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**Commenter's Information**

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Comments to the Proposed General Amendments to the WESM Rules and WESM Manual on Dispatch Protocol regarding Must-Offer Rule

WESM Rules (Posted: 05 March 2024   Effective: 13 February 2024)								
Title	Section	Provision	Proposed Amendment	Rationale	Comment	Proposed re-wording based on comment	Original Proponent's Response	RCC Decision
<p>Please write your comment here, if any:</p> <ol style="list-style-type: none"> <li>1. The rules provide the following guidelines:                             <ol style="list-style-type: none"> <li>a. The WESM adheres to self-commitment, where the Trading Participants manage their technical operations, unit commitment decisions, and other market risks in submitting their generation offers (Price Determination Methodology Section 1.2 (d)).</li> <li>b. The Generation Company shall submit standing market offer equivalent to the maximum stable load (Pmax) or available capacity, where the Generation Company shall take in consideration conditions such as outages, derating, <b>generator technical constraints</b> and weather disturbance that cause damage to the unit or that would limit the unit's capability to inject power to the grid (WESM Rules Clause 3.5.5.1 and Glossary-definition of Available Capacity).</li> <li>c. Generator technical constraint refers to plant equipment-related failure limitations encountered during start-up/shutdown procedure, effects of ambient temperature, and resource-related constraints that are not within the control of the Generation Company (Glossary-definition of Generator Technical Constraint).</li> </ol> </li> <li>2. In view of the foregoing, the proposal aims to include as generator technical constraint plant conditions, i.e. continued steam bypass, and flame loss, resulting from continuously operating at loads outside of the unit minimum operating level or being scheduled below the minimum stable load. We deem that the scheduling at minimum stable load should be effectively managed by offer submission process.</li> </ol>								
Submission of offers, bids, and data	3.5.11.5	<p>Market bids or market offers for any dispatch interval shall be revised by Trading Participants prior to gate closure in accordance with the <i>timetable</i> if these offers no longer represent a reasonable estimate of:</p> <p>(a) the status of the relevant <i>generating unit</i> (e.g., generator circuit breaker status, <i>outage</i>) or <i>scheduled load</i> for that <i>dispatch interval</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>demand bids</i> or <i>offers</i> likely to apply for the real-time <i>dispatch</i> optimization of that <i>dispatch interval</i>.</p>	<p>Market bids or market offers for any dispatch interval shall be revised by Trading Participants prior to gate closure in accordance with the <i>timetable</i> if these offers no longer represent a reasonable estimate of:</p> <p>(a) the status of the relevant <i>generating unit</i> (e.g., generator circuit breaker status, <i>outage</i>) or <i>scheduled load</i> for that <i>dispatch interval</i>; or</p> <p>(b) the capacity that can be attained taking into account the <b>generator technical constraints, and ramp rate</b> limitations of the <i>generating unit</i> during the relevant <i>dispatch interval</i>; or</p> <p>(c) the <i>demand bids</i> or <i>offers</i> likely to apply for the real-time</p>	<p>This proposal is applicable should the facility encounter technical limitations preventing the its unit to operate properly, or outside of its stable operating levels.</p> <p>We propose that the rules provide the Generation Facilities its right to make sound judgment to protect its facility from adverse impacts of generating below its stable operating conditions in the event that such situations become evident.</p>	<p>Generator technical constraints should already be considered in the submission of market bids or market offers.</p> <p>Scheduling at the minimum stable load is due to/and should be manage by the offer submission.</p> <p>The proposal to include the generator technical constraint in</p>	Propose to retain the original provision.		

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			<i>dispatch optimization of that dispatch interval;</i>		<p>item (b) might be presumptive since it refers to the capacity that can be attained considering limitations, i.e. ramp rate.</p> <p>Should the proposal be considered, what will be the parameters used in computing the capacity than can be attained taking into account the generator technical constraints?</p>			
Chapter 11 Glossary	Generator Technical Constraint	<p><b>Generator Technical Constraint.</b> Refers to plant equipment-related failure limitations encountered during start-up/shutdown procedure, effects of ambient temperature, and resource-related constraints due to the following:</p> <p>a) water elevation and diversion requirements for domestic or irrigation use for impounding hydro plants and water flow from rivers for run-of river hydro power plants;</p>	<p><b>Generator Technical Constraint.</b> Refers to plant equipment-related failure, limitations encountered during start-up/shutdown procedure, effects of ambient temperature, and resource-related constraints due to the following:</p> <p>a) water elevation and diversion requirements for domestic or irrigation use for impounding hydro plants and water flow from rivers for run-of river hydro power plants;</p>	<p>Provide and consider existing conditions which contributes to the limitations on the plants' ability to supply power to the grid.</p> <p>Continued steam bypass operation, and flame loss are results of operating the units at a level below its minimum stable operations, and extreme load fluctuations. These</p>	<p>The proposed amendment could not be considered as one of the causes of generator technical constraint because the causes, as outlined in the definition, are being identified as beyond the control of the</p>	Propose to retain the original provision.		

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		<p>b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants;</p> <p>c) unavailability of fuel resources that are not within the control of the <i>Generation Company</i> for biomass power plants; and</p> <p>d) steam flow limitations, station <i>load</i>, and electricity demand of its <i>energy</i> host, in the case of the co-generation systems.</p>	<p>b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants;</p> <p>c) unavailability of fuel resources that are not within the control of the <i>Generation Company</i> for biomass power plants; and</p> <p>d) steam flow limitations, <b><u>continued steam bypass, and flame loss as a result of continuously operating at loads outside of the unit minimum operating level resulting to instability of the unit,</u></b> station <i>load</i>, and electricity demand of its <i>energy</i> host, in the case of the co-generation systems.</p>	<p>can result damage on the units' equipment in the long run, accelerate degradation and increase likelihood of plant outages/deration.</p>	<p>Generation Company while the proposed amendment refers to the outcome of being scheduled below the minimum stable load.</p>			

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WESM Manual on Dispatch Protocol 20.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed re-wording based on comments	Original Proponent's Response	RCC Decision
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 optimization</i> 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</i> or <i>scheduled load</i>; or</p> <p>b. The capacity that can be attained taking into account the <b><u>generator technical constraints, and</u></b> <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 optimization</i> for the <i>dispatch interval</i>.</p>	To harmonize with the proposed amendments in the WESM Rules	Same comment on Clause 3.5.11.5 of WESM Rules	Propose to retain the original provision.		