

RDS-RRDSD-RegMD-RRA-2024-251  
4 September 2024

**ATTY. JESUSITO G. MORALLOS**

Chairperson, Rules Change Committee  
Philippine Electricity Market Corporation  
18/F Robinsons Equitable Tower  
ADB Avenue, Ortigas Center, Pasig City

**ATTENTION: MR. BIENVENIDO C. MENDOZA JR.**

RCC Secretariat and Chief Market Assessment Officer, Market Assessment Group

**SUBJECT: NGCP's GENERAL COMMENT ON GNPk's PROPOSED GENERAL AMENDMENTS  
RELATIVE TO THE MUST-OFFER RULE**

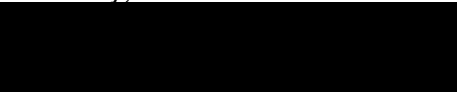
Dear **Chairperson Morallos**:

The National Grid Corporation of the Philippines (NGCP) would like to submit to the Philippine Electricity Market Corporation-Rules Change Committee the following general comment to GNPower Kauswagan Ltd. Co.'s (GNPK) ***Proposed Amendments to the Wholesale Electricity Spot Market (WESM) Rules and WESM Manual on Dispatch Protocol regarding Must-Offer Rule***:

NGCP would like to note that any exemption in the Rules would distort the market results (e.g., higher cost in case GNPK would opt not to run). Additionally, while the proposed amendments pertain to the submission of bids and offers of the Trading Participants in the WESM, over which the System Operator has no direct control, revisions of bids and offers due to generator technical constraints may impact the operational aspects and resource optimization of the System Operator. It is crucial to consider these potential effects to ensure efficient and reliable system operations.

Thank you and we hope for the Committee's consideration on this submission.

Sincerely,



**MA. CYNTHIA Y. MANRIQUE**

VP and Head, Revenue and Regulatory Affairs