



## RULES CHANGE COMMITTEE

### Proposed Urgent Amendments to the WESM Rules and WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units on Matters Relating to Enforcement Proceedings and Actions

Effective Date : 18 November 2022

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**WHEREAS**, pursuant to Department of Energy (DOE) Department Circular No. 2021-03-0004<sup>1</sup> (DC2021-03-0004), the Forecast Accuracy Standards (FAS) monitoring was transferred from the Market Operator to the Governance Arm under the Enforcement and Compliance Office (ECO);

**WHEREAS**, the same DOE DC provided a transition period and that the sanction for the non-compliance with FAS shall be implemented upon the commercial operation of enhanced WESM design and operations;

**WHEREAS**, in accordance with the WESM Rules Clause 3.5.5.9 and Section 3 of the WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units ("FAS Manual"), the ECO shall:

- evaluate annually the compliance of each must dispatch generating unit to the FAS; and
- report to the PEM Board and the DOE its evaluation on the annual compliance of each must dispatch generating unit to the FAS with respect to each must dispatch generating unit's projected outputs;

**WHEREAS**, on 10 November 2022, the Philippine Electricity Market Corporation (PEMC) submitted proposed urgent amendments to the WESM Rules and FAS Manual on matters relating to enforcement proceedings and actions;

**WHEREAS**, the proposed urgent amendments aim to:

- 1) Address the gap between the FAS Manual and interim procedures;
- 2) Ensure compliance with the requirements set forth in the DOE DC2022-05-0015;<sup>2</sup>
- 3) Define with more clarity the reference data for the calculation of the forecast percentage error and other terms used in the Manual;
- 4) Address some unique conditions, situations, or circumstances affecting the compliance of must dispatch generating units;
- 5) Give considerations or exemptions (for plants with limited participation); and
- 6) Add due process provisions;

**WHEREAS**, following the procedures for processing proposed urgent amendments specified in Section 7.2 of the WESM Manual on Procedures for Changes to the WESM and Retail Rules and Market Manuals ("Rules Change Manual"), the RCC convened a special meeting (203<sup>rd</sup> Meeting) on 14 November 2022 to determine if the proposal is urgent based on the criteria set forth in Section 3.1 of the Rules Change Manual, and if so, deliberate the proposal for endorsement to the PEM Board;

<sup>1</sup> DOE DC2021-03-0004: Adopting Further Amendments to the Wholesale Electricity Spot Market (WESM) Rules and Market Manual on Procedures for the Monitoring of Forecast Accuracy Standards For Must Dispatch Generating Units for the Implementation of Enhancements to WESM Design and Operations

<sup>2</sup> DOE DC 2022-05-0015: Supplementing Department Circular No. DC2021-06-0013 on the Framework Governing the Test and Commissioning of Generation Facilities for Ensuring Readiness to Deliver Energy to the Grid or Distribution Network

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**WHEREAS**, during the 203<sup>rd</sup> RCC (Special) meeting, PEMC presented the summary of the proposed urgent amendments:

WESM Rules	
Clause	Proposed Revision/Amendment
Clause 3.5.5.10	<ul style="list-style-type: none"> <li>Indicated that it is the “<b>annual</b>” results will be the basis for determining breach of the FAS rules and may be subject to penalty or sanctions</li> <li>Avoid confusion as to which report (monthly or annual) will be the reference.</li> <li>For consistency with the WESM Penalty Manual</li> </ul>
Clause 3.5.5.11	<ul style="list-style-type: none"> <li>Added <b>Compliance Committee (CC)</b> as one of the recipients of the report</li> <li>CC has oversight functions on compliance-related matters</li> <li>Current rule: It is just the PEM Board and the DOE</li> </ul>
Clause 7.2.10	<p>On Exemption from Sanction:</p> <p>The general rule: one-month exemption from WESM Membership            Proposal: to propose a more practicable provision for exemption (<b>pro-rated</b> and <b>exempted</b>)</p>
Ch. 11, Glossary	<ul style="list-style-type: none"> <li>Re-define Must Dispatch Generating Unit</li> <li>Use of more appropriate terms.</li> </ul>
Clause 3.5.5.12	<ul style="list-style-type: none"> <li>Remove inconsistent/redundant provision</li> <li>Remove overlapping functions</li> </ul>

FAS Manual	
Section	Proposed Revision/Amendment
Section 1.1.3 (Background)	<ul style="list-style-type: none"> <li>Include in the coverage the generating plants/facilities with issued FCATC per DOE DC2022-05-0015               <ul style="list-style-type: none"> <li>Include in the coverage the generating facilities with expansion unit</li> <li>Expansion Unit defined in Sec. 2.1.2 (Glossary) (New Provision)</li> </ul> </li> <li>Applicable parameters are set under Section 4.2.8 (New Provision)</li> </ul>
Section 2.1.2 (Glossary)	<ul style="list-style-type: none"> <li>Add new terms / terminologies frequently used in the Manual               <ul style="list-style-type: none"> <li>Expansion Unit</li> <li>Forecast Accuracy Standards Report</li> </ul> </li> <li>Initial Loading, re-defined</li> <li>Clerical Enhancements</li> </ul>
Section 3 (Responsibilities)	<ul style="list-style-type: none"> <li>Update the responsibilities of ECO based on current procedures: Monitoring, assessment, issuance of results, reporting (Current: reporting procedure only)</li> <li>Update the responsibilities of Generation Company (re: submission or replies and validation of claims of exclusions/data variance, etc.)</li> <li>Update the responsibilities of Market Operator (re: provision of data, validation / verification)</li> </ul>

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<b>FAS Manual</b>	
<b>Section</b>	<b>Proposed Revision/Amendment</b>
Sec. 4.1 (Standards)	<ul style="list-style-type: none"> <li>• Integrate due process requirements –               <ul style="list-style-type: none"> <li>○ Issuance of monthly FASRs</li> <li>○ Annual FASRs – as basis for imposition of sanctions, if there’s finding of breach</li> <li>○ Clarity in the context of “non-submission of projected outputs” that warrants imposition 100 FPE (error)</li> <li>○ New set of parameters for generation facilities with expansion unit</li> </ul> </li> </ul>
Section 4.3 (Other Basis for Recalculation)	<ul style="list-style-type: none"> <li>• Current: 5 Items for Exclusions only as basis for recalculation</li> <li>• Proposal: Add one more item, <i>i.e.</i>, “<b>data variance</b>” as basis for recalculation               <ul style="list-style-type: none"> <li>○ To address the concerns / problem on data inconsistency, non-updating, or variance.</li> <li>○ Due process</li> </ul> </li> </ul>
Section 4.4 (Monitoring, Reporting, and Review)	<ul style="list-style-type: none"> <li>• Current: Provision regarding issuance of monthly &amp; annual results to PEM Board &amp; DOE</li> <li>• Proposal: Include procedures for monitoring, issuance of results to Generation Companies, recalculation, and issuance of final results (monthly and annual) to Generation Companies, the PEM Board, CC, and DOE. Timeline for each procedure is also specified.</li> <li>• Final Annual Results and Imposition of Penalty: <b>on or before 31 March</b> of the following year</li> </ul>
Section 4.5 (Transition Period)	<ul style="list-style-type: none"> <li>• Simplified transition period: <b>6 months</b> from implementation of EWDO (based on consultation with DOE)</li> </ul>
Section 4.6 (Penalties and Sanctions)	<p><b>[NEW SUB-SECTION]</b></p> <ul style="list-style-type: none"> <li>• Guidelines for the application of penalty               <ul style="list-style-type: none"> <li>○ One Breach Count for MAPE and PERC95</li> <li>○ <b>Pro-rated Penalty</b> if plant is in operation for less than a year within the monitoring year</li> <li>○ <b>Exempted</b> if plant is in operation for 3 months or less prior to the end of monitoring year (e.g commenced operation in Oct / Nov / Dec)</li> </ul> </li> </ul>
Section 5.3 (Effectivity)	<p><b>[NEW]</b></p> <ul style="list-style-type: none"> <li>• Retroactive effect: from beginning of the year that the amendments are approved.</li> <li>• E.g., the amendment is approved in July 2023, it shall be applied from January to December 2023 billing period.</li> </ul> <p><i>Note: The final FAS results are <u>cumulative</u> in nature and are determined on <u>annual basis</u>. It would be impractical to have different sets of the governing rule in different months in one year. Thus, to always ensure uniformity and practicality in the application of the rules/provisions, the same should be applied for the whole year.</i></p>

**WHEREAS**, during the same meeting, the RCC:

- Agreed to delete the definition Must Dispatch Generating Unit in the FAS Manual, as this was already defined in the WESM Rules;

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- Approved to use the term 'business days' to specify the timelines in the proposal; and
- Adopted the retroactive clause under Section 5.3.2 of the WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units, as proposed, noting that the given retroactive effect shall be included in the PEM Board resolution and/or DOE issuance approving or promulgating the proposal;

**WHEREAS**, having considered all the comments raised, the RCC voted<sup>3</sup> in favor of (i) certifying the instant proposal as urgent, and (ii) approving the proposal for endorsement to PEM Board for approval;

**NOW THEREFORE**, we, the undersigned, on behalf of the sectors we represent, hereby resolve via electronic communication platforms, as follows:

**RESOLVED**, that RCC approved the Proposed Urgent Amendments to the WESM Rules and WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units on Matters Relating to Enforcement Proceedings and Actions attached as Annex A;

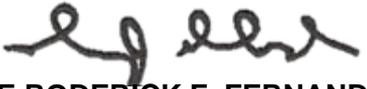
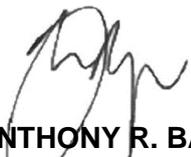
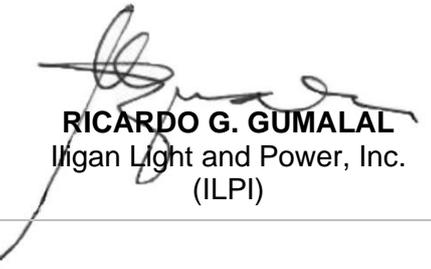
**RESOLVED FURTHER**, that the said Proposed Urgent Amendments to the WESM Rules and WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units on Matters Relating to Enforcement Proceedings and Actions, are hereby endorsed to the PEM Board for approval and for submission to DOE for information.

Done this 18<sup>th</sup> day of **November 2022**, *via* Microsoft Teams.

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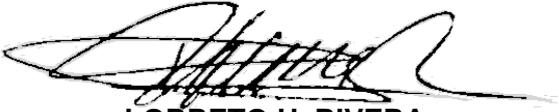
<sup>3</sup> Eight (8) Voted for urgent: (1) Independent, (4) Generation, (1) Distribution, Supply and Market Operator; One (1) Voted for not urgent: Distribution

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<p>Approved by: <b>THE RULES CHANGE COMMITTEE</b></p>	
<p>Independent Members:</p>	
 <b>JESUSITO G. MORALLOS</b> Chairperson	 <b>JOSE RODERICK F. FERNANDO</b>
<p><i>(vacant)</i></p>	<p><i>(vacant)</i></p>
<p>Generation Sector Members:</p>	
 <b>DIXIE ANTHONY R. BANZON</b> Masinloc Power Partners Co. Ltd. (MPPCL)	 <b>CHERRY A. JAVIER</b> Aboitiz Power Corp. (APC)
 <b>CARLITO C. CLAUDIO</b> Millennium Energy, Inc./ Pansia Energy, Inc. (MEI/PEI)	<p><i>(represented by his alternate during the deliberation and approval of the proposal)</i></p>  <b>MARK D. HABANA</b> Vivant Corporation - Philippines (Vivant)
<p>Distribution Sector Members:</p>	
 <b>RYAN S. MORALES</b> Manila Electric Company (MERALCO)	 <b>RICARDO G. GUMALAL</b> Iligan Light and Power, Inc. (ILPI)
 <b>VIRGILIO C. FORTICH, JR.</b> Cebu III Electric Cooperative, Inc. (CEBECO III)	 <b>NELSON M. DELA CRUZ</b> Nueva Ecija II Area 1 Electric Cooperative, Inc. (NEECO II – Area 1)



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<b>Supply Sector Member:</b>
 <b>LORRETO H. RIVERA</b> Team (Philippines) Energy Corporation (TPEC)
<b>Market Operator Member:</b>
 <b>ISIDRO E. CACHO, JR.</b> Independent Electricity Market Operator of the Philippines (IEMOP)
<b>System Operator Member:</b>
 <b>AMBROCIO R. ROSALES</b> National Grid Corporation of the Philippines (NGCP)



A. WESM Rules				
Title	Clause	Provision	Proposed Amendment	Rationale
Section 3.5.5 Generation Offers and Data	3.5.5.10	A <i>Trading Participant</i> who fails to meet the requisite forecast accuracy standards set out in accordance with Clause 3.5.5.8 in respect of <i>projected outputs</i> for a <i>must dispatch generating unit</i> submitted under Clause 3.5.5.5 may be liable for sanctions imposed under Clause 7.2.	A <i>Trading Participant</i> who fails to meet the requisite forecast accuracy standards set out in accordance with Clause 3.5.5.8 <b><u>based on an annual assessment and results</u></b> in respect of <del><i>projected outputs</i> for a <i>must dispatch generating unit</i> submitted under Clause 3.5.5.5</del> may be liable for sanctions imposed under Clause 7.2.	For clarity. ECO monitors monthly and annually. Only the failed <b>annual</b> rating shall be subject to sanctions.  Deleted part – redundant; it is already stated in the referred clause 3.5.5.8
Section 3.5.5 Generation Offers and Data	3.5.5.11	The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> the monthly and annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to its <i>projected outputs</i> .	The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> , <b><u>the Compliance Committee</u></b> , and the <i>DOE</i> the monthly and annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to its <i>projected outputs</i> .	To include CC to whom ECO reports as part of the Committee's oversight functions.
Section 3.5.5 Generation Offers and Data	3.5.5.12	The <i>Market Operator</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> the monthly and annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to its <i>projected outputs</i> .	<del>The <i>Market Operator</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> the monthly and annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to its <i>projected outputs</i>.</del>	Redundant provision. Under Clause 3.5.5.11, ECO shall perform this task.
Section 7.2 Enforcement	7.2.10	All <i>WESM Member</i> shall be exempted from an investigation and imposition of sanctions for probable <i>breach</i> that are committed –  (a) Within the first one (1) month of membership in the <i>WESM</i> by said <i>WESM Member</i> ; or  (b) Within the first one (1) month of the issuance of a new provision of the <i>WESM Rules</i> or a new <i>Market Manual</i> , or an amendment thereto, with respect to such new provisions, <i>Market Manual</i> or amendment, if non-compliance with the same amounts to a <i>breach</i> .  Notwithstanding, the <i>DOE</i> may issue a longer exemption period as it may deem necessary, to ensure the readiness of the <i>WESM Members</i> and in the implementation of a new policy or program that directly impacts the enforcement of the <i>WESM Rules</i> and its <i>Market Manuals</i> . For this purpose, the <i>DOE</i> shall issue an advisory to the <i>Governance Arm</i> providing such details of exemption as necessary.	<b><u>Unless otherwise provided in the relevant <i>Market Manual</i></u></b> , <del>All</del> <i>WESM Members</i> shall be exempted from an investigation and imposition of sanctions for probable <i>breach</i> that are committed –  x x x	To allow flexibility in setting a different exemption period when the <i>Market Manual</i> provides for a more practicable provision or consideration.  Note: Under the <i>WESM Rules</i> , one-month exemption is provided. In the proposed <i>FAS Manual</i> , an exemption is provided if the plant is in operation for 3 months or less prior to the end of the covered monitoring year. (See related proposal, Section 4.6.2 [b] of the <i>FAS Manual</i> )
Chapter 11 GLOSSARY		<b>Must Dispatch Generating Unit.</b> A <i>Generating Unit</i> or <i>Generating System</i> so designated by the <i>Market Operator</i> under Clause 2.3.1.5 and is provided <i>Must Dispatch</i> .	<b>Must Dispatch Generating Unit.</b> A <i>Generating Unit</i> or <i>Generating System</i> so designated by the <del><i>Market Operator</i></del> <b><u>certified by the DOE as must dispatch generating unit</u></b> under Clause 2.3.1.5 and is provided <del><i>Must Dispatch</i></del> <b><u>registered as such in the WESM by the Market Operator.</u></b>	Use of more appropriate terms.  Section 2.3.1.5 speaks of certification by the DOE rather than designation by the Market Operator.

B. WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units				
Title	Clause	Provision	Proposed Amendment	Rationale
SECTION 1 – INTRODUCTION  1.1. Background	1.1.3	[NEW]	<b><u>A Generation Company that has secured a Final Certificate of Approval to Connect for completing the conduct of test and commissioning but with pending issuance of Certificate of Compliance from the ERC for its must dispatch generating unit shall comply with the forecast accuracy standards in respect of its projected outputs.<sup>4</sup></u></b>	To reflect the provisions of DOE DC 2022-05-0015 as regards MDGUs' obligation to comply with forecast accuracy standards
SECTION 1 – INTRODUCTION  1.1. Background	1.1.4	[NEW]	<b><u>A Generation Company that has an expansion unit shall likewise comply with the forecast accuracy standards following the parameters set forth in Section 4.2.8 of this Manual.</u></b>	To consider the monitoring of a MDGU with expansion unit, i.e., facility with same plant substation and revenue meter; and to comply with the requirements under
SECTION 1 – INTRODUCTION  1.1. Background	1.1.3	<i>A Trading Participant who fails to meet the requisite forecast accuracy standards in respect of projected outputs for a must dispatch generating unit may be liable for sanctions imposed under Clause 7.2 of the WESM Rules.</i>	<b><u>A Trading Participant referred to in Sections 1.1.2, 1.1.3, and 1.1.4 hereof, which fails to meet the requisite forecast accuracy standards in respect of projected outputs for a must dispatch generating unit may be liable for sanctions imposed under Clause 7.2 of the WESM Rules and the WESM Penalty Manual.</u></b>	<ul style="list-style-type: none"> <li>Renumbered to <b>1.1.5</b> with modification</li> <li>For clarity. MDGUs with FCATC are already liable for sanctions in case of violations / breach of FAS.</li> </ul>
SECTION 1 – INTRODUCTION  1.1. Background	1.1.4	<i>Moreover, the Enforcement and Compliance Office is required by the WESM Rules report to the PEM Board and the DOE the annual compliance of each must dispatch generating unit to the forecast accuracy standards with respect to its projected outputs.</i>	<i>Moreover, the Enforcement and Compliance Office is required by the WESM Rules to report to the PEM Board, the Compliance Committee, and the DOE the annual compliance of each must dispatch generating unit to the forecast accuracy standards with respect to its projected outputs.</i>	<ul style="list-style-type: none"> <li>Renumbered to <b>1.1.6</b></li> <li>To include CC's oversight functions.</li> <li>There is also a corresponding change in WESM Rules Clause 3.5.5.11</li> </ul>
SECTION 2 DEFINITIONS, REFERENCES, AND INTERPRETATION  2.1 Definitions	2.1.2	<b><u>a) (new)</u></b>	<b><u>a) Expansion Unit. It shall refer to the expanded capacity of a must-dispatch generating unit or that built in phases and is designed to have the same plant substation and revenue meter as the existing capacity unit.</u></b>	To clarify the term used in the Manual.  To cover the expanded unit in the assessment of the FAS compliance of the MDGUs.
	2.1.2	<b><u>b) (new)</u></b>	<b><u>b) Forecast Accuracy Standards Report. Reports which are prepared and issued by the Enforcement and Compliance Office, as prescribed in Section 4.4 of this Manual.</u></b>	For reference to the type/s of report that ECO needs to prepare/issue in compliance with FAS Manual.
	2.1.2	<b><u>a) Forecast percentage error. Error (in %) of the projected output submitted by a must dispatch generating unit with respect to its maximum metered quantity over a billing period</u></b>	<del>a)</del> <b><u>c) Forecast percentage error. Error (in %) of the projected output submitted by a must dispatch generating unit with respect to its maximum metered quantity over a billing period</u></b>	Clerical correction. Renumbered to <b>c</b>

<sup>4</sup> Section 4.4.5 of the DOE DC2022-05-0015 "Supplementing Department Circular No. DC2021-06-0013 on the Framework Governing Test and Commissioning of Generation Facilities for Ensuring Readiness to Deliver Energy to the Grid or Distribution Network" Published in June 2022

B. WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units				
Title	Clause	Provision	Proposed Amendment	Rationale
		as dependable capacity and calculated in accordance with Section 4.2.3.	as dependable capacity and calculated in accordance with Section 4.2.3.	
	2.1.2	<b>b) Initial loading.</b> Loading (in MW) for the beginning of the <i>dispatch interval</i> assumed in, or estimated by, the dispatch optimization performed prior to the beginning of that <i>dispatch interval</i> .	<del>b) d) Initial loading.</del> Loading (in MW) for the beginning of the <i>dispatch interval</i> assumed in, or estimated by, the dispatch optimization performed prior to the beginning of that <i>dispatch interval</i> . <b><u>It shall refer to the previous dispatch schedule of the must dispatch generating unit. For example, the initial loading for 0105H shall be the dispatch schedule for 0100H.</u></b>	To reflect the nearest reference to the load for the beginning of the dispatch interval – which is more appropriate for MDGUs.  Note: the IL as originally defined is more appropriate for use by the conventional plants/ facilities.  Clerical correction. Renumbered to <b>d</b>
	2.1.2	<b>c) MAPE.</b> Abbreviation of <i>mean absolute percentage error</i> .	<del>e) e) MAPE.</del> x x x	Clerical correction. Renumbered to <b>e</b>
	2.1.2	<b>d) Mean absolute percentage error.</b> Mean of the <i>forecast percentage errors</i> of a <i>must dispatch generating unit</i> over a certain period calculated in accordance with Section 4.2.1.	<del>d) f) Mean absolute percentage error.</del> x x x	Clerical correction. Renumbered to <b>f</b>
	2.1.2	<b>e) Must dispatch generating unit.</b> A <i>generating unit</i> so designated by the <i>Market Operator</i> under clause 2.3.1.5 of the <i>WESM Rules</i> and is provided <i>Must Dispatch</i> . For brevity and when the context applies, this also refers to a <i>generation company</i> that operates a <i>must dispatch generating unit</i> in this <i>Market Manual</i> .	<del>e) Must dispatch generating unit.</del> A <i>generating unit</i> so designated by the <i>Market Operator</i> under clause 2.3.1.5 of the <i>WESM Rules</i> and is provided <i>Must Dispatch</i> . For brevity and when the context applies, this also refers to a <i>generation company</i> that operates a <i>must dispatch generating unit</i> in this <i>Market Manual</i> .	Deleted since this is already defined in WESM Rules
	2.1.2	<b>f) Perc95.</b> Abbreviation of <i>percentile 95 of the forecasting error</i> .	<del>f) g) Perc95.</del> Abbreviation of <i>p</i> <b>Percentile 95 of the forecasting error</b> .	Clerical correction. Renumbered to <b>g</b>
	2.1.2	<b>g) Percentile 95 of the forecasting error.</b> The value (in %) not exceeding 95% of the <i>forecast percentage errors</i> of the <i>must dispatch generating unit</i> during a certain period (see Section 6, Appendix A of this Manual).	<del>g) h) Percentile 95 of the forecasting error.</del> x x x	Clerical correction. Renumbered to <b>h</b>
	2.1.2	<b>h) Projected quantity.</b> Estimated <i>generation</i> of a <i>must dispatch generating unit</i> over a <i>dispatch interval</i> based on its submitted <i>projected output</i> assuming linear ramping calculated in accordance with Section 4.2.4.	<del>h) i) Projected quantity.</del> x x x	Clerical correction. Renumbered to <b>i</b>
	2.1.2	<b>i) Transition Period.</b> The period specified by the <i>DOE</i> wherein the provisions under Section 4.5 shall apply.	<del>i) j) Transition Period.</del> The period specified by the <i>DOE</i> wherein the provisions under 4.5 shall apply <b><u>referred to in Section 4.5 of this Manual.</u></b>	Provide for the specific duration of transition for clarity.  Section 4.5 – 6 months from implementation of the EWDO.
SECTION 3 – RESPONSIBILITIES  3.1 Enforcement and Compliance Office	3.1.1	The <i>Enforcement and Compliance Office</i> shall evaluate annually the compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards in this <i>Market Manual</i>	The <i>Enforcement and Compliance Office</i> shall <b><u>assess,</u></b> evaluate annually <del>and issue</del> the <b><u>cumulative results of MAPE and PERC95 to</u></b> compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards <del>in this Market Manual.</del> <b><u>on a monthly and annual basis in</u></b>	For consistency with Section 4.4.2 (renumbered to 4.4.5) of this Manual - requiring <u>monthly</u> reporting; and Section 4.4.1 (renumbered to 4.4.6) - requiring <u>annual</u> reporting

B. WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units				
Title	Clause	Provision	Proposed Amendment	Rationale
			<p><u>accordance with the procedures set forth in Section 4.4 hereof.</u></p> <p><u>The Enforcement and Compliance Office shall, for this purpose, establish a detailed process or procedure of compliance monitoring and assessment and prescribe a reply format or template that may be accomplished by the Generation Company as part of the monitoring process.</u></p>	2 <sup>nd</sup> paragraph – to integrate current process as would allow ECO to efficiently gather adequate data, information, or evidence from the trading participants.
	3.1.2	The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> its evaluation on the annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to each <i>must dispatch generating unit's</i> projected outputs	The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> , <u>the <i>Compliance Committee</i></u> , and the <i>DOE</i> its evaluation on the annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards <u>as set forth in Section 4.4.6 of this Manual</u> , with respect to each <i>must dispatch generating unit's</i> projected outputs	<p>Included Compliance Committee in view of its oversight functions.</p> <p>Reference to Section 4.4.6, as renumbered (previously Section 4.4.1)</p>
3.4 Generation Companies	<u>3.4.3</u>	[NEW]	<u>Generation companies shall coordinate with the Enforcement and Compliance Office for matters, data, or information necessary to establish, validate, and verify the incidents or circumstances referred to in Sections 4.3, and such other matters, data, or information relative to the calculation of MAPE and PERC95.</u>	<p>To integrate the current process; to ensure that all the data/information used in the calculation of FAS results are verified/validated. This requires active participation of the trading participants.</p> <p>Due process requirement.</p>
3.5 Market Operator	<u>3.5.2</u>	[NEW]	<u>The Market Operator shall provide to the Enforcement and Compliance Office all the market data and information necessary for the calculation of MAPE and PERC95 and for verification or validation of data, when necessary.</u>	To integrate the current practice. All market data used in the calculation of FAS by ECO are obtained from IEMOP.
SECTION 4 – FORECAST ACCURACY STANDARDS AND PROCEDURES			SECTION 4 – FORECAST ACCURACY STANDARDS, <del>AND PROCEDURES,</del> <u>AND SANCTIONS</u>	To align the title with the additional proposed sub-section on sanctions (Section 4.6)
4.1 Standards	4.1.2	The <i>MAPE</i> and <i>Perc95</i> of each <i>must dispatch generating unit</i> shall be calculated over the period starting on the 26 <sup>th</sup> of December of a year and ending on the 25 <sup>th</sup> of December of the succeeding year.	The <i>MAPE</i> and <i>Perc95</i> of each <i>must dispatch generating unit</i> shall be calculated <u>every billing period in cumulative results and shall be reported to each Generation Company within the timeline prescribed in Section 4.4 hereof. The annual cumulative results covering</u> <del>over</del> the period starting on the 26 <sup>th</sup> of December of a year and ending on the 25 <sup>th</sup> of December of the succeeding year <u>shall be determined with finality by the Enforcement and Compliance Office within the period prescribed in Section 4.4.6 of this Manual</u>	<p>To integrate the current procedure (due process requirement):</p> <p>Issuance of Monthly FASR – to afford the Generation Companies the opportunity to see the results, provide relevant data as basis for recalculation, if any, and be able to catch up by improving its performance in the succeeding months.</p>
	4.1.3	Subject to Section 4.5 of this <i>Market Manual</i> , <i>must dispatch generating units</i> who fail to meet the requisite forecast accuracy standards set out in Section 4.1.1 of this <i>Market Manual</i> may be liable for sanctions imposed under Clause 7.2	Subject to Sections <u>4.5 and 4.6</u> of this <i>Market Manual</i> , <u>the Generation Companies of the must dispatch generating units</u> <del>who</del> <u>which</u> fail to meet the requisite forecast accuracy standards <u>based on the annual Forecast Accuracy Standards Report shall be considered in breach of</u> <del>set out</del>	For clarity – only the breach based on annual (final) FAS results shall be subject to sanctions per WESM Penalty Manual.

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Title	Clause	Provision	Proposed Amendment	Rationale
		of the <i>WESM Rules</i> , and in accordance with the <i>WESM Penalty Manual</i> .	<del>in</del> Section 4.1.1 of this <i>Market Manual</i> <b>and</b> may be liable for sanctions imposed under Clause 7.2 of the <i>WESM Rules</i> , and in accordance with the <i>WESM Penalty Manual</i> .	
4.2 Calculations	4.2.6	A one hundred (100) percent FPE shall be imposed to a must dispatch generating unit for non-submission of projected output.	A one hundred (100) percent FPE shall be imposed to a must dispatch generating unit for non-submission of projected output. <b><u>The non-submission of projected output referred to in this section shall exclude submission of zero (0) MW nomination or cancellation of nomination based on the zero projection or load profile of the must dispatch generating unit.</u></b>	To distinguish active nomination of zero (0) MW or cancellation of nomination due to unavailability of the plant, from the non-submission at all.
	4.2.8	[NEW]	<p><b><u>For generating plants with expansion unit that is either on test and commissioning or in actual operation, as may be allowed by the rules, but is awaiting the issuance of the Certificate of Compliance or the Provisional Authority to Operate, the following shall apply:</u></b></p> <p><b><u>a) A zero (0) FPE shall be imposed if the projected quantity is less than the combined metered quantity.</u></b></p> <p><b><u>b) A one hundred (100) FPE shall be imposed if the projected quantity is greater than the combined metered quantity.</u></b></p> <p><b><u>For this purpose, the combined metered quantity shall refer to the sum of the metered quantity of the existing capacity unit and that of the expansion unit.</u></b></p> <p><b><u>This provision shall apply until the registered Pmax of the power plant or facility is updated in the WESM to include both the capacity of the existing and expansion unit.</u></b></p>	<p>To address changes and possible constraints in the nominations, meter readings of the existing unit, and additional unit while the latter is on test and commissioning stage or before the commercial operation registration.</p> <p>Note: The IEMOP cannot update the Pmax of the generating facility (original capacity plus expanded capacity) in the WESM registration unless the same is supported by COC/PAO even if it had been issued with FCATC already. The generation company could not yet nominate its full/combined capacity in the MMS-MPI. Meanwhile, the meter reading already reflects the total capacity. In such a situation, the generation company would be adversely affected by the results of the FPE if it will be based on the normal computation.</p>
4.3 Exclusions			4.3 Exclusions <b><u>and Other Basis for Recalculation</u></b>	Align the title with the additional provisions under this Sub-section
	<b><u>4.3.2</u></b>	[NEW]	<b><u>Any variance in the market data used in the calculation of MAPE and/or PERC95 that may be discovered during the monitoring and assessment must be properly addressed, validated, and verified within the prescribed timeline. The Generation Company shall provide adequate supporting documents to substantiate any claim of data variance. Only those data that have been proven and verified to be inaccurate, inconsistent, or erroneous shall be considered in the recalculation of the results.</u></b>	<p>To address the recurring problem on data inconsistency, non-updating, or variance.</p> <p>Due process requirement.</p>

<b>B. WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units</b>				
<b>Title</b>	<b>Clause</b>	<b>Provision</b>	<b>Proposed Amendment</b>	<b>Rationale</b>
<b>4.4. Monitoring, Reporting, and Review</b>	<b><u>4.4.1</u></b>	[NEW]	<u>The Enforcement and Compliance Office shall monitor the compliance of the Generation Company of each must dispatch generating unit, calculate the MAPE and PERC95 and issue the Preliminary Forecast Accuracy Standards Reports including the data used in the calculation within 30 business days from the end of the calendar month of the covered monitoring period. For instance, the Preliminary Forecast Accuracy Standards Report for September billing period shall be issued not later than 30 October.</u>	To provide general provision on monitoring and issuance of preliminary results to the trading participants.
	<b><u>4.4.2</u></b>	[NEW]	<u>The Generation Company shall provide a reply or confirmation of the MAPE and PERC95 results, as the case may be, to the Enforcement and Compliance Office within fifteen (15) business days from receipt of the Preliminary Forecast Accuracy Standards Report. If any of the circumstances fall within the exclusions and data variance under Section 4.3 of this Market Manual, the Generation Company shall likewise provide and submit the documents or proof thereof as basis for recalculation of the results.</u>	To afford the participants the opportunity to check the results and provide adequate basis for recalculation of the results, as may be allowed under Section 4.3 of the Manual  Due process requirement
	<b><u>4.4.3</u></b>	[NEW]	<u>The Enforcement and Compliance Office shall assess, validate, and verify the responses and documents submitted by the Generation Company. It may also consult the Market Operator, the System Operator, or the Metering Service Provider, as necessary, to ascertain the truthfulness of the claim or allegations of the Generation Company. The Enforcement and Compliance Office shall perform the recalculation, as may be appropriate.</u>	To ensure that there is adequate basis for recalculation.  Due process requirement
	<b><u>4.4.4</u></b>	[NEW]	<u>The Enforcement and Compliance Office shall issue the Final Forecast Accuracy Standards Report within seventy (70) business days from the end of the calendar month of the covered monitoring period regardless of whether a reply or confirmation is submitted by the concerned Generation Company or whether a recalculation of the results was performed for a particular must dispatch generating unit.</u>	To issue the final monthly results after recalculation. The ECO is mandated to issue the Final monthly reports – with or without change from preliminary results as official reference for the monthly performance or compliance of the MDGU.

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Title	Clause	Provision	Proposed Amendment	Rationale
	4.4.1	4.4.1 The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> the annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to its <i>projected outputs</i> within two (2) calendar months after the end of the period specified in Section 4.1.2.	<del>4.4.1</del> <b>4.4.5</b> The <i>Enforcement and Compliance Office</i> shall <b>submit a consolidated monthly</b> report to the <i>PEM Board</i> , <b>the Compliance Committee</b> , and the <i>DOE</i> <b>containing</b> the status of the compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards as of the most recent <i>Billing Period</i> with a <i>final statement</i> on a monthly basis <b>based on the Final Forecast Accuracy Standards Report within the same timeline provided in Section 4.4.4 of this Manual.</b>	<ul style="list-style-type: none"> <li>Re-arranged for coherence. Previously Section 4.4.2 with modification</li> <li>Renumbered to <b>4.4.5</b></li> <li>Included Compliance Committee in view of its oversight functions.</li> </ul>
	4.4.2	4.4.2 The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> the status of the compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards as of the most recent <i>Billing Period</i> with a <i>final statement</i> on a monthly basis.	<del>4.4.2</del> <b>4.4.6</b> The <i>Enforcement and Compliance Office</i> shall <b>likewise submit an annual consolidated</b> report to the <i>PEM Board</i> , <b>the Compliance Committee</b> , and the <i>DOE</i> the annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to its <i>projected outputs</i> within two (2) calendar months after the end of the period specified in Section 4.1.2. <b>on or before 31 March of the year following the covered monitoring period.</b>	<ul style="list-style-type: none"> <li>Re-arranged for coherence. Previously Section 4.4.1 with modification</li> <li>Renumbered to <b>4.4.6</b></li> <li>Provide a more definitive period for compliance</li> <li>Proposed period based on the calculated period to process one whole year of data.</li> <li>Included Compliance Committee in view of its oversight functions.</li> </ul>
	4.4.3	4.4.3 The <i>Market Operator</i> shall review annually the forecast accuracy standards set in Section 4.1 and shall provide recommendation to the <i>PEM Board</i> and the <i>DOE</i> .	<del>4.4.3</del> <b>4.4.7</b> The <i>Market Operator</i> <b>or the Enforcement and Compliance Office</b> shall review annually the forecast accuracy standards set in Section 4.1 and shall provide recommendation to the <i>PEM Board</i> and the <i>DOE</i> .	<ul style="list-style-type: none"> <li>Renumbered to <b>4.4.7</b></li> <li>To include ECO being the office in charge of the monitoring of FAS.</li> </ul>
<b>4.5 Transition Period</b>	4.5.1	A <i>transition period</i> covering the period specified by the <i>DOE</i> shall be implemented. The sanction on the non-compliance with the forecast accuracy standards shall be implemented upon the commercial operation of the enhanced <i>WESM</i> design and operations.	A <i>transition period</i> <b>shall be six (6) months</b> covering the period specified by the <i>DOE</i> shall be implemented. The sanction on the non-compliance with the forecast accuracy standards shall be implemented upon <b>from</b> the commercial operation of the enhanced <i>WESM</i> design and operations <b>unless extended by the DOE through appropriate issuance.</b>	<p>To reflect the current practice (as consulted with DOE – DOE will no longer issue formal issuance re: lifting of transition period; and the monitoring officially starts in January 2022 billing period).</p> <p>Given that the annual FAS rating is reckoned from 26 December of the year until 25 December of the succeeding year, the annual FAS rating could NOT be computed for 2021 as the EWDO commenced only on 26 June 2021 (or short of 6 months for annual rating).</p>

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Title	Clause	Provision	Proposed Amendment	Rationale
				The annual FAS rating (Jan to Dec billing period) could be computed beginning January 2022
<b>4.6 PENALTIES AND SANCTIONS</b>		[NEW]	New sub-section	For clarity of the application of the penalty based on possible sets of circumstances.
	4.6.1	[NEW]	<u>One breach is counted for each category of forecast accuracy standard that was not complied with based on the Annual Forecast Accuracy Standards Report. The breach of MAPE and PERC95 shall be counted as separate breach even if they occur on the same period subject to penalty under Clause 7.2 of the WESM Rules and the relevant provisions of WESM Penalty Manual.</u>	For clarity: separate finding for MAPE and PERC95; and separate penalty imposition; consistent with the provisions of the WESM Penalty Manual.
	4.6.2	[NEW]	<u>The Generation Company with must dispatch generating unit that is in operation for less than a year and is found in breach of MAPE or PERC95, shall be:</u>  <u>a) imposed a penalty in proportion to the number of months in operation during the covered monitoring year. For instance, the plant commenced operation on 26 March, the financial penalty to be imposed shall be in proportion to the nine (9) billing months over the twelve (12) month-period.</u>  <u>b) exempted from liability, if it commences operation within three (3) months prior to the end of the covered monitoring year.</u>  <u>A must dispatch generating unit shall be considered in operation, for purposes of this Section, upon commencement of its operation or participation in the WESM either by virtue of the Final Certificate of Approval to Connect or the commercial operation registration in the WESM, whichever is applicable.</u>	To consider situation where the duration of commercial operation is less than one year.  For (a): duration of commercial operation within the year is 9 months and above. Proportionate penalty.  For (b): duration is less 3 months or less. MDGUs which commenced operation in October, November, and December billing period – exempted. This is in consideration of the adjustments during the initial period of operation.  Reckoning of operation: Issuance of FCATC (if plant opts to operate already); or commercial operation registration, as the case may be.
<b>SECTION 5 – AMENDMENT, PUBLICATION, AND EFFECTIVITY</b>  <b>5.3 Effectivity</b>	5.3.2	[NEW]	<u>The amendments made herein and approved pursuant to the Procedures for Changes to the WESM Rules, Retail Rules and Market Manuals shall have a retroactive effect from the beginning of the year that the said amendments are approved, unless the application thereof becomes inequitable and impracticable under the circumstances. For avoidance of doubt, the amended provisions that are given retroactive effect shall be indicated in the PEM Board resolution and/or DOE issuance approving or promulgating them.</u>	The final FAS results are cumulative in nature and are determined on annual basis. It would be impractical to have different sets of the governing rule in different months in one year. Thus, to always ensure uniformity and practicality in the application of the rules/provisions, the same should be applied for the whole year.  For instance, the amendment is approved in July 2023, it shall be

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Title	Clause	Provision	Proposed Amendment	Rationale
				<p>applied from January to December 2023 billing period.</p> <p><i>“unless the application thereof becomes inequitable and impracticable under the circumstances” –to consider the prospective application of the amendment in the event that it would become unjust or affect the vested rights of the generation company (e.g. stricter rule).</i></p>