-compliance by their <i>generating units</i> <u>and energy storage systems</u> for all instances when it is flagged for possible breach. The daily report shall cover flagged possible breach occurring within a <i>trading day</i> and shall be submitted within three (3) <i>working days</i> or within such other periods as may be notified to the <i>Trading Participants</i> from time to time. The reports so submitted shall be made available for market surveillance, compliance monitoring and enforcement, and market audit purposes.</p>	Added ESS				

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Start-up and Shutdown of Facilities	Section Title	START-UP AND SHUTDOWN OF GENERATING UNITS	START-UP AND SHUTDOWN OF GENERATING UNITS <u>FACILITIES</u>	Standardized to use term facility.				
Start-up and Shutdown of Facilities	13.1	This Section sets out the principles and procedures for the <i>start-up</i> and <i>shutdown</i> of <i>generating units</i> included in the scheduling and <i>dispatch</i> processes in the <i>WESM</i> . These are set out in order to minimize disruption in the scheduling and <i>dispatch</i> processes in the <i>WESM</i> that may be caused by the <i>start-up</i> or <i>shutdown</i> of <i>generating units</i> .	This Section sets out the principles and procedures for the <i>start-up</i> and <i>shutdown</i> of <i>generating units</i> <u>and energy storage systems</u> included in the scheduling and <i>dispatch</i> processes in the <i>WESM</i> . These are set out in order to minimize disruption in the scheduling and <i>dispatch</i> processes in the <i>WESM</i> that may be caused by the <i>start-up</i> or <i>shutdown</i> of <i>generating units</i> <u>and energy storage systems</u> .	Added ESS				
Start-up and Shutdown of Facilities	13.2.2	13.2.2 Consistent with its obligations pertaining to <i>real-time dispatch</i> scheduling and implementation, the <i>System Operator</i> shall ensure: a. Continuous and timely submission and updating of the <i>outage</i> schedules of <i>generating units</i> to the <i>Market Operator</i> ; b. Issue clearance to <i>Trading Participants</i> to carry out the <i>start-up</i> or <i>shutdown</i> of their <i>generating units</i> ; and c. Carry out the procedures set out in this Section.	13.2.2 Consistent with its obligations pertaining to <i>real-time dispatch</i> scheduling and implementation, the <i>System Operator</i> shall ensure: a. Continuous and timely submission and updating of the <i>outage</i> schedules of <i>generating units</i> <u>and energy storage systems</u> to the <i>Market Operator</i> ; b. Issue clearance to <i>Trading Participants</i> to carry out the <i>start-up</i> or <i>shutdown</i> of their <i>generating units</i> <u>and energy storage systems</u> ; and c. Carry out the procedures set out in this Section.	Added ESS				
Start-up and Shutdown of Facilities	13.2.3	The <i>Trading Participants</i> shall ensure their compliance with the procedures set out in this Section, and, among other responsibilities, shall ensure:	The <i>Trading Participants</i> shall ensure their compliance with the procedures set out in this Section, and, among other responsibilities, shall ensure:	Added ESS				

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		a. Timely submission of the notices and information required of them every time they intend to <i>start-up</i> or shut down their <i>generating units</i> ; b. Timely submission or cancellation of their <i>energy</i> and operating <i>reserve offers</i> consistent with the <i>WESM timetable</i> that is consistent with their scheduled <i>start-up</i> or shut-down; c. Strict compliance with their <i>outage</i> and <i>dispatch schedules</i> ; and d. Clearance from the <i>System Operator</i> prior to the <i>start-up</i> or <i>shutdown</i> of their <i>generating unit</i> .	a. Timely submission of the notices and information required of them every time they intend to <i>start-up</i> or shut down their <i>generating units</i> <u>and energy storage systems</u> ; b. Timely submission or cancellation of their <i>energy</i> and operating <i>reserve offers</i> consistent with the <i>WESM timetable</i> that is consistent with their scheduled <i>start-up</i> or shut-down; c. Strict compliance with their <i>outage</i> and <i>dispatch schedules</i> ; and d. Clearance from the <i>System Operator</i> prior to the <i>start-up</i> or <i>shutdown</i> of their <i>generating unit</i> <u>or energy storage system</u> .					
Start-up and Shutdown of Facilities	13.3.1	A <i>Trading Participant</i> shall request for clearance from the <i>System Operator</i> to <i>start-up/shutdown</i> its <i>generating unit</i> before the <i>dispatch interval</i> in which the <i>start-up/shutdown</i> is scheduled.	A <i>Trading Participant</i> shall request for clearance from the <i>System Operator</i> to <i>start-up/shutdown</i> its <i>generating unit</i> <u>or energy storage system</u> before the <i>dispatch interval</i> in which the <i>start-up/shutdown</i> is scheduled.	Added ESS				
Start-up and Shutdown of Facilities	13.3.2	For planned <i>outages</i> , a <i>Trading Participant</i> shall request for clearance from the <i>System Operator</i> and submit the <i>shutdown</i> profile of the <i>generating unit</i> to the <i>System Operator</i> not later than seven (7) <i>trading days</i> before the <i>dispatch interval</i> in which the <i>shutdown</i> is scheduled.	For planned <i>outages</i> , a <i>Trading Participant</i> shall request for clearance from the <i>System Operator</i> and submit the <i>shutdown</i> profile of the <i>generating unit</i> <u>or energy storage system</u> to the <i>System Operator</i> not later than seven (7) <i>trading days</i> before the <i>dispatch interval</i> in which the <i>shutdown</i> is scheduled.	Added ESS				
Start-up and Shutdown of Facilities	13.3.4	The <i>dispatch</i> scheduling of the <i>generating unit</i> that will <i>start-up</i> or <i>shutdown</i> shall be managed through its	The <i>dispatch</i> scheduling of the <i>generating unit</i> <u>or energy storage system</u> that will <i>start-up</i> or <i>shutdown</i>	Added ESS				

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		<i>market offers</i> submitted within the <i>WESM timetable</i> . The <i>Trading Participant</i> shall submit <i>market offers</i> or <i>nominations</i> for the <i>dispatch interval</i> during which the unit is to <i>start-up</i> or <i>shutdown</i> and make adjustments to its <i>market offers</i> or <i>nominations</i> , as appropriate.	shall be managed through its <i>market offers</i> submitted within the <i>WESM timetable</i> . The <i>Trading Participant</i> shall submit <i>market offers</i> or <i>nominations</i> for the <i>dispatch interval</i> during which the unit is to <i>start-up</i> or <i>shutdown</i> and make adjustments to its <i>market offers</i> or <i>nominations</i> , as appropriate.					
Start-up and Shutdown of Facilities	13.3.5	Consistent with the provisions in the <i>WESM Manual</i> on the Market Network Model Development and Maintenance - Criteria and Procedure, the status of <i>generating units</i> shall be based on their registered availability in the <i>market network model</i> .	Consistent with the provisions in the <i>WESM Manual</i> on the Market Network Model Development and Maintenance - Criteria and Procedure, the status of <i>generating units</i> <u>or energy storage system</u> shall be based on their registered availability in the <i>market network model</i> .	Added ESS				
Start-up and Shutdown of Facilities	13.4	Start-up of a Generating Unit	Start-up of a Generating Unit <u>or Energy Storage System</u>	Added ESS				
Start-up and Shutdown of Facilities	13.4.1	A <i>generating unit</i> must have <i>market offers</i> or <i>nominations</i> prior to the execution of the <i>real-time dispatch</i> run consistent with the <i>WESM timetable</i> .	A <i>generating unit</i> <u>or energy storage system</u> must have <i>market offers</i> or <i>nominations</i> prior to the execution of the <i>real-time dispatch</i> run consistent with the <i>WESM timetable</i> .	Added ESS				
Start-up and Shutdown of Facilities	13.4.2	The <i>System Operator</i> shall update the <i>outage</i> schedule of <i>generators</i> to remove the <i>generating unit</i> cleared to <i>start-up</i> from the <i>outage</i> list. Submission shall be in accordance with the <i>WESM timetable</i> .	The <i>System Operator</i> shall update the <i>outage</i> schedule of <i>generators</i> <u>facilities</u> to remove the <i>generating unit</i> <u>or energy storage system</u> cleared to <i>start-up</i> from the <i>outage</i> list. Submission shall be in accordance with the <i>WESM timetable</i> .	Revised to add ESS and standardized the use of the term facility.				
Start-up and Shutdown of Facilities	13.4.4	Once synchronized to the <i>grid</i> and scheduled for <i>dispatch</i> , the <i>generating unit</i> shall ramp-up linearly to its adjusted	Once synchronized to the <i>grid</i> and scheduled for <i>dispatch</i> , the <i>generating unit</i> <u>or energy storage system</u> shall	Added ESS				

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		operating limit that was based on its <i>start-up</i> profile in the next <i>dispatch interval</i> .	ramp-up linearly to its adjusted operating limit that was based on its <i>start-up</i> profile in the next <i>dispatch interval</i> .					
Start-up and Shutdown of Facilities	13.5	Shutdown of a Generating Unit	Shutdown of a Generating Unit <u>or</u> <u>Energy Storage System</u>	Added ESS				
Start-up and Shutdown of Facilities	13.5.1	<i>Generating units</i> cleared and scheduled for <i>shutdown</i> shall be included in the approved <i>outage</i> schedule submitted by the <i>System Operator</i> to the <i>Market Operator</i> .	<i>Generating units</i> <u>and energy storage systems</u> cleared and scheduled for <i>shutdown</i> shall be included in the approved <i>outage</i> schedule submitted by the <i>System Operator</i> to the <i>Market Operator</i> .	Added ESS				
Start-up and Shutdown of Facilities	13.5.2	The <i>generating unit</i> shall ramp-down linearly while shutting down until it is finally disconnected from the <i>grid</i> .	The <i>generating unit</i> <u>or</u> <u>energy storage system</u> shall ramp-down linearly while shutting down until it is finally disconnected from the <i>grid</i> .	Added ESS				
Start-up and Shutdown of Facilities	13.5.4	Once the generating unit has completely shut down, the relevant <i>Trading Participant</i> shall cancel its daily <i>market offer</i> or <i>nomination</i> profile for the affected <i>trading day</i> .	Once the generating unit <u>or</u> <u>energy storage system</u> has completely shut down, the relevant <i>Trading Participant</i> shall cancel its daily <i>market offer</i> or <i>nomination</i> profile for the affected <i>trading day</i> .	Added ESS				
Post Dispatch Data and Operation Reports	14.4.2	Dispatch Instruction Report. On a weekly basis, the <i>System Operator</i> shall submit a report to the <i>Market Operator</i> containing their <i>dispatch instructions</i> that includes, but are not limited to, <i>generator</i> re-dispatch (e.g. constrain-on generation, constrain-off generation, must-run generation), MW output schedule during <i>market intervention or market suspension</i> , and, as necessary, commands via the <i>automatic generation</i>	Dispatch Instruction Report. On a weekly basis, the <i>System Operator</i> shall submit a report to the <i>Market Operator</i> containing their <i>dispatch instructions</i> that includes, but are not limited to, <i>generator</i> <u>facility</u> re-dispatch (e.g. constrain-on generation, constrain-off generation, must-run generation), MW output schedule during <i>market intervention or market suspension</i> , and, as necessary, commands via the <i>automatic generation</i>	Revised to add ESS and standardized the use of the term facility.				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p><i>control</i>. The Dispatch Instruction Report shall contain, among others, the following information:</p> <p>a. Date and Time of Incident</p> <p>xxxx</p> <p>Reason for Dispatch Instruction: • Utilized for <i>ancillary services</i></p> <ul style="list-style-type: none">• Testing Requirement• Re-dispatch of <i>constrain-on</i> and <i>constrain-off generating units</i>• Designation of <i>must-run units</i>• Limitation on <i>must dispatch generating units</i>• <i>Market Intervention</i> or <i>Market Suspension</i> <p>d. Short description of the issue being addressed</p> <p>xxxx</p>	<p><i>control</i>. The Dispatch Instruction Report shall contain, among others, the following information:</p> <p>a. Date and Time of Incident</p> <p>xxxx</p> <p>Reason for Dispatch Instruction: • Utilized for <i>ancillary services</i></p> <ul style="list-style-type: none">• Testing Requirement• Re-dispatch of <i>constrain-on</i> and <i>constrain-off generating units</i> <u>and energy storage systems</u>• Designation of <i>must-run units</i>• Limitation on <i>must dispatch generating units</i>• <i>Market Intervention</i> or <i>Market Suspension</i> <p>d. Short description of the issue being addressed</p> <p>xxxx</p>					
Post Dispatch Data and Operation Reports	14.4.3	Market intervention Report. Pursuant to <i>WESM Rules</i> Clause 6.6.2.2, the <i>System Operator</i> (for grid-related) and <i>Market Operator</i> (for market-related) shall submit a <i>market intervention</i> report, as soon as practicable, to the <i>Market Surveillance Committee, Market Operator, DOE</i> and <i>ERC</i> , after the resumption of the <i>spot</i>	Market intervention Report. Pursuant to <i>WESM Rules</i> Clause 6.6.2.2, the <i>System Operator</i> (for grid-related) and <i>Market Operator</i> (for market-related) shall submit a <i>market intervention</i> report, as soon as practicable, to the <i>Market Surveillance Committee, Market Operator, DOE</i> and <i>ERC</i> , after the resumption of the <i>spot</i>	Added ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		<p><i>market</i>. Said report shall include the details of the activities done during the duration of the <i>market intervention</i> that include as follows:</p> <p>xxxx</p> <p>d. the actual <i>dispatch</i> of all <i>generating units</i> per interval affected.</p>	<p><i>market</i>. Said report shall include the details of the activities done during the duration of the <i>market intervention</i> that include as follows:</p> <p>xxxx</p> <p>d. the actual <i>dispatch</i> of all <i>generating units</i> <u>and energy storage systems</u> per interval affected.</p>					
Post Dispatch Data and Operation Reports	14.4.5	Report on Must-run Units. In accordance with <i>WESM Rules</i> Clause 3.5.13.1, the <i>System Operator</i> shall submit information to the <i>Market Operator</i> identifying all the <i>generating units</i> designated as <i>must-run units</i> within the <i>trading day</i> , as well as information necessary for the proper settlement of such <i>generating units</i> . Such information shall be included in the Dispatch Instruction Report.	Report on Must-run Units. In accordance with <i>WESM Rules</i> Clause 3.5.13.1, the <i>System Operator</i> shall submit information to the <i>Market Operator</i> identifying all the <i>generating units</i> <u>and energy storage systems</u> designated as <i>must-run units</i> within the <i>trading day</i> , as well as information necessary for the proper settlement of such <i>generating units</i> <u>and energy storage systems</u> . Such information shall be included in the Dispatch Instruction Report.	Added ESS				
Procedures During Market Intervention or Suspension	16.6.2	Pursuant to <i>WESM Rules</i> Clauses 6.5.2.1 and 6.6.5.1, the actions that the <i>System Operator</i> may take shall include, but shall not be limited to, the following: a. Increase or decrease the <i>generation</i> or supply <i>capability</i> such as issuance of <i>emergency</i> instructions to all available but not committed <i>generating units</i> to <i>start-up</i> , <i>shutdown</i> , cancel <i>generating units</i> on testing or recall transmission equipment <i>outages</i> ;	Pursuant to <i>WESM Rules</i> Clauses 6.5.2.1 and 6.6.5.1, the actions that the <i>System Operator</i> may take shall include, but shall not be limited to, the following: a. Increase or decrease the <i>generation</i> or supply <i>capability</i> such as issuance of <i>emergency</i> instructions to all available but not committed <i>generating units</i> <u>and energy storage systems</u> to <i>start-up</i> , <i>shutdown</i> , cancel <i>generating units</i> on	Added ESS	There should be a cost recovery mechanism for the transmission charges when the ESS is utilized as MOT, MRU or under Market Intervention, similar to the additional			

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		xxxx	testing or recall transmission equipment outages; xxxx		compensation for conventional generators.			
Management of Must-Run Units	17.1.1	<i>WESM Rules</i> Clause 6.6.1 states that the <i>System Operator</i> shall develop and periodically update the <i>system security</i> and reliability guidelines in consultation with <i>WESM Participants</i> and the <i>Market Operator</i> . With this, <i>Must-run units (MRUs)</i> were introduced as <i>generating units</i> that are scheduled or <i>dispatched</i> in real-time to maintain the <i>security</i> and reliability of the <i>grid</i> .	<i>WESM Rules</i> Clause 6.6.1 states that the <i>System Operator</i> shall develop and periodically update the <i>system security</i> and reliability guidelines in consultation with <i>WESM Participants</i> and the <i>Market Operator</i> . With this, <i>Must-run units (MRUs)</i> were introduced as <i>generating units</i> and <u>energy storage systems</u> that are scheduled or <i>dispatched</i> in real-time to maintain the <i>security</i> and reliability of the <i>grid</i> .	Added ESS				
Management of Must-Run Units	17.1.2	<i>WESM Rules</i> Clause 3.5.13.1 permits the <i>System Operator</i> , in coordination with the <i>Market Operator</i> , to impose <i>constraints</i> on the power flow, <i>energy generation</i> of a specific facility in the <i>Grid</i> to address <i>system security</i> and reliability of the <i>Grid</i> . On the other hand, relaxation of <i>constraints</i> on power flows, <i>energy generation</i> and <i>reserves</i> may also be implemented if the <i>Market Operator</i> is unable to generate a feasible <i>dispatch schedule</i> . For this purpose, the <i>System Operator</i> , in consultation with the <i>Market Operator</i> , is directed to develop the criteria and procedures for <i>dispatch</i> of <i>generating units</i> that are required to run as a result of the imposition or relaxation of <i>constraints</i> .	<i>WESM Rules</i> Clause 3.5.13.1 permits the <i>System Operator</i> , in coordination with the <i>Market Operator</i> , to impose <i>constraints</i> on the power flow, <i>energy generation</i> of a specific facility in the <i>Grid</i> to address <i>system security</i> and reliability of the <i>Grid</i> . On the other hand, relaxation of <i>constraints</i> on power flows, <i>energy generation</i> and <i>reserves</i> may also be implemented if the <i>Market Operator</i> is unable to generate a feasible <i>dispatch schedule</i> . For this purpose, the <i>System Operator</i> , in consultation with the <i>Market Operator</i> , is directed to develop the criteria and procedures for <i>dispatch</i> of <i>generating units</i> <u>and energy storage systems</u> that are required to run as a	Added ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			result of the imposition or relaxation of <i>constraints</i> .					
Management of Must-Run Units	17.1.3	The <i>Market Operator</i> shall provide a <i>merit order table</i> to the <i>System Operator</i> to serve as a guide in selecting <i>generating units</i> that can be re- <i>dispatched</i> in the course of the operations of the <i>power system</i> .	The <i>Market Operator</i> shall provide a <i>merit order table</i> to the <i>System Operator</i> to serve as a guide in selecting <i>generating units</i> <u>and energy storage systems</u> that can be re- <i>dispatched</i> in the course of the operations of the <i>power system</i> .	Added ESS				
Management of Must-Run Units	17.1.5	The <i>System Operator</i> utilizes the <i>merit order table's "Offers Dispatched"</i> as a guide in determining which <i>generating units</i> may be constrained-off, whereas the <i>merit order table's "Offers Not Dispatched"</i> is a guide for determining which <i>generating units</i> may be constrained-on for a particular <i>dispatch interval</i> .	The <i>System Operator</i> utilizes the <i>merit order table's "Offers Dispatched"</i> as a guide in determining which <i>generating units</i> <u>and energy storage systems</u> may be constrained-off, whereas the <i>merit order table's "Offers Not Dispatched"</i> is a guide for determining which <i>generating units</i> <u>and energy storage systems</u> may be constrained-on for a particular <i>dispatch interval</i> .	Added ESS				
Management of Must-Run Units	17.3.1	The <i>System Operator</i> shall select and designate the <i>generating units</i> that will run as an <i>MRU</i> for any period, in accordance with the criteria set forth in this section.	The <i>System Operator</i> shall select and designate the <i>generating units</i> <u>and energy storage systems</u> that will run as an <i>MRU</i> for any period, in accordance with the criteria set forth in this section.	Added ESS	There should be a cost recovery mechanism for the transmission charges when the ESS is utilized as MOT, MRU or under Market Intervention, similar to the additional compensation for conventional generators.			

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Title	Section	Provision		Proposed Amendment		Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Management of Must-Run Units	17.3.2	xxxx		xxxx		Added ESS				
		Table 9. Criteria and Considerations for Selection of <i>MRUs</i>		Table 9. Criteria and Considerations for Selection of <i>MRUs</i>						
		<i>MRU</i> Criteria	Considerations for Qualifications/Selection of <i>Must-run units</i>	<i>MRU</i> Criteria	Considerations for Qualifications/Selection of <i>Must-run units</i>					
		System Voltage Requirement refers to the required voltage control and reactive power which the <i>System Operator</i> may need to take into account for the reliability of the <i>Grid</i>	<ul style="list-style-type: none">• Generating unit/s run as <i>MRU</i> shall provide/absorb reactive power support in accordance with its corresponding reactive power capability curve to address under/over voltage problem.• Power plants with reactive power <i>generation/</i> absorption capability.• The use of <i>MRU</i> shall be based on the location where voltage problem exists	System Voltage Requirement refers to the required voltage control and reactive power which the <i>System Operator</i> may need to take into account for the reliability of the <i>Grid</i>	<ul style="list-style-type: none">• Generating unit/s <u>or <i>energy storage system/s</i></u> run as <i>MRU</i> shall provide/absorb reactive power support in accordance with its corresponding reactive power capability curve to address under/over voltage problem.• Power plants with reactive power <i>generation/</i> absorption capability.• The use of <i>MRU</i> shall be based on the location where voltage problem exists					
		Thermal Limits of Transmission Line and Power Equipment refers to the <i>dispatch</i> limitations of <i>generators</i> affected by the	<ul style="list-style-type: none">• Generating unit/s called to run as <i>MRU</i> to ensure the <i>security</i> and reliability of the <i>grid</i>.	Thermal Limits of Transmission Line and Power Equipment refers to the <i>dispatch</i> limitations of <i>generators</i>	<ul style="list-style-type: none">• Generating unit/s <u>or <i>energy storage system/s</i></u> called to run as <i>MRU</i> to ensure the <i>security</i> and reliability of the <i>grid</i>.					

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Title	Section	Provision		Proposed Amendment		Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		actual condition of the <i>transmission lines</i> and/or power equipment.		<u>facilities</u> affected by the actual condition of the <i>transmission lines</i> and/or power equipment.						
		Real-power Balancing and Frequency Control refers to the <i>energy</i> required to maintain the balance between supply and demand.	<ul style="list-style-type: none"> • The <i>System Operator</i> issues re-<i>dispatch instruction</i> to the Generating unit/s with fast ramp rate capability to constrain-on its output to immediately address threat in <i>security</i> and reliability of the <i>grid</i>. • During islanding operation or whenever a portion or part of the <i>grid</i> is isolated, the <i>System Operator</i> may require the Generator/s to come on-line to supply the corresponding demand of the localized portion of the isolated part of the <i>grid</i> 	Real-power Balancing and Frequency Control refers to the <i>energy</i> required to maintain the balance between supply and demand.	<ul style="list-style-type: none"> • The <i>System Operator</i> issues re-<i>dispatch instruction</i> to the Generating unit/s <u>or energy storage system/s</u> with fast ramp rate capability to constrain-on its output to immediately address threat in <i>security</i> and reliability of the <i>grid</i>. • During islanding operation or whenever a portion or part of the <i>grid</i> is isolated, the <i>System Operator</i> may require the Generator/s <u>facility</u> to come on-line to supply the corresponding demand of the localized portion of the isolated part of the <i>grid</i> 					
Management of Must-Run Units	17.4.1	The <i>Generating unit/s</i> identified and instructed by the <i>System Operator</i> as <i>MRUs</i> shall be based on the <i>security</i>		The <i>Generating unit/s</i> <u>or energy storage system/s</u> identified and instructed by the <i>System Operator</i> as <i>MRUs</i> shall be		Added ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
		assessment conducted by the <i>System Operator</i> .	based on the <i>security</i> assessment conducted by the <i>System Operator</i> .					
Management of Must-Run Units	17.4.2	<i>Generators</i> whose generating plants are instructed as <i>MRUs</i> must immediately and strictly comply with the corresponding <i>dispatch instructions</i> of the <i>System Operator</i>	<i>Generators</i> whose generating plants are <u>Generating units and energy storage systems</u> instructed as <i>MRUs</i> must immediately and strictly comply with the corresponding <i>dispatch instructions</i> of the <i>System Operator</i>	Revised for clarity to include ESS	There should be a cost recovery mechanism for the transmission charges when the ESS is utilized as MOT, MRU or under Market Intervention, similar to the additional compensation for conventional generators.			
Excess Generation	18.2.2	The <i>System Operator</i> shall be responsible for the following: xxxx c. Coordinate with the <i>Market Operator</i> for the imposition of over-riding <i>constraint</i> limit for certain generating unit/s that would be required not to be shut down. d. Implement Emergency Procedures and provide instructions to <i>generating units</i> not elected as must-run to <i>shutdown</i> , as maybe necessary, based on the <i>System security</i> and Reliability Guidelines and <i>WESM merit order table (WMOT)</i> provided by the <i>Market Operator</i> .	The <i>System Operator</i> shall be responsible for the following: xxxx c. Coordinate with the <i>Market Operator</i> for the imposition of over-riding <i>constraint</i> limit for certain generating unit/s <u>or energy storage system/s</u> that would be required not to be shut down. d. Implement Emergency Procedures and provide instructions to <i>generating units and energy storage systems</i> not elected as must-run to <i>shutdown</i> , as maybe necessary, based on the <i>System security</i> and Reliability Guidelines and	Added ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
			<i>WESM merit order table (WMOT)</i> provided by the <i>Market Operator</i> .					
Excess Generation	18.2.3	<p><i>Trading Participants</i> shall be responsible for the following:</p> <p>a. Review <i>generating units'</i> availability, maintenance schedule, <i>energy</i> and ramping limits in anticipation of the off-peak condition in the <i>power system</i>.</p> <p>xxxx</p>	<p><i>Trading Participants</i> shall be responsible for the following:</p> <p>a. Review <i>generating units'</i> <u>the</u> availability, maintenance schedule, <i>energy</i> and ramping limits <u>of generating units and energy storage systems</u> in anticipation of the off-peak condition in the <i>power system</i>.</p> <p>xxxx</p>	Revised for clarity to include ESS				
Excess Generation	18.3.3	The <i>System Operator</i> may submit <i>over-riding constraint</i> limits for <i>generating units</i> that are required to operate as <i>must-run units</i> during the period of the impending <i>excess generation</i> .	The <i>System Operator</i> may submit <i>over-riding constraint</i> limits for <i>generating <u>units and energy storage systems</u></i> that are required to operate as <i>must-run units</i> during the period of the impending <i>excess generation</i> .	Added ESS				
Excess Generation	18.3.4	<p><i>Trading Participants</i> may revise their <i>bids</i> and offers and shall exercise prudence on their <i>bids</i> and <i>offers</i> with regard to market integrity and <i>power system security</i> for intervals with impending <i>excess generation</i> periods by:</p> <p>a. <i>Customers</i> – Assessing their electricity consumption</p> <p>b. <i>Generators</i> – Assessing the capacity and mode of operation of their <i>generating units</i>.</p>	<p><i>Trading Participants</i> may revise their <i>bids</i> and offers and shall exercise prudence on their <i>bids</i> and <i>offers</i> with regard to market integrity and <i>power system security</i> for intervals with impending <i>excess generation</i> periods by:</p> <p>a. <i>Customers</i> – Assessing their electricity consumption</p> <p>b. <i>Generators</i> – Assessing the capacity and mode of operation of their <i>generating units</i>.</p> <p><u>c. <i>Energy Storage Systems</i> – Assess the capability and mode of operation of their <i>facilities</i>.</u></p>	Added ESS				

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Excess Generation	18.3.5	Should there be any indication of an <i>excess generation</i> four (4) hours prior to the affected hour, the <i>System Operator</i> shall prescribe the shut-down of generating units based on the <i>WESM excess generation merit-order table</i> provided by the <i>Market Operator</i> . The excess generation merit-order table shall be based on the average loss factor computed every six (6) months.	Should there be any indication of an <i>excess generation</i> four (4) hours prior to the affected hour, the <i>System Operator</i> shall prescribe the shut-down of generating units <u>and energy storage systems</u> based on the <i>WESM excess generation merit-order table</i> provided by the <i>Market Operator</i> . The excess generation merit-order table shall be based on the average loss factor computed every six (6) months.	Added ESS				
Procedures for Load Shedding	19.2.3	The <i>WESM Members</i> shall: xxxx c. Ensure that its <i>generating units</i> remain in synchronism for operating conditions as specified under the <i>Grid Code</i> . xxxx	The <i>WESM Members</i> shall: xxxx c. Ensure that its <i>generating <u>units and energy storage systems</u></i> remain in synchronism for operating conditions as specified under the <i>Grid Code</i> . xxxx	Added ESS				

E. WESM Manual on Load Forecasting Methodology Issue 5.0

WESM Manual on Load Forecasting Methodology Issue 5.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Proponent's Response	RCC Decision
Customer Forecast Submission	7.1.8	(new)	<u>Pumped-storage hydro shall submit Customer forecasts during pump-mode operations.</u>	Added responsibility to submit customer forecast during pump mode.				
Customer Forecast Submission	7.1.9	(new)	<u>If a separate load market resource is modelled to represent the projected MW charging of the battery facility within the integrated generating plant and ESS, then the responsible Trading Participant shall submit Customer forecasts for the load market resource in cases where it charges the battery from the transmission or distribution system.</u>	Added responsibility to submit customer forecast when charging from transmission or distribution system.				

Table 1. Reference for Registered Capacities of Energy Storage Systems

Type	Minimum Operating Limit	Maximum Operating Limit	Maximum Ramp Up Rate	Maximum Ramp Down Rate
Battery Energy Storage System	MW Charging Limit	MW Discharging Limit	Maximum ramp up capability of ESS	Maximum ramp down capability of ESS
Pumped-storage hydropower	MW Pumping Limit	MW Generation Capacity (Pmax)	Maximum ramp up capability of ESS	Maximum ramp down capability of ESS
Integrated Generating Plant and ESS	MW Charging Limit of BESS	MW Generation Capacity (Pmax)	Maximum ramp up capability of Generating Plant, plus the maximum ramp up capability of ESS	Maximum ramp down capability of Generating Plant, plus the maximum ramp down capability of ESS