

DISTRIBUTION UTILITIES' FORUM ON THE REM

Answers to Questions

Event Date: 07 May 2021

Issue Date: 17 May 2021

No	Topic	Question	Response (Draft)
1	Facility Registration	May I ask if there is a separate process for the certification of REC Meter? Thank you.	As long as its type is approved and with seal from ERC, no further certification is needed.
2	Facility Registration	Is it a valid action of the EC to hold certification for connection for those voluntary generators who apply for certificate of connection with the EC? Are the ECs allowed to compel the voluntary generators to have their renewable generation facilities be registered under the ECs?	The comment is well-noted. ERC representatives will consult their principals and response will be provided to participants once response is received from the Commission.
3	Facility Registration	How about the REC Meter for own-use? Are we still going to install a check meter?	As advised by ERC, check meter is needed to be installed and the cost shall be shared by the Distribution Utility and End-User following Annex A of the amended Net Metering Rules.

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4	Facility Registration	For clarification, how are we going to register the existing and New RE facility under Home Solar System and to qualify with the issuance of REC?	The DU who intends to register the facility just need to include the new RE facility in the Facility Registration Form of the Registrar and submit the connection agreement or consent from the consumer owner of this home solar system.
5	Facility Registration	When will be the start of the commercial operation of REM for Net Metering?	Based on the DOE Advisory released on 22 April 2021, the target commercial operations is on June 26, 2021. We will have the same time for commercial operations of the RE Market for all the facilities. But the provision of the MQ for net metering facilities and REC issuance will be based on the schedule to be followed by the RER and the REM Participants, which is targeted this September 2021.

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6	Facility Registration	There were amendments on the Net-metering Agreement particular on the expenses of bi-directional meters and its installation. Since this REC Meter is also a bi-directional meter. Is the QE will also shoulder the expenses for the REC Meter?	Per Annex A of Resolution No. 5 Series of 2020, Item No. 2: Cost of installation and location of the Renewable Energy Certificate (REC) Meter: This is to clarify that the cost of an REC meter its installation shall be shouldered by the DU; while the wiring cost from the facility to the REC meter shall be shouldered by the QE
7	Facility Registration	Clarification on the requirements for registering the Net Metering Facility, do we also need to submit the COC (certificate of compliance) coming from ERC, in addition to NMA (Provided by DU)?	For DUs with Net-Metered RE Generation Facilities, the Net Metering Agreement will suffice along with the Facility Registration Form.

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8	Facility Registration	If the validation form is submitted quarterly, can the meter reading of the REC meter of the Net Metering and Own-use customer be done only on a quarterly basis? Please note that most of the REC meters are inside customer premises, minimizing instance of meter reading is better.	The resolution that we require should be monthly. Maybe with the arrangement with the consumer, they can place the meter to an area wherein there is minimal intrusion by the meter reader for us to achieve the required resolution of data that has to be submitted.
9	Facility Registration	Can you facilitate a unified MOA specially for own-use customer to be used to all DU's for the attachment on REC generation registration.	PEMC will draft a pro-forma letter template for reference of the DUs.
10	Facility Registration	Can you please give us the form for us to input the Metered Data for Net Metering that will be submitted to RE registrar monthly. Thank you	The template for the meter data is available in the PREMS. On the Import data module, hover on the Import Meter Data, click the import meter data on the upper right of your screen, then click on the download csv template on the upper right portion.

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11	Facility Registration	<p>In connection with the reading of meter, how can the DU deal with REC meters having no display or irreparable error display upon reading, when this happens DU will have no way of getting the readings, we do an averaging process for the billing meters but will that be also applicable on REC meters?</p> <p>The "averaging process" is in accordance with DSOAR.</p>	<p>The suggestion is noted. We will look into this proposal. To aid us in the assessment of this suggestion, we would appreciate the DU's submission providing details of process and we propose that the procedures be contained in a manual or internal business process to implement the suggestion.</p>

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12	Facility Registration	To satisfy everybody, can you show us here the standard connection of said Meters?.	ERC to provide to PEMC the diagrams of the standard connection per customer type. The same will be provided to the DUs for reference.
13	Facility Registration	In the Connection agreement between SGF and EC do we need to required the SGF a permit from the LGU?	For our case, we only need the connection agreement for the facility registration. The ERC is issuing a certificate of compliance (COC) for the SGF. There is a form and checklist on the requirements to be complied by the end-users before issuance of COC. ERC to provide the forms to PEMC.

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14	Facility Registration	Can we ask copy of the forms as discussed by Sir Jayson Corpuz regarding SGF	Yes, we will provide the forms once received from the ERC.
15	Facility Registration	How to register our end-user with Solar PV on rooftop for their own-use and who is not registered as net-metering on EC franchise?	<p>Net Metering Agreement is required in the registration of net-metered facilities in the REM.</p> <p>Actual generation of all REM registered RE Facilities for RPS compliance will be reported by the RE Registrar to the DOE</p>

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16	Facility Registration for Voluntary Generator	Can we register net-metered RE facilities, generators for own-use and facilities under the GEOP?	<p>Yes. These facilities are considered as voluntary generators.</p> <p>Registration of VOLUNTARY GENERATORS should be through their host Distribution Utilities.</p> <p>Example of facility that can be registered by DU as Voluntary Generator:</p> <p>1. Grid-tied Solar PV rooftop owned by a cold storage facility consumer with a capacity of 246 kVA that serves as for their own-use</p>

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17	Facility Registration for Voluntary Generator	What are the requirements for the registration of Voluntary Generators (i.e. Net-metered RE Facilities, For own-use)	The requirements are as follows: 1. Facility Registration Form (hard and electronic copy) 2. For Net-metered facility - Net Metering Agreement (electronic copy) 3. For Non-WESM Embedded RE facility - Connection Agreement (electronic copy)
18	Facility Registration for Voluntary Generator	May we be provided with a template of the possible MOA with voluntary generators?	PEMC will draft a pro-forma letter template for reference of the DUs.
19	Facility Registration for Voluntary Generator	Can we add voluntary generators for net metering anytime a new facility registers or is it just one time application?	Yes. The information on new facilities shall be provided to the RE Registrar using the Facility Registration form, together with the electronic copy of the Net Metering Agreement (NMA) and/or other supporting document.

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20	Facility Registration for Voluntary Generator	Can we use the RE facility meter of our Qualified End-user as a REC meter?	Yes, provided that the meter is ERC-certified.
21	Facility Registration for Voluntary Generator	Is it a valid action of the EC to hold certification for connection for those voluntary generators who apply for certificate of connection with the EC? Are the ECs allowed to compel the voluntary generators to have their renewable generation facilities be registered under the ECs?	PEMC will consult the ERC's response to the questions raised.
22	Facility Registration for Voluntary Generator	Is Embedded RE Facility that was purchased before (PSALM) by the EC and presently under JVA is included in the voluntary generator?	Yes. DU can submit the consent from the other party of the JVA.
23	General Questions	When is the target commercial operation of REM?	Based on the DOE Advisory released on 22 April 2021, the target commercial operations is on June 26, 2021
24	Others	May we request another meeting before commercial operation regarding all clarification and updates, etc.	We will have another forum before the commercial operation of the REM. We will keep you posted once we have a schedule.

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25	Policy and Regulatory Concerns	Do you have a target date to release the cost recovery ruling of the ERC? Will there be public consultation for these rules?	Per ERC, this is targeted within the year. This will be subject to the rule making process, wherein proposed rules will be posted and there will be 15-days for stakeholders to comment and will conduct a virtual public consultation.
26	Policy and Regulatory Concerns	Is there a price cap when purchasing to the REM of REC and approved by ERC?	ERC may require DOE to file on this subject to final evaluation of ERC. The DOE endorsed to ERC the price cap amounting to Php 5,044/MWh. This will be subject to rule making process or rate case to be filed by DOE to be evaluated by ERC Legal Service.

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27	Policy Related Concerns -Cost Recovery	Will PEMC proceed with the implementation of the REM without the ERC ruling on the cost recovery?	<p>Cost recovery is crucial when the regulated entities need to buy RECs in the REM to comply to their RPS.</p> <p>Noting that RECs issued from generation of FIT-eligible facilities will be sufficient for the RPS compliance for the first few years of the REM Commercial Operations (COP), the REM can proceed with COP sans the ERC ruling on the cost recovery.</p>

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28	PREMS and SFTP Concerns	Who to ask for our credentials for the platform (PREMS) ?	<p>The RE Registrar staff sends individual email/text messages to authorized users for the PREMS.</p> <p>For the PREMS log-in credentials you may contact the following REM Staff: Marie Liezelle E. Macabenta – 0939 927 7404 Aldrin W. Reyes – 0949 452 7743</p> <p>You may send any your concerns on access credentials to the reregistrar@wesm.ph email.</p>
29	PREMS and SFTP Concerns	Who to ask for our credentials for the platform (SFTP) ?	For the SFTP, the default log-in credentials are as follows:
30	PREMS and SFTP Concerns	How to get a Digital Certificate (DC) to access the PREMS	Submit the accomplished Digital Certificate Service Request Form to the RE Registrar at reregistrar@wesm.ph

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No	Topic	Question	Response (Draft)
31	REC Issuance	How long will the validity of the REC be if we are going to bank it? is it still 3 years only?	The validity of a REC is three (3) years from the date it was issued regardless if it will be banked or not.
32	Regulatory Concerns	Should the available renewable energy in the market be not enough to supply the RE requirements of all distribution utilities, will the ECs and other mandatory participants charged for violation or non-compliance?	The RPS Rules have provisions for suspension of implementation if there is substantial shortfall of RECs in the market, to determined by the DOE.
33	Regulatory Concerns	If we procure our energy/secure REC's via REM, are we allowed to pass on the cost to member consumers?	This is subject to the cost recovery ruling of the ERC.

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No	Topic	Question	Response (Draft)
34	REM Process	Will the MQ for voluntary generators be in an hourly basis or aggregate for the billing period?	<p>This will be in monthly MWH.</p> <p>3.1.8.2 On-Grid Mandated Participants who are also the host Distribution Utilities for registered Net-Metered RE Generators and entities with RE Generation Facilities for own-use in their Franchise Areas or for the GEOP shall submit the monthly MWH Metered Quantity pertaining to that REM Quarter to the Registrar in respect of each Net Metered RE Generators with whom they have a Net-Metering Agreement, and entity with RE Generation Facilities for own-use within the period specified in Clause 3.1.3.7.</p>
35	REM Process	With regard to importing of Meter Data for net metering / self-generation facilities, can this be done thru the SFTP? Will this be the same as the importing of Meter Data thru the PREMS?	Host DU shall submit the meter data of its registered voluntary generator through the PREMS, using the prescribed template, which is also available/downloadable in the PREMS.

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No	Topic	Question	Response (Draft)
36	REM Process	Does this mean that the RECs from generation from the Non-FiT Eligible Facilities will now be given to their counterparties/customers and not the generators? Previously in your REM intro seminar you mentioned that the default owners of WESM Non-Fit are the generators.	<p>Load counterparty or RES with bilateral contract declaration from its non-FIT eligible RE facility will be the default REC owner.</p> <p>If there is no bilateral contract declaration, then generator owning the non-FIT eligible RE facility will be the REC owner.</p>

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No	Topic	Question	Response (Draft)
37	REM Process	How to validate the REC for EC RPS compliance from end-user with solar pv for own-use? (Such end-user has no net metering application and kwh meter use is not approved or calibrated by the EC)	Registration of such facility and provision of MQ data recorded from the meter installed by the host DU, are required so the DU can receive REC from said facility. To validate, the number of RECs received by the DU from that registered voluntary generator should be equal to the sum of the Quarterly MQ data submitted by the DU of each voluntary generator.
38	REM Process	Is the metering to be reported for net metering will be total output of the facility or the net? How about the other voluntary generator (Total for the month, hourly or every 5 minutes metering)?	If the REC Meter is available, then the total output of the facility can be reported. Otherwise, it will be the net output of the facility that will be reported. We only require the monthly format of the generation data.

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39	REM Process	What will be the BCQ data reported in the PREMS if the total MQ of the RE Generator is lower than its total BCQ? Will this be in an hourly interval or aggregate?	<p>The resolution of MQ and BCQ will be as follows:</p> <ol style="list-style-type: none"> 1. Hourly for partially eligible RE Facilities; or 2. Monthly for not partially eligible RE facilities <p>For cases when the MQ is lower than the total BCQ, the REC allocation for each load counterparty will be capped at the facilities' eligible MQ, and apportioned based on the BCQ.</p>
40	REM Process	Uploading of MQ and BCQ and Process familiarization	PEMC will conduct trainings on REM processes, including uploading of MQ by Host DU.
41	REM Process	Who will issue the RECs to the load counterparty under Power Supply Agreement? Is it the RE Registrar or the Generator Counterparty?	The RE Registrar, through the PREMS, will automatically issue the RECs to the load counterparty based on the bilateral contract declaration of its generator counterparty.

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42	REM Process	Can i be cleared. is the data needed to submit hourly or just total per month?	This will be in monthly MWH. 3.1.8.2 On-Grid Mandated Participants who are also the host Distribution Utilities for registered Net-
43	REM Process	How to access prems?	To access the PREMS, you should have submitted a DC Service Form in your REM Membership Application. In return, the RE Registrar will provide you a Digital Certificate and log-in credentials.
44	REM Process	The max 3 DCs are free? are there any charges more than the 3 DCs?	There is no charge for the Digital Certificate. However, issuance of DC is limited up to three (3) users only per participant.
45	REM Process	Do you have a TOP cases on MQ,BCQ and fit Allocation for PREMS for familiars the PREMS?	There will be a TOP cases for these but right now we are focusing on trainings for the participants.

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46	REM Registration	Can APEC, being only a Concessionaire of ALECO (the DU) register as a REM member? APEC is the entity that purchases power from the WESM and is the owner of the RECs.	Based on the list of Mandated Participants provided by the DOE, ALECO is the Mandated Participant. Power purchases from the WESM will not earn RECs.
47	REM Registration	Any confirmation or Certificate if an EC is already REM Registered?	Yes. The RE Registrar provides Notice of Approval and Certificate of REM Membership to the registered REM Member Company/Organization. The List of Registered REM Participants as of 30 April 2021 is available at the PEMC website (www.wesm.ph)

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48	REM Registration	Who are required to register in the REM?	1. MANDATED PARTICIPANTS: Distribution Utilities serving Captive Customers Enerzones Suppliers under the Retail Market Generators of Directly Connected Customers (DCC) 2. MANDATORY GENERATORS
49	REM Registration	What is the process to become a REM Member?	Membership in the REM is based on the eligibility criteria and membership categories under the REM Rules. Eligible entities shall submit the required registration forms and documents, as applicable.
50	REM Registration	Is there a penalty for late registration?	Late registration is not penalized. However, it may affect the RPS compliance of Mandated Participants.

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51	RPS Compliance	Based on the information provided by DOE in one of its webinars, it showed that nearly all DUs have REC shortfall starting 2024 and that there are no committed RE generation projects to address the shortfall. What is now the action plan of DOE/PEMC to address the shortfall?	<ol style="list-style-type: none"> 1. Green Energy Auction Program (GEAP) 2. Green Energy Option Program (GEOP) 3. Enhanced Net-metering
52	RPS Compliance	Hi, I'm from MORE Electric and Power Corporation, and we have concerns regarding RPS and REC issuance. As you all probably know, we are a newly established private DU in Iloilo City. When we took over the operation from the previous DU (PECO) last year February 2020, they did not surrender any data to us, thus we do not have any historical reference data for January 2018 to February 2020. Right now we only have settlement data starting March 2020 and FIT remittance sometime in April/May. Noting this data limitation, how are we going to calculate the allocated RECs for MORE?	We have a direction from the DOE wherein all benefits and obligations by PECO will be assumed by MORE. For the obligation, the net sales for 2018 will be complied to by MORE. The RPS requirements started in 2020 which is reckoned on the 2018 net electricity sales. Also, the RECs that are supposed to be assigned to PECO, that would cover RE certificates for contracts entered into before by PECO with an RE facility and even the FIT generation that is supposed to be assigned to PECO, will all go to MORE as the new franchise holder. With the RECs and contract that you have, all your 2020 RPS requirements can be complied to already.