

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 1 of 124

**ATTENDEES**

No.	Name	Designation/Position	Department/Company
1	Concepcion I. Tanglao	Chairperson, Independent	RCC
2	Jesusito G. Morillos	Member, Independent	RCC
3	Jose Roderick F. Fernando	Member, Independent	RCC
4	Dixie Anthony R. Banzon	Member, Generation Sector	RCC
5	Rose Ann O. Alfaro	Member (Alternate), Generation Sector	RCC
6	Cherry A. Javier	Member, Generation Sector	RCC
7	Carlito C. Claudio	Member, Generation Sector	RCC
8	Jessie B. Victorio	Member (Alternate), Generation Sector	RCC
9	Mark D. Habana	Member, Generation Sector	RCC
10	Michelle S. Tuazon	Member (Alternate), Generation Sector	RCC
11	Ryan S. Morales	Member, Distribution Sector	RCC
12	Manuel Luis Zagala	Member (Alternate), Distribution Sector	RCC
13	Nelson M. Dela Cruz	Member, Distribution Sector	RCC
14	Virgilio C. Fortich, Jr.	Member, Distribution Sector	RCC
15	Ricardo G. Gumalal	Member, Distribution Sector	RCC
16	Lorreto H. Rivera	Member, Supply Sector	RCC
17	Dennis R. Paragas	Member (Alternate), Supply Sector	RCC
18	Ambrocio R. Rosales	Member, System Operator	RCC
19	Isidro E. Cacho, Jr.	Member, Market Operator	RCC
20	Elvin Hayes E. Nidea	Chief Governance Officer	PEMC
21	Karen A. Varquez	RCC Secretariat	PEMC
22	Divine Gayle C. Cruz	RCC Secretariat	PEMC
28	Dianne L. De Guzman	RCC Secretariat	PEMC
29	Kathleen R. Estigoy	RCC Secretariat	PEMC
30	John Mark S. Catriz	RCC Secretariat	PEMC
31	Neil Patrick F. Perez	Market Assessment Group	PEMC
32	Andrea J. Mendiola	Legal	PEMC
33	Clares Loren C. Jalocon	Corporate Planning and Communications	PEMC
34	Romellen C. Salazar	Corporate Planning and Communications	PEMC
35	Athena Grace C. Merrera	Corporate Planning and Communications	PEMC
36	Ria Crizette B. Alegre	Office of Chief Governance Officer	PEMC
37	Melanie Papa	Observer	DOE
38	Jhannelyn D. Marasigan	Observer	DOE
39	Karen Anne H. Siruma	Proponent	IEMOP
40	Arjon B. Valencia	Proponent	IEMOP
41	Edward I. Olmedo	Proponent	IEMOP
42	Sheryll M. Dy	Proponent	IEMOP

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MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 2 of 124

ATTENDEES

No.	Name	Designation/Position	Department/ Company
43	Katrina A. Garcia-Amuyot	Proponent	IEMOP
44	Jenny I. Jalandoni	Proponent	IEMOP
45	Mary Anne T. Santiago	Proponent	IEMOP
46	Lex Magtalas	Observer	APC
47	Gian Karla C. Gutierrez	Observer	First Gen
48	Angelica Diane B. Monteza-Sy	Commenter	MERALCO
49	Roma Angela P. Hofilena	Commenter	MERALCO
50	Ma. Elisha S. Eloriaga-Dolatre	Commenter	MERALCO
51	Daryl Dennise D.G. Estrella	Commenter	MERALCO

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 3 of 124



Agenda	Agreements / Action Taken / Action Required
<ul style="list-style-type: none"> Call to Order 	<ul style="list-style-type: none"> The meeting was conducted via Microsoft Teams and was called to order at 9:02 AM. The meeting was presided by Ms. Concepcion I. Tanglao (Chairperson/Independent).
<ul style="list-style-type: none"> Determination of Quorum 	<p>There were 14 principal members, and 2 alternate members present.</p>
<ul style="list-style-type: none"> Adoption of Agenda 	<p>The agenda was approved as revised:</p> <ul style="list-style-type: none"> Approval of the minutes of 200th RCC Meeting (Caucus) was deleted and deferred as requested by the Secretariat.
<ul style="list-style-type: none"> Approval of Minutes of Previous Meeting <ul style="list-style-type: none"> 201st (Regular) Meeting, 16 September 2022 	<p><u>Presenter:</u> Ms. Dianne L. De Guzman (Secretariat)</p> <p><u>Action Requested:</u> For approval</p> <p><u>Agreement:</u></p> <p>The draft minutes was approved as amended.</p>
<ul style="list-style-type: none"> RCC Strategic Planning Workshop for 2023 to 2025 Activities 	<p><u>Presenters:</u> Ms. Romellen C. Salazar (PEMC-CPC) Ms. Karen A. Varquez (RCC Secretariat) Ms. Divine Gayle C. Cruz (RCC Secretariat)</p> <p><u>Material:</u> Annex A – 2022 Planning Workshop with Rules Change Committee</p> <p><u>Action Requested:</u> For discussion</p> <p><u>Proceedings:</u></p> <ul style="list-style-type: none"> Ms. Salazar (PEMC) presented PEMC’s draft corporate strategic plan (CSP) for 2023 to 2025 regarding market development priorities. The objective of the workshop is to consult with RCC to ensure that the RCC’s workplan for the next three years is aligned with PEMC’s goals and objectives. The CSP, with inputs from all WESM Governance Committees including the RCC, shall be submitted to the PEM Board for approval within November 2022.

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 4 of 124



Agenda	Agreements / Action Taken / Action Required
	<ul style="list-style-type: none"> • Ms. Varquez (Secretariat) presented and gave an overview of the following rules change proposals lined up for the next three years (see Annex A): <ul style="list-style-type: none"> ○ 11 proposals to be initiated by PEMC and/or WESM Governance Committees ○ 7 possible rules change proposals based on issues raised during RCC meetings • The RCC further identified seven (7) possible rules change proposals to be eventually initiated by PEMC, IEMOP, System Operator, generation sector, distribution sector or supply sector to be included in its work plan over the next 3 years and for consideration in PEMC's corporate strategic plan (see Annex A). • Other than rules changes related to market developments, the RCC likewise agreed for the Secretariat to pursue obtaining ISO 37000:2021 certification on Governance of Organizations. Atty. Morallos explained that given the role of the RCC in assisting the PEM Board in the rules change process, the certification and training would guide the processes of the RCC and Secretariat in the area of good governance in general, and specifically, to align with the governance framework of the EPIRA. Atty. Morallos added that through trainings associated with securing the certification, the RCC and Secretariat would be adopting an international benchmark on good governance based on experience of international institutions. This project will be proposed to the CGO and PEM Board as this project may be eventually adopted by the entire PEMC organization as initiated by the RCC. <p>Ms. Varquez thereafter explained as of this time, there are no local consultants and training providers for this certification because the standard is relatively new, although online training may also be an option.</p> <p>Atty. Morallos also confirmed Ms. Tanglao's clarification that it would be the PEMC organization, as the WESM's governance body, who would be ultimately certified and not the RCC itself since the latter is only a committee. He added that the RCC would only be trained to be familiarized with the provisions or elements covered by the ISO standard. Ms. Tanglao stated that obtaining the certification could be a long</p>

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 5 of 124

Agenda	Agreements / Action Taken / Action Required
	<p>project to undertake, perhaps 1 to 2 years. Mr. Claudio added that PEMC will also need to set up its processes to secure the ISO standard so the project may spill-over beyond 2025. Atty. Morillos agreed and stated that at least initial preparations for the project could be done within the covered period of the strategic plan such as familiarization and exposure with the principles of the standard.</p> <ul style="list-style-type: none"> • The RCC noted the status of proposals it endorsed to the PEM Board and DOE, as well as those currently under RCC's evaluation in 2022 and as of 21 October (see Annex A): <ul style="list-style-type: none"> ○ 3 proposals promulgated by DOE ○ 7 proposals awaiting DOE approval ○ 4 proposals under RCC evaluation ○ 1 proposal on-going further study (by DRA) • PEMC requested RCC members to provide further inputs to the strategic plan, in consultation with their respective sectors, if any, until 28 October 2022 (Friday).
<ul style="list-style-type: none"> • Matters Arising from Previous Meeting 	
<p>6.1. Draft RCC Resolution No. 2022-11: <i>Proposed Amendments to the WESM Manual on Registration, Suspension and De-registration Criteria and Procedures regarding Penalty Framework on Test and Commissioning</i></p> <p>a) Other provisions for updating in line with DC2022-05-0015 as raised by IEMOP</p> <p>b) Updates on IEMOP letter to DOE regarding Implementation of DOE DC 2022-06-0022 (General Enhancements to the Application Process of New WESM Members)</p>	<p><u>Presenter:</u> Ms. Divine Gayle C. Cruz (Secretariat)</p> <p><u>Action Requested:</u> For approval for submission to PEM Board</p> <p><u>Materials:</u></p> <ol style="list-style-type: none"> 1) Annex B – Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning 2) Annex C – Proposed Updating of Registered Capacities <p><u>Proceedings:</u></p> <p>a) <i>Other provisions for updating in line with DC2022-05-0015 as raised by IEMOP</i></p> <ul style="list-style-type: none"> • Ms. Cruz (Secretariat) presented additional proposed amendments to PEMC's proposal regarding Penalty Framework for Test and Commissioning to harmonize it more completely with DOE DC 2022-05-0015. Further amendments were proposed to the WESM Rules, WESM Manual on Dispatch Protocol and WESM Manual on Registration,

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 6 of 124



Agenda	Agreements / Action Taken / Action Required
	<p>Suspension and De-registration Criteria and Procedures (see Annex B; additional proposed amendments in yellow rows).</p> <ul style="list-style-type: none"> • The RCC Secretariat transmitted via email the revised matrix of proposed amendments to both PEMC-ECO and IEMOP for their review, and to solicit comments/inputs if any. <p>Atty. Hazel Gubaton-Lopez (PEMC-ECO) suggested changing the timeline on the MO's submission to ECO of report regarding status of generating units on test and commissioning, from "bi-monthly" to "monthly". This is to be consistent with the current practice of IEMOP in providing the status to PEMC, as well as with the timeline of monitoring by ECO which is also on monthly basis. With IEMOP agreeing with said suggestion, the RCC adopted the revision.</p> <ul style="list-style-type: none"> • Ms. Cruz stated that the additional amendments aim to emphasize the obligations of generating units that secured FCATC but still awaiting COC from the ERC to the following: <ol style="list-style-type: none"> i. Submission of nomination of loading levels or projected outputs, as applicable ii. Compliance with dispatch schedules or dispatch instructions iii. Compliance with the dispatch conformance standards or forecast accuracy standards, as applicable <p>As regards required submissions to the Market Operator for the purpose of scheduling, Ms. Cruz further explained that unlike when a generating unit is under test and commissioning wherein their nominations is through the System Operator's imposition of non-security overriding constraints, generating units with FCATC but still awaiting COC or PAO are already obligated to submit their nominations and projected outputs (quantity only), similar with non-scheduled generating units. To facilitate this, additional proposed amendments were made which states that the Market Operator shall grant full access to the Market Participant Interface (MPI) for those concerned generating units. Ms. Siruma explained that full access to the MPI shall be allowed once the Market Operator has received a copy of the FCATC.</p> <ul style="list-style-type: none"> • Mr. Olmedo explained that the additional amendments, per the DOE DC2022-05-0015, shall provide procedures during

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MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 7 of 124



Agenda	Agreements / Action Taken / Action Required
	<p>the gap period between when the generating units has obtained their FCATC following completion of test and commissioning but were still not issued with COC from the ERC. Following implementation queries from Ms. Javier and Messrs. Banzon, Claudio and Rosales, Mr. Olmedo and Ms. Siruma provided the following clarifications:</p> <ul style="list-style-type: none"> ○ Must-dispatch generating units shall essentially follow the same procedures regarding submission of their projected outputs when they are still awaiting COC and when they go into Commercial Operations. But for scheduled generating units with FCATC and awaiting COC, they can only submit day-ahead nominations in the interim and shall only be allowed to submit offers (price) when they go on Commercial Operations. ○ The generating unit concerned will no longer be imposed with overriding constraints by the System Operator (as when they are under test and commissioning) and shall submit nominations and projected outputs through the MPI instead. Once the Market Operator receives a copy of a generating unit's FCATC, it shall observe internal procedures and timelines whereby it will coordinate with the WESM Member to facilitate their submissions via the MPI. ○ The generating units concerned shall not be penalized against the requirement to nominate up to its Pmax because, under the circumstances, they technically still do not have certified Pmax which is indicated in the COC. However, if they are available to run, they still need to submit nominations of loading levels/loading profile or projected output (megawatt output) for each dispatch interval. ○ Nominations and projected outputs of the subject generating units will be automatically committed in the scheduling, similar with the treatment of nominations and projected outputs of solar, wind and run-of-river hydro generating units. The revised proposed amendment calls for including the nominations and projected outputs of those generating units with FCATC and awaiting COC under the category of 'self-scheduled nominations' in the WESM Dispatch Protocol Manual.



MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 8 of 124

Agenda	Agreements / Action Taken / Action Required
	<ul style="list-style-type: none"> ○ As to compensation, generating units with FCATC but awaiting COC are entitled to WESM payments based on prevailing market prices (i.e., price-taker) and are allowed to declare bilateral contract quantities. ● For compliance monitoring, Atty. Hazel Gubaton-Lopez (PEMC-ECO) clarified that generating units with FCATC and awaiting COC will be monitored for compliance to dispatch schedule in accordance with their declared nominations. If they opted not to submit nominations or projected outputs and did not generate, they will not be flagged against the 'must-offer rule'. However, if they do not submit their output and yet they generated, then they will be flagged by the system. ● IEMOP informed the RCC that it shall submit additional proposed amendments to the WESM Registration Manual regarding the use of NGCP Generating Unit Capability Test as reference document for the Market Operator to update a generating unit's capacity if it has obtained FCATC but still awaiting its COC. This amendment shall address the issue of such generating units being restricted from nominating loading levels that is different from what was indicated in the ERC Form 7 when it first registered in the WESM for test and commissioning. <p>b) <i>Updates on IEMOP letter to DOE regarding Implementation of DOE DC 2022-06-0022 (General Enhancements to the Application Process of New WESM Members)</i></p> <p>Ms. Siruma (IEMOP) stated that as of date, there is still no update from the DOE. She also confirmed that the revised proposal presented by the RCC Secretariat aligns the same with DC 2022-05-0015.</p> <p><u>Agreement/s:</u></p> <p>The RCC provisionally approved the proposal pending IEMOP's additional amendments to the Registration Manual. The specific provision to be amended shall be submitted to the RCC via email</p>



MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 9 of 124

Agenda	Agreements / Action Taken / Action Required												
<p>6.2. Draft RCC Resolution No. 2022-12: <i>Proposed Amendments to the WESM Manual on Billing and Settlement regarding Additional Compensation</i></p>	<p>and once approved, shall be incorporated in the final RCC resolution and matrix.</p> <p><u>Presenter:</u> Ms. Dianne L. De Guzman (Secretariat)</p> <p><u>Action Requested:</u> For approval for submission to PEM Board</p> <p><u>Materials:</u> Annex D – Simulation on Use of MQ for Additional Compensation During Market Intervention/Suspension</p> <p><u>Proceedings:</u></p> <ul style="list-style-type: none"> As the RCC requested in the previous meeting, Mr. Olmedo presented a simulation on the rate impact (P/kWh) of using gross energy settlement quantity (or metered quantity) for determining additional compensation quantity during market intervention or market suspension. The samples cover the billing months from July 2021 to July 2022 (see Annex D for simulation results). Mr. Olmedo first explained that if administered prices shall be used, scheduled generation is computed based on the most recent dispatch target. Dispatch target may be based on either RTD or the System Operator’s dispatch instruction, if available. This serves as the “cap” which determines the quantity for which the generating unit may be compensated. <div data-bbox="630 1473 1497 1962" style="border: 1px solid black; padding: 10px;"> <p>Background</p> <p>Current Determination of Additional Compensation Quantity</p> <p><input type="checkbox"/> Based on WESM Billing and Settlement Manual Section 10.3</p> <table border="1" data-bbox="678 1597 1457 1731"> <thead> <tr> <th>Compensation Type</th> <th>Pre-Condition on Determining AddComp Qty</th> <th>Formula to be Used</th> </tr> </thead> <tbody> <tr> <td>Designation as Must-Run Unit</td> <td>None</td> <td>ACQ = GESQ - BCQ - ASIE</td> </tr> <tr> <td>Due To Administered Price Due To Secondary Price Cap Due To PSM for Congestion</td> <td>If GESQ <= (SG + Allowable Upward Deviation)</td> <td>ACQ = GESQ - BCQ - ASIE</td> </tr> <tr> <td>Designation as Constrain-on Generation (MOT)</td> <td>If GESQ > (SG + Allowable Upward Deviation)</td> <td>ACQ = SG - BCQ - ASIE</td> </tr> </tbody> </table> <p>Where: ACQ refers to the Additional Compensation Quantity GESQ refers to the Gross Energy Settlement Quantity (or metered quantity) BCQ refers to the sum of Bilateral Contract Quantity ASIE refers to the Ancillary Service Incidental Energy SG refers to Scheduled Generation</p> <p>  During Use of Administered Prices (i.e., Market Intervention or Market Suspension) <ul style="list-style-type: none"> Scheduled Generation is computed based on the most recent dispatch target <ul style="list-style-type: none"> Dispatch Target is based on RTD schedule from the Market Operator (MMS), or a dispatch instruction from the System Operator </p> <p> IEMOP</p> </div> <ul style="list-style-type: none"> When market intervention or suspension is declared due to erroneous or unavailable RTD schedule and there is no 	Compensation Type	Pre-Condition on Determining AddComp Qty	Formula to be Used	Designation as Must-Run Unit	None	ACQ = GESQ - BCQ - ASIE	Due To Administered Price Due To Secondary Price Cap Due To PSM for Congestion	If GESQ <= (SG + Allowable Upward Deviation)	ACQ = GESQ - BCQ - ASIE	Designation as Constrain-on Generation (MOT)	If GESQ > (SG + Allowable Upward Deviation)	ACQ = SG - BCQ - ASIE
Compensation Type	Pre-Condition on Determining AddComp Qty	Formula to be Used											
Designation as Must-Run Unit	None	ACQ = GESQ - BCQ - ASIE											
Due To Administered Price Due To Secondary Price Cap Due To PSM for Congestion	If GESQ <= (SG + Allowable Upward Deviation)	ACQ = GESQ - BCQ - ASIE											
Designation as Constrain-on Generation (MOT)	If GESQ > (SG + Allowable Upward Deviation)	ACQ = SG - BCQ - ASIE											

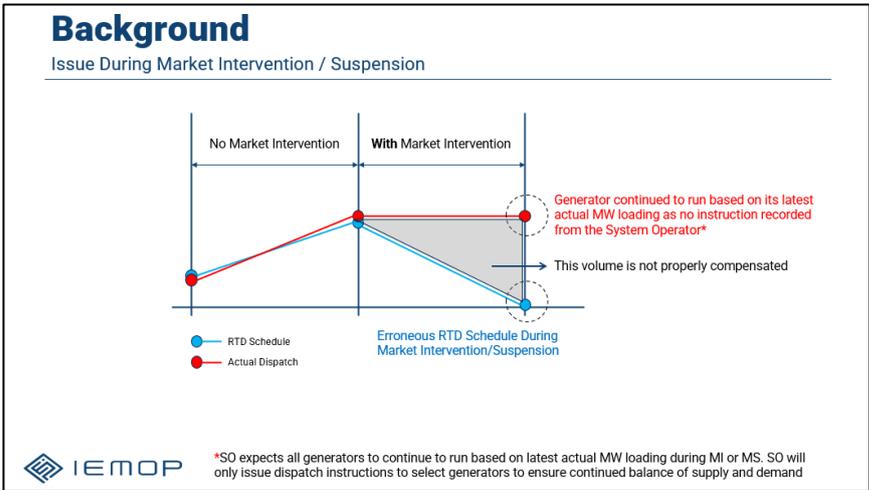


MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 10 of 124

Agenda	Agreements / Action Taken / Action Required
--------	---

dispatch instruction from the System Operator, generators are expected to continue running based on their latest actual MW loading. If the current formula for additional compensation quantity is applied (i.e., $ACQ = SG - BCQ - ASIE$), the generator that continued to maintain its loading level will not be properly compensated since the basis for scheduled generation is on the erroneous RTD schedule.



- The simulation shows what may happen if instead of the RTD schedule, the System Operator’s dispatch instruction, if available, or the metered quantity is used in the computation of additional compensation quantity (see Annex D for simulation results).

Simulation

- RCC requested IEMOP to simulate impact of IEMOP proposal where:
 - The objective is to avoid use of RTD during MI or MS, hence, AddComp Quantity shall be
 - SO Dispatch Instruction, if there is any, or
 - GESQ (or MQ)
- Generally, the AddComp Quantity is expected to increase, thus, the Additional Compensation shall increase
- The following formula was used to compute for the expected increase in WESM rate (in P/kWh) should the proposal be implemented

$$\text{Rate Increase for Each Month} = \frac{\sum_{i=1}^n \sum_{k=1}^m (\text{New AddComp Qty}_{k,i} - \text{Old AddComp Qty}_{k,i}) \times (\text{Approved Rate}_{k,i} - \text{FEDP}_{k,i})}{\text{Total Spot Quantity for the Month}}$$

Where:
 New AddComp Qty_{k,i} refers to the New Additional Compensation Quantity (based on proposal) of generator k at dispatch interval i
 Old AddComp Qty_{k,i} refers to the Old Additional Compensation Quantity (status quo) of generator k at dispatch interval i
 Approved Rate_{k,i} refers to the approved rate for additional compensation of generator k at dispatch interval i
 FEDP_{k,i} refers to the WESM final energy dispatch price of generator k at dispatch interval i
 Total Spot Quantity for the Month refers to the total kWh spot quantity recorded for the month

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 11 of 124



Agenda	Agreements / Action Taken / Action Required
	<ul style="list-style-type: none"> • The RCC noted that the rate impact (P/kWh) shall be applied only to the spot quantity offtake of Customers, and not to the entire GESQ (i.e., exclude bilateral contract quantity and ancillary service incidental energy). • Mr. Olmedo clarified that payment for Ancillary Service Incidental Energy (ASIE) is included in the System Operator's ASPA, not in the WESM. Thus, ASIE is excluded in the computation of additional compensation quantity. • The RCC likewise noted that there are already existing procedures in the Market Manual on Billing and Settlements for staggered or installment collection of payments for additional compensation, based on a threshold of rate impact. • The RCC adopted additional proposed provisions from IEMOP to the Billing and Settlement Manual based on MERALCO's comment regarding the publication of additional compensation statements for the validation and information of Customers, subject to provisions on information and confidentiality. <p><u>Agreement/s:</u></p> <ul style="list-style-type: none"> • The RCC approved the endorsement of the proposal to the PEM Board embodied in RCC Resolution No. 2022-11, as amended.
<p>6.3. Update on PEM Board Directive on the Proposed Amendments regarding Non-Security Overriding Constraints (RCC Resolution No. 2022-09)</p>	<p><u>Presenter:</u> Ms. Divine Gayle C. Cruz (Secretariat)</p> <p><u>Action Requested:</u> For discussion</p> <p><u>Proceedings/Agreements:</u></p> <ul style="list-style-type: none"> • The Secretariat requested clarification on the RCC's decision to "set aside the proposal" during the last RCC meeting. Ms. Cruz explained that the RCC would need to document its decision in a resolution, for PEM Board approval.

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 12 of 124



Agenda	Agreements / Action Taken / Action Required
	<ul style="list-style-type: none"> • Ms. Cherry Javier (Generation) informed the RCC of the recently promulgated DOE DC No. 2022-10-0031 (Preferential dispatch of all generating units utilizing RE resources in the WESM), which may address the concerns of NPC in its proposal. The RCC then requested the Secretariat to review the proposal in consideration of the said DOE DC, for discussion in the next meeting. • Mr. Claudio mentioned the following matters that may be studied: <ul style="list-style-type: none"> ○ If NPC's concerns will be addressed if all hydropower plants will be considered preferential dispatch; ○ If a hydropower generating unit is considered as preferential dispatch generating unit, what would be the impact if it has an ASPA with NGCP or if it wants to submit reserve offer in the Reserve Market.
<ul style="list-style-type: none"> • New Business 	
<p>7.1. Comments on the Proposed Amendments to Retail Rules and Various Retail Manuals on Requiring for Certification of No Outstanding Balance as Switching Requirement for Retail Customers</p>	<p><u>Presenter:</u> Ms. Karen Anne H. Siruma (IEMOP)</p> <p><u>Action Requested:</u> For deliberation</p> <p><u>Material/s:</u> Annex E – Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance</p> <p><u>Proceedings:</u></p> <ul style="list-style-type: none"> • The proposal received comments from PEMC and MERALCO to which IEMOP provided responses (see Annex E). Ms. Siruma reiterated that the proposal is based on feedback received by the Central Registration Body regarding the difficulty of some Contestable Customers in complying with the requirement for obtaining certification of no outstanding balance, which affects their timely switching to another RES. • The RCC deliberated on the proposal and had extensive discussions whether a settlement agreement and undertaking co-signed by both the customer and NSP or incumbent supplier should be allowed as alternatives to the requirement to submit certification of no outstanding balance prior switching of Retail Customers.

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 13 of 124



Agenda	Agreements / Action Taken / Action Required
	<p>Ms. Angelica Diane B. Monteza-Sy (MERALCO) posed the following concerns:</p> <ul style="list-style-type: none"> ○ Accepting such alternatives will not satisfy the requirement that the Customer should have fulfilled its outstanding financial obligations to the incumbent NSP or DU before switching, as prescribed in the ERC's Supplemental Switching Rules. ○ If accepting a settlement agreement is allowed, the DU is put in a situation where it is the one who needs to have a settlement arrangement with the Customer, when the existing rules of the ERC states that it should be the Customer who must settle its financial obligations. It is clarified that the subject certification is issued by the DU once the Customer has settled its outstanding obligations. ○ A settlement agreement is not pro forma and would depend on each Retail Customer. This is taxing when it comes to negotiation with each Retail Customer who chooses this option and may possibly even delay the switching process. DUs may be called out if such delay happens. <p>• As additional information, Ms. Katrina Garcia-Amuyot (IEMOP) stated that the usual cause of delay for the issuance of certification of no outstanding balance is due to difference in interpretation by the parties of their contractual obligations.</p> <p>Mr. Manuel Luis Zagala (MERALCO) stated that disputes between the parties involved is not something for the CRB to settle and should be best left outside the market. Moreover, if there is any concern related to the DU deliberately delaying or preventing the switch, there are already available avenues that the Customer could take to make the switch happen, and the matter of the DUs' deliberate delay can be raised and settled.</p> <ul style="list-style-type: none"> • Mr. Morales commented that accepting settlement agreements may give the impression that MERALCO is discriminating since it will have the option to sign off or not on a settlement agreement with its Customer. If the existing ERC rules are merely observed, then MERALCO does not have to exercise discretion since the question is only whether the Customer has paid or not.

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 14 of 124



Agenda	Agreements / Action Taken / Action Required
	<ul style="list-style-type: none"> Mr. Fortich (CEBECO) commented that the DUs' or NSPs' side should also be considered such that there should also be protection from and prevention of non-paying Customers from contracting with other suppliers. If the settlement agreement is not complied, the DUs may not be able to fulfill its own obligations. <p>Mr. Gumalal (ILPI) added that it would be difficult for the DUs to enforce payment of outstanding obligations if their Customer has already switched. He added that DUs are able to disconnect non-paying Customers but would be unable to do so when such Customers already switched to a RES.</p> <p>Mr. Rosales also posed another scenario whereby even if the DU has initially agreed with the settlement agreement and the Customer was able to switch, but the Customer is unable to pay in the end, then the burden would be on the DU to enforce the settlement agreement.</p> <ul style="list-style-type: none"> On the proposed option of accepting an undertaking to pay in order to start the switching process, Atty. Fernando remarked that this may be impractical since it would be more difficult to order a Customer to pay since they are not regulated entities, than to direct MERALCO to refund. <p>Atty. Morillos commented that for settlement agreements, this could be acceptable since the DUs would have to sign off on this if they are satisfied with terms of said agreement with their Customer (e.g., deposit has been paid). This could be considered as an incurred payment rather than accrued payment for the side of the DUs.</p> <ul style="list-style-type: none"> As regards whether to allow settlement agreement as alternative to certification of no outstanding balance, the RCC put the matter to a vote with six (6) members in favor of allowing it (Messrs. Banzon, Claudio, Cacho, Fernando, Morillos; and Ms. Rivera) and five (5) members not in favor (Messrs. Morales, Fortich, Gumalal, Dela Cruz and Rosales). <p><u>Agreements:</u></p> <p>Noting the concerns raised by the DUs, the RCC agreed to continue the deliberations in the next meeting and request ERC to</p>

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 15 of 124



Agenda	Agreements / Action Taken / Action Required
	comment on the issues raised in particular, whether the proposed settlement agreement and undertaking would satisfy the requirements before switching, as prescribed in the ERC's Supplemental Switching Rules.
<p>7.2. Additional Compensation</p> <p>a) Implementation of DOE DC2022-06-0025: Timeline for Filing of Additional Compensation</p> <p>b) Inconsistency in the non-exhaustive list of documents required in filing claims for additional compensation among the different market events</p> <p>c) Non-tagging of constrained-on generators during network congestion/PSM event</p>	<p><u>Presenter:</u> Mr. Carlito C. Claudio (MEI/PEI) Mr. Jessie B. Victorio (MEI/PEI)</p> <p><u>Action Requested:</u> For discussion</p> <p><u>Material/s:</u> Annex F – Presentations of MEI/PEI</p> <p><u>Proceedings:</u> The RCC noted the issues raised by MEI/PEI related to additional compensation:</p> <p>a) <i>Inconsistency between the ERC and DOE directives regarding the timeline for filing of additional compensation</i></p> <ul style="list-style-type: none"> • Mr. Claudio pointed out the inconsistency on the timelines for filing additional compensation between the ERC Decision on ERC Case No. 2017-042RC and the recently promulgated DOE DC2022-06-0025, which is reflected in the WESM Manual on Billing and Settlement Issue 11.1 that took effect on 27 August 2022. • The RCC noted the DOE's position that DC2022-06-0025 effective on 27 August 2022 should prevail since the issue is not related to pricing which is the ERC's jurisdiction. • IEMOP informed that it will send a letter to ERC, copy furnished PEMC, that it will implement the said DOE circular, and shall issue the corresponding advisory/ies to participants noting the revised timelines. <p>b) <i>Inconsistency in the non-exhaustive list of documents required in filing claims for additional compensation among the different market events</i></p> <ul style="list-style-type: none"> • Mr. Claudio continued with the presentation of the differences in the non-exhaustive list of requirements for claiming additional compensation between MRU,

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 16 of 124



Agenda	Agreements / Action Taken / Action Required
	<p>Administered Price (AP) and Constrain-on (MOT) on one hand, and for Secondary Price Mechanism (SPM) and Price Substitution Mechanism (PSM) on the other. Specifically, the former set of market events (MRU/AP/MOT) expressly include ERC-approved rates as supporting document in filing for additional compensation but does not include ERC-approved rates for SPM. He pointed out that the list of supporting documents should be the same across all market events.</p> <ul style="list-style-type: none"> • Mr. Claudio added that if only the list of Variable O&M costs is admissible (as ERC-approved rates is currently not included), these may not be sufficient to recover the cost in complying with SPM. Moreover, only consumable items are being considered for payment by IEMOP in the list of Variable O&M costs. • Per IEMOP's prior discussion with the ERC on this matter, ERC advised that concerned parties may file a rule-making proposal before the ERC. <p>c) <i>Non-tagging of constrained-on generators during network congestion/PSM event</i></p> <ul style="list-style-type: none"> • Mr. Jessie B. Victorio (MEI/PEI) continued with a presentation of issues encountered related to MEI/PEI's Limay generating units: <ul style="list-style-type: none"> ○ There are instances when some Limay units were not properly tagged by the SO as constrained-on generators. Prior to the non-tagging, there is also an issue that MEI/PEI cannot maximize the allowable 14-working day period since being constrained-on for filing additional compensation because it still has to rely from the Market Operator's Report and the System Operator's Dispatch Instruction Report which are released after a week from the constrained-on event. Without these references, it has no basis upon which to claim for additional compensation. ○ Some Limay units were not tagged as constrained-on during an interval with a lower Final Market Price. Limay being a merchant unit, it will be paid only at spot price which is not sufficient to cover the costs of generation. Since it was not properly tagged as constrain-on, it has no basis to file for additional compensation.

MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 17 of 124

Agenda	Agreements / Action Taken / Action Required
	<ul style="list-style-type: none"> ○ Another issue raised is being paid only at the quantity equivalent to Limay's AS schedule although it was called by the System Operator to run beyond said schedule with it serving as regulating reserve. ○ There were instances when Limay units come from a higher dispatch then re-dispatched as "MOT Lower" due to system requirements. These instances are currently not allowed to file for additional compensation. ● Mr. Rosales noted the foregoing concerns of MEI/PEI and stated that NGCP shall validate and review these issues. MEI/PEI and the System Operator shall coordinate and discuss the matter and apprise the RCC of any agreements or pertinent rules changes that may be necessary, in the next meeting.
8. Other Matters	
8.1. DOE Updates a) Schedules of Public Consultation b) Proposals for Promulgation	There are no updates as of date.
8.2. Schedule of Activities	<p><u>Presenter:</u> Ms. Dianne L. De Guzman (Secretariat)</p> <p><u>Action Requested:</u> For information</p> <p><u>Proceedings:</u></p> <p>The Secretariat informed the RCC of the following schedules:</p> <ul style="list-style-type: none"> a) RCC Meetings <ul style="list-style-type: none"> ● 18 Nov 2022 (online) ● 02 Dec 2022 (tentative, face-to-face) ● 20 Jan 2023 (online) b) BRC Meeting <ul style="list-style-type: none"> ● 17 Oct 2022 c) PEM Board Meeting <ul style="list-style-type: none"> ● 26 Oct 2022



MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
 Date & Time : 21 October 2022, 09:00 AM
 Venue : Online via Microsoft Teams
 Page : 18 of 124

Agenda	Agreements / Action Taken / Action Required
	d) WGC Dinner <ul style="list-style-type: none"> • 02 Dec 2022 (tentative, face-to-face) – details of the event to follow
9. Adjournment	The meeting was adjourned at 3:40 PM.

Prepared by:

DIVINE GAYLE C. CRUZ
 Senior Specialist, Rules Review Division
 Market Assessment Group

Reviewed by:

KAREN A. VARQUEZ
 Manager, Rules Review Division
 Market Assessment Group

Noted by:

JOHN MARK S. CATRIZ
 Head, Market Assessment Group



MEETING MINUTES

Subject/Purpose : 202nd Rules Change Committee (Regular) Meeting
Date & Time : 21 October 2022, 09:00 AM
Venue : Online via Microsoft Teams
Page : 19 of 124

Approved by:

CONCEPCION I. TANGLAO
Chairman, Independent

JESUSITO G. MORALLOS
Member, Independent

JOSE RODERICK F. FERNANDO
Member, Independent

CHERRY A. JAVIER
Member, Generation Sector
Aboitiz Power Corp. (APC)

DIXIE ANTHONY R. BANZON
Member, Generation Sector
Masinloc Power Partners Co. Ltd. (MPPCL)

MARK D. HABANA
Member, Generation Sector
Vivant Corporation – Philippines (Vivant)

CARLITO C. CLAUDIO
Member, Generation Sector
Millennium Energy, Inc. / Panasia Energy, Inc.
(MEI/PEI)

VIRGLIO C. FORTICH, JR.
Member, Distribution Sector
Cebu III Electric Cooperative, Inc. (CEBECO III)

RYAN S. MORALES
Member, Distribution Sector
Manila Electric Company (MERALCO)

NELSON M. DELA CRUZ
Member, Distribution Sector
Nueva Ecija II Area 1 Electric Cooperative, Inc.
(NEECO II – Area I)

RICARDO G. GUMALAL
Member, Distribution Sector
Iligan Light and Power, Inc. (ILPI)

LORRETO H. RIVERA
Member, Supply Sector
TeaM (Philippines) Energy Corporation (TPEC)

ISIDRO E. CACHO, JR.
Member, Market Operator
Independent Electricity Market Operator of the
Philippines (IEMOP)

AMBROCIO R. ROSALES
Member, System Operator
National Grid Corporation of the Philippines
(NGCP)

MEETING MINUTES

Annex A 2022 Planning Workshop with Rules Change

Page 20 of 124



2022 PLANNING WORKSHOP WITH RULES CHANGE COMMITTEE (RCC)

21 October 2022, PEMC Office

OVERVIEW OF THE PEMC MANAGEMENT -APPROVED 2022 STRATEGIC PLANNING FRAMEWORK

- Top-to-Bottom Approach with the following considerations:
 - Management Direction
 - Policy and Regulatory Direction
 - Approved PEM Board Governance Plan 2022 -2024
- Strategizing involves workshops with the following:
 - PEMC Departments
 - OCGO, WGC, and Secretariats
- PEM Board approval on the 2023 -2025 PEMC Corporate Strategic Plan by November 2022



MEETING MINUTES

Annex A 2022 Planning Workshop with Rules Change

Page 21 of 124

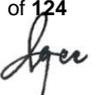
2022-2024 PRIORITIES: BOARD GOVERNANCE PLAN

APPROVED BOARD GOVERNANCE PLAN

2022	2023	2024
<ul style="list-style-type: none"> • Studies related to the Integration of VRE and ESS • Status Report on EWDO implementation and issues encountered • Initial Review of Price Mitigating Measures • Renewable Energy Market implementation • Completion of Reserve Market readiness activities • Approval of the Governance Manual • Review of MO's Performance Standards 	<ul style="list-style-type: none"> • Completion of Reserve Market readiness activities • Review of Price Mitigating Measures • Review of PEMC -IEMOP Operating Agreement • Execution of Protocols with Service Providers 	<ul style="list-style-type: none"> • Reserve Market implementation (based on indicative timeline of MRSC) • Assessment of Enhanced WESM Design and Operations

OBJECTIVE OF PLANNING WORKSHOP WITH THE RCC

- Ensure that RCC's workplan is aligned with and its activities are included in the 2023-2025 PEMC CSP to be approved by the PEM Board
- PEMC to present the overview of the draft 2023-2025 Corporate Strategic Plan (CSP)
- Identify and discuss areas in the draft CSP where RCC's contributions would be most relevant
 - Confirmation of RCC on its involvement in the initially identified activities.
 - What are RCC's Priorities / Major Activities not yet included in the draft CSP? Target Completion?
 - Any foreseen issues / risks in implementing RCC's identified priorities / activities?
 - What are the possible mitigating measures / solutions?
 - Impact in the WESM?



MEETING MINUTES

Annex A 2022 Planning Workshop with Rules Change

Page 22 of 124

OVERVIEW OF THE DRAFT 2023 -2025 PEMC CORPORATE STRATEGIC PLAN

Goals	Related Objectives
G1: Provide a Reliable and Transparent WESM and RE Market (REM) Through Effective and Efficient Governance.	Compliance Monitoring Performance Monitoring Appropriate and effective market design and mechanisms Adequate support to PEM Board and its Committees Accurate and updated market information reports, and documents Stakeholder support and engagement Protocols with oversight agencies, partner institutions, and service providers Responsive Market Rules and Manuals
G2: Support Initiatives and Programs for the Energy Sector through Market Development and Compliance with Policy and Regulatory Directives	RE Market Operation Expanded PEMC Roles and Business Reserve Market operationalization WESM Mindanao implementation Market Studies
G3: Achieve Organizational Excellence and Operational Efficiency.	Market Transactions Fees approvals Efficiency in internal corporate transactions IT systems and infrastructure Internal Business Procedures and Legal Requirements Setting of Corporate Targets and Measures Delivery of Service to Internal and External Clients PEMC's manpower complement

NEXT STEPS AFTER PLANNING WORKSHOPS WITH ALL WGC

- Consultation with OCGO / PEMC Management
- Finalization
- PEM Board Approval

MEETING MINUTES

Annex A 2022 Planning Workshop with Rules Change

Page 23 of 124

ADDITIONAL RCC PRIORITIES/ ACTIVITIES FOR INCLUSION

Priority Area / Activity	Output / Target	Issues / Risks	Mitigating Measures / Solutions
FOR INPUTS OF RCC			
G1: Provide a Reliable and Transparent WESM and RE Market (REM) Through Effective and Efficient Governance.	ISO 37000:2021 - Governance of Organizations Training / Certification	<ul style="list-style-type: none"> Recently published standard, i.e. September 2021(copy of standard is around PhP9,300) Local consultants / training providers are not yet available since this is a relatively new standard 	
G3: Achieve Organizational Excellence and Operational Efficiency			

STATUS OF RULES CHANGE PROPOSALS

	RCC Resolution	Proposal	Status
1	2020-07	Proposal to amend the Guidelines Governing the Constitution of the PEM Board Committees, Issue 3.0	RCC Resolution No. 2020-07 remanded to PEMC on 23 Sep 2021(see updates to RCC Resolution No. 2022-03)
	2022-03	Revision to RCC Resolution Nos. 2020-07, 2020-15 and 2021-16 on the Proposed Amendments to the Guidelines Governing the Constitution of PEM Board Committees, Issue 4.0	Ongoing (In-person public consultations held on 07 Jun 2022 for Visayas Leg and 21 Jun 2022 for Luzon Leg)
2	2021-07	Proposed Amendments to the WESM Manual on Dispute Resolution	<ul style="list-style-type: none"> Partially remanded (DOE Letter dated 31 Mar 2022); DRA study ongoing DOE DC 202206-0021 dated 20 June 2022
3	2021-14	Proposed General Amendments to the WESM Rules and WESM Manuals regarding Market Operator and System Operator Procedures	Completed (DOE DC 202206-0023 dated 20 June 2022)
4	2021-18	Proposed Amendments to the WESM Manual on Registration, Suspension, and DR Registration Criteria and Procedures for General Enhancements to the Application Process of New WESM Members	Completed (DOE DC 202206-0022 dated 20 June 2022)
5	2021-19	Proposed General Amendments to the WESM Manual on Billing and Settlement to Harmonize with ERC Directives on Additional Compensation Process	Completed (DOE DC 202206-0025 dated 20 June 2022)

MEETING MINUTES

Annex A 2022 Planning Workshop with Rules Change

Page 24 of 124

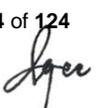
STATUS OF RULES CHANGE PROPOSALS

	RCC Resolution	Proposal	Status
6	2021-21	Proposed Amendments to WESM Rules and Various WESM Manuals on Implementation of Reserve Market	Ongoing (DOE virtual public consultations held on 27 and 28 January 2022)
7	2022-01	Proposed Amendments to Various WESM Manuals on Improvements to Market Resource Modelling and Monitoring	Ongoing (In-person public consultations held on 07 Jun 2022 for Visayas Leg and 21 Jun 2022 for Luzon Leg)
8	2022-04	Proposed Amendments to the WESM Rules, WESM Manual and Retail Manual on Validation Timeline Adjustment in Metering and Billing	Ongoing (In-person public consultations held on 07 Jun 2022 for Visayas Leg and 21 Jun 2022 for Luzon Leg)
9	2022-06	Proposed Amendments to the WESM Rules and WESM Manuals on System Security and Reliability and Dispatch Protocol for the Implementation of the Reserve Market	Ongoing (submitted to DOE on 08 Jun 2022)
10	2022-07	Proposed Amendments for the Implementation of the Green Energy Option Program	Ongoing (submitted to DOE on 08 Jun 2022)



STATUS OF RULES CHANGE PROPOSALS

	RCC Resolution	Proposal	Status
11	2022-08	Proposed Amendments to the WESM Manuals to Include Pricing Error Notice Event as Pricing Condition Category for Claiming Additional Compensation	Ongoing (submitted to DOE on 28 Jul 2022)
12	2022-09	Proposed Amendments to the WESM Manual on Dispatch Protocol regarding Nonsecurity Over-riding Constraints	Remanded by PEM Board; pending RCC decision
13	2022-11	Proposed Amendments to the WESM Manual on Registration, Suspension and Deregistration Criteria and Procedures regarding Penalty Framework on Test and Commissioning	Pending RCC finalization/ endorsement to PEM Board
14	2022-12	Proposed Amendments to the WESM Manual on Billing and Settlement regarding Additional Compensation	Pending RCC finalization/ endorsement to PEM Board
15	---	Proposed Amendments to Retail Rules and Various Retail Manuals on Requiring for Certification of No Outstanding Balance as Switching Requirement for Retail Customers	Pending RCC finalization

MEETING MINUTES

Annex A 2022 Planning Workshop with Rules Change

Page 25 of 124

STATUS OF RULES CHANGE PROPOSALS

	RCC Resolution	Proposal	Status
11	2022-08	Proposed Amendments to the WESM Manuals to Include Pricing Error Notice Event as Pricing Condition Category for Claiming Additional Compensation	Ongoing (submitted to DOE on 28 Jul 2022)
12	2022-09	Proposed Amendments to the WESM Manual on Dispatch Protocol regarding Nonsecurity Over-riding Constraints	Remanded by PEM Board; pending RCC decision
13	2022-11	Proposed Amendments to the WESM Manual on Registration, Suspension and De-registration Criteria and Procedures regarding Penalty Framework on Test and Commissioning	Pending RCC finalization/endorsement to PEM Board
14	2022-12	Proposed Amendments to the WESM Manual on Billing and Settlement regarding Additional Compensation	Pending RCC finalization/endorsement to PEM Board
15	---	Proposed Amendments to Retail Rules and Various Retail Manuals on Requiring for Certification of No Outstanding Balance as Switching Requirement for Retail Customers	Pending RCC finalization



POSSIBLE RULES CHANGE PROPOSALS

Source/Basis	Topic	Description	Proponent (per Sector)
DOE Media Release / DOE DC No. 2022-10-0031 (Oct 2022)	RE Dispatch	Preferential dispatch of all generating units utilizing RE resources in the WESM	MO (per DOE DC)
Discussion during 20 th RCC Meeting (Sep 2022)	Additional Compensation Process	Proposal on the process of motion for reconsideration or appeal to consider other additional documents to support the claim in filing for additional compensation.	Generator/Distribution/ Customer (upto ERC)
SIPC during 20 th RCC Meeting (Sep 2022; Caucus on IEMOP's proposal on Additional Compensation)	Additional Compensation for MRUs	Revisions to allowable recoverable costs through additional compensation for MRUs on top of fuel and variable operating and maintenance costs	
RCC Resolution 202206 (May 2022) & NGCP Letter to ERC (Aug 2022)	Net Operating Margin	Harmonize basis of grid alerts based on SO practice and under the PG SO and WESM Rules. Current Status: NGCP is awaiting ERC's response/guidance	
RCC Resolution 202414 (Oct 2021) & DOE DC No. 2022-06-0023 (Jun 2022)	MRU Report & Dispatch Instruction Report	Proposed deletion of Section 17.5 (MRU Report) was not included in the DOE DC	PEMC/MO
ERC OATS Rules (May 2022) & DOE DC No. 2021-03-0009 (Mar 2021)	Reserve Categories	Subject to ERC directives on the proposed PDM for the reserve market; Harmonize reserve categories in the PDM	PEMC/MO
DOE DC No. 2021-06-0015 (Jun 2021)	WESM Mindanao	Subject to recommendations of the WESM Mindanao Readiness TWG	PEMC/MO

MEETING MINUTES

Annex A 2022 Planning Workshop with Rules Change

Page 26 of 124

ADDITIONAL RULES CHANGE PROPOSALS

Policy / Market Development	Planned Rules Change Submissions	Proponent	Timeline
For RCC inputs	Establish criteria on mechanism of rules change proposals that are for approval of ERC	PEMC	2023
	Inclusion of rate impacts as one of the standard process that will involve changes in the formula(RCM)	PEMC	2023
	Recovery of adjustments (for staggered recovery)	Meralco	2023
	Possible compensation of Must Stop Units(to be included in the Additional Compensation proposal initiated by Generation Sector)	Generation	
	Possible amendments on the billing(application of interest, MQ validation)	PEMC/MO/ Distribution	2024
	Extension of BCQ Declaration	PEMC/Distribution	2023
	Recovery of additional compensation(based on MQ or market transactions)	Meralco/RES	2023

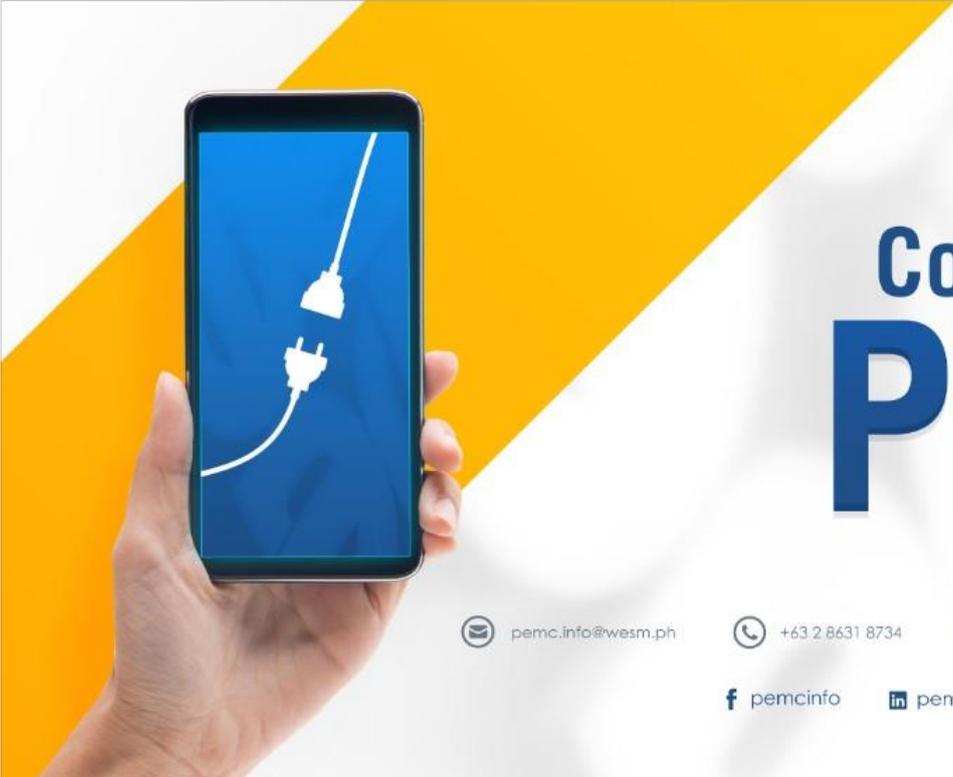
NEXT STEPS

- Inputs for additional proposals until 28 October 2022
- Consultation with OCGO / PEMC Management
- Finalization
- PEM Board Approval

MEETING MINUTES

Annex A 2022 Planning Workshop with Rules Change

Page 27 of 124

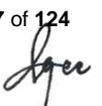


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MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 28 of 124

WESM Rules					
Title	Clause	Original Provision	Proposed Amendment	Rationale	RCC Agreement
Generation Offers and Data	3.5.5.4 3.5.5.5 3.5.5.6 3.5.5.7 3.5.5.8 3.5.5.9 3.5.5.10 3.5.5.11 3.5.5.12 3.5.5.13	<p>xxx</p> <p>3.5.5.4 Each <i>Non-Scheduled Generation Company</i> shall submit a standing nomination of <i>loading levels</i> xxx</p> <p>3.5.5.5 <i>Generation Companies</i> shall provide to the <i>Market Operator</i> and the <i>System Operator</i> standing <i>projected outputs</i> xxx</p> <p>3.5.5.6 A <i>Trading Participant</i> who fails to submit <i>projected outputs</i> for its <i>must dispatch generating unit</i> or <i>priority dispatch generating unit</i> as provided under Clause 3.5.5.5 may be liable for sanctions imposed under Clause 7.2.</p> <p>3.5.5.7 Each <i>Generation Company</i> shall submit check data to be used by the <i>Market Operator</i>, in accordance with the relevant Market Manuals, to assist in determining the validity of any <i>projected output</i> submitted in respect of a <i>must dispatch generating unit</i> or a <i>priority dispatch generating unit</i> under Clause 3.5.5.5.</p> <p>3.5.5.8 <i>Must dispatch generating units</i> shall comply with forecast accuracy standards, in respect of their projected outputs submitted</p>	<p>xxx</p> <p>3.5.5.4 3.5.5.5 Each <i>Non-Scheduled Generation Company</i> shall submit a standing nomination of <i>loading levels</i> xxx</p> <p>3.5.5.5 3.5.5.6 <i>Generation Companies</i> shall provide to the <i>Market Operator</i> and the <i>System Operator</i> standing <i>projected outputs</i> xxx</p> <p>3.5.5.6 3.5.5.7 A <i>Trading Participant</i> who fails to submit <i>projected outputs</i> for its <i>must dispatch generating unit</i> or <i>priority dispatch generating unit</i> as provided under Clause 3.5.5.56 may be liable for sanctions imposed under Clause 7.2.</p> <p>3.5.5.7 3.5.5.8 Each <i>Generation Company</i> shall submit check data to be used by the <i>Market Operator</i>, in accordance with the relevant Market Manuals, to assist in determining the validity of any <i>projected output</i> submitted in respect of a <i>must dispatch generating unit</i> or a <i>priority dispatch generating unit</i> under Clause 3.5.5.56.</p> <p>3.5.5.8 3.5.5.9 <i>Must dispatch generating units</i> shall comply with forecast accuracy standards, in respect of their projected outputs submitted under Clause 3.5.5.56, consistent with the <i>Grid Code</i>.</p>	To correct redundant numbering and reference WESM Rules clauses.	Adopt

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 29 of 124

WESM Rules					
Title	Clause	Original Provision	Proposed Amendment	Rationale	RCC Agreement
		<p>under Clause 3.5.5.5, consistent with the <i>Grid Code</i>.</p> <p>3.5.5.9 The <i>Enforcement and Compliance Office</i> shall evaluate annually the forecast accuracy standards complied with by <i>must dispatch generating units</i> in accordance with Clause 3.5.5.8.</p> <p>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.</p> <p>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 xxx</p> <p>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> xxx</p>	<p>3.5.5.9 3.5.5.10 The <i>Enforcement and Compliance Office</i> shall evaluate annually the forecast accuracy standards complied with by <i>must dispatch generating units</i> in accordance with Clause 3.5.5.89.</p> <p>3.5.5.10 3.5.5.11 A <i>Trading Participant</i> who fails to meet the requisite forecast accuracy standards set out in accordance with Clause 3.5.5.89 in respect of <i>projected outputs</i> for a <i>must dispatch generating unit</i> submitted under Clause 3.5.5.56 may be liable for sanctions imposed under Clause 7.2.</p> <p>3.5.5.11 3.5.5.12 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 xxx</p> <p>3.5.5.12 3.5.5.13 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> xxx</p>		
Generation Offers and Data	3.5.5.14 (New)	(None)	<u>3.5.5.14 Each Generation Company that has secured a Final Certificate of Approval to Connect for completing the conduct of test and</u>	To emphasize that a Generation Company with FCATC but still awaiting COC	Adopt

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 30 of 124

WESM Rules					
Title	Clause	Original Provision	Proposed Amendment	Rationale	RCC Agreement
			<p><u>commissioning but with pending issuance of Certificate of Compliance from the ERC shall submit, as applicable:</u></p> <p><u>a) standing nomination of loading levels for each of its scheduled generating units, battery energy storage systems and pumped-storage units; or</u></p> <p><u>b) projected outputs in respect of its must dispatch generating units and priority dispatch generating units</u></p> <p><u>The Generation Company shall submit its nomination of loading levels or projected outputs for each dispatch interval in each trading day of the week in accordance with the timetable. The standing nomination of loading levels and projected outputs shall apply until revised or updated by the Generation Company.</u></p>	<p>for its generating unit(s) is obligated to submit nominations of loading levels or projected outputs to be included in scheduling and dispatch, instead of through imposition non-security overriding constraints if under test and commissioning.</p>	
Generation Offers and Data	3.5.5.15 (New)	(None)	<p><u>3.5.5.15 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</u></p>	<ul style="list-style-type: none"> To reflect DOE DC 2022-05-0015 as regards must dispatch generating units' obligation to comply with forecast accuracy standards 	Adopt

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 31 of 124

WESM Rules					
Title	Clause	Original Provision	Proposed Amendment	Rationale	RCC Agreement
			<u>with the forecast accuracy standards in respect of its projected outputs which shall be evaluated by the Enforcement and Compliance Office, in accordance with Clauses 3.5.5.8 to 3.5.5.12.</u>	<ul style="list-style-type: none"> To include such must dispatch generating units in the ECO’s monitoring and evaluation of the compliance with the forecast accuracy standards 	
Dispatched Trading Participants	3.8.4.5 (New)	(None)	xxx <u>3.8.4.5 A generating unit 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 shall likewise comply with the obligations, as applicable, of dispatched Trading Participants prescribed in Clause 3.8.4.</u>	To reflect DOE DC 2022-05-0015 as regards obligation to comply with dispatch schedules, dispatch instructions by the System Operator, dispatch conformance standards and forecast accuracy standards.	Adopt
Sanctions of Trading Participants	3.8.6	Any <i>Trading Participant</i> that (a) does not comply with the <i>dispatch conformance standards</i> or (b) consistently fails to use its reasonable endeavors to comply with the <i>dispatch instructions</i> issued by the <i>System Operator</i> under Clauses 3.8.3, 6.3 and 6.5, may be liable of a sanction imposed under Clause 7.2.	Any <i>Trading Participant</i> , <u>including those 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</u> , that (a) does not comply with the <i>dispatch conformance standards</i> or (b) consistently fails to use its reasonable endeavors to comply with the <i>dispatch instructions</i> issued by the <i>System Operator</i> under Clauses 3.8.3, 6.3 and 6.5, <u>may shall</u> be liable <u>of a to</u> <u>sanction</u> s imposed under Clause 7.2.	To reflect DOE DC 2022-05-0015 as regards compliance with dispatch conformance standards.	Adopt, as revised for clarity and enhancement

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 32 of 124

WESM Manual on Registration, Suspension and De-registration Criteria and Procedures					
Title	Section	Original Provision	Proposed Amendment	Rationale	RCC Agreements
Assessment of Applications	2.5.6.1 (h) Submission and Preliminary Assessment of Applications	2.5.6.1 xxx h) Participant Interface Access. During the <i>Test and Commissioning</i> Registration phase, the <i>Applicant</i> may subscribe to and allow the <i>Market Operator</i> to apply or install a method employing encryption in its computers to provide secure access to the <i>Market Management System</i> . The <i>Applicant</i> shall have read-only access to its facility during the <i>Test and Commissioning</i> phase to enable the <i>Trading Participant</i> to view its generating unit's schedules. Meanwhile, full access to its <i>facility</i> will only be enabled by the <i>Market Operator</i> no later than eight (8) calendar days from approval of the <i>Applicant's</i> Commercial Operations registration.	2.5.6.1 xxx h) Participant Interface Access. During the <i>Test and Commissioning</i> Registration phase, the <i>Applicant</i> may subscribe to and allow the <i>Market Operator</i> to apply or install a method employing encryption in its computers to provide secure access to the <i>Market Management System</i> . The <i>Applicant</i> shall have read-only access to the <u>Market Management System</u> to for its <i>facility</i> during the <i>Test and Commissioning</i> phase to enable the <i>Trading Participant</i> to view its generating unit's schedules. Meanwhile, full access to for its <i>facility</i> will only be enabled by the <i>Market Operator</i> no later than eight (8) calendar days from approval of the <i>Applicant's</i> Commercial Operations registration, or from the date of effectivity of final Certificate of Approval to Connect if the ERC is yet to issue the Certificate of Compliance.	To align with DOE DC2022-05-0015	Adopt

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 33 of 124

WESM Manual on Registration, Suspension and De-registration Criteria and Procedures					
Title	Section	Original Provision	Proposed Amendment	Rationale	RCC Agreements
Other Requirements for Approved Applications	2.5.7.3 (a) Guidelines for Test and Commissioning Registration	<p>a) The generating unit of the <i>WESM Member</i> shall be allowed to declare bilateral contract quantities and be entitled to WESM payments for its generated output only within the <i>test and commissioning</i> period indicated in the valid Provisional Certificate of Approval to Connect issued by the <i>Network Service Provider</i> or upon completion of the conduct of <i>test and commissioning</i>, if completed earlier. Generation beyond the authorized <i>test and commissioning</i> period shall not be allowed to be declared as a bilateral contract quantity and shall not be entitled to WESM payments. Any net surplus as a result of injected energy from unauthorized <i>test and commissioning</i> activity will be treated in accordance with <i>WESM Rules Clause 3.13.12</i>. However, the <i>WESM Member</i> shall still be charged for all withdrawals from the grid for the conduct of its <i>test and commissioning</i> activities.</p> <p>xxx</p>	<p>a) The generating unit of the <i>WESM Member</i> shall be allowed to declare bilateral contract quantities for its <u>generating unit</u> and be entitled to WESM payments for its generated output only:</p> <p><u>(i)</u> within the <i>test and commissioning</i> period indicated in the valid Provisional Certificate of Approval to Connect issued by the <i>Network Service Provider</i> or upon <u>until</u> completion of the conduct of <i>test and commissioning</i>, if completed earlier; <u>or</u></p> <p><u>(ii) when the <i>WESM Member</i> is issued a Final Certificate of Approval to Connect by the <i>Network Service Provider</i> pending the issuance of the Certificate of Compliance by the Energy Regulatory Commission, unless the latter issues an Order for the immediate disconnection of the <i>generating unit</i> from the Grid.</u></p>	<ul style="list-style-type: none"> For (a)(ii): To align with DOE DC2022-05-0015 	

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 34 of 124

WESM Manual on Registration, Suspension and De-registration Criteria and Procedures					
Title	Section	Original Provision	Proposed Amendment	Rationale	RCC Agreements
			<p><u>In the absence of the requirement or condition set forth in this section, except for its own station use,</u> Generation beyond the authorized test and commissioning period to operate shall not be allowed. to Neither shall such generation be declared as a bilateral contract quantity and nor shall it be entitled to WESM payments. Any net surplus as a result of injected energy from unauthorized <i>test and commissioning</i> activity or operation will be treated in accordance with <i>WESM Rules</i> Clause 3.13.4216. However, the <i>WESM Member</i> shall still be charged for all withdrawals from the grid for the conduct of its test and commissioning activities or <u>distribution network, as the case may be.</u></p>	<ul style="list-style-type: none"> To explicitly state that generation for a generation facility's own station use is allowed beyond its authorized period for test and commissioning To make it a statement of obligation or a clear prohibition first, i.e., "...generation beyond the authorized (test and commissioning) period to operate shall not be allowed"; followed by a consequence, i.e., no BCQ declaration and no WESM settlement. Deletion of original last phrase: to cover instances where the withdrawal (or injection) of energy happens <i>after</i> the test and 	

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 35 of 124

WESM Manual on Registration, Suspension and De-registration Criteria and Procedures					
Title	Section	Original Provision	Proposed Amendment	Rationale	RCC Agreements
				commissioning activities or while awaiting the requirements for commercial operations • Addition of last phrase: to align with Section 4.3.3 (b) of DOE DC 2021-06-0013, which recognizes energy withdrawals not only from the grid but also from the distribution network	
Other Requirements for Approved Applications	2.5.7.3 Guidelines for Test and Commissioning Registration	(None)	<i>(insert new provision)</i> Guidelines for Test and Commissioning Registration a) xxx <u>b) Dispatch of a generating unit to which Final Certificate of Approval to Connect has been released but with pending issuance of COC shall be in accordance with the following:</u> <u>i) For its must dispatch generating units, the Generation Company</u>	To align with Section 4.4.5 of DOE DC2022-05-0015	Adopt, as revised for clarity

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 36 of 124

WESM Manual on Registration, Suspension and De-registration Criteria and Procedures					
Title	Section	Original Provision	Proposed Amendment	Rationale	RCC Agreements
			<p><u>shall submit <i>projected output</i> to the <i>Market Operator</i> and comply with the applicable forecast accuracy standards; and</u></p> <p><u>ii) For <i>scheduled generating units</i>, <i>priority dispatch generating unit</i>, and <i>energy storage systems</i>, the <i>Generation Company</i> shall submit to the <i>Market Operator</i> its day-ahead nomination and shall comply with the applicable <i>dispatch conformance standards</i>.</u></p> <p><u><i>Projected output</i> and <i>day-ahead nominations</i> shall be submitted through the <i>Market Operator's Market Participant Interface</i>, which, as necessary, may be revised by the <i>Generation Company</i> near real-time.</u></p> <p><u>Compliance of <i>generating units</i> referred in these guidelines with the <i>forecast accuracy standards</i> and <i>dispatch conformance standards</i>, as applicable, shall be monitored by the <i>Enforcement and Compliance Office</i></u></p>		

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 37 of 124

WESM Manual on Registration, Suspension and De-registration Criteria and Procedures					
Title	Section	Original Provision	Proposed Amendment	Rationale	RCC Agreements
			<u>and non-compliance shall be subject to imposition of financial penalties.</u>		
Other Requirements for Approved Applications	2.5.7.3 Guidelines for Test and Commissioning Registration	b) xxx c) xxx d) xxx e) xxx f) xxx g) xxx	b) c) xxx e) d) xxx e) e) xxx e) f) xxx f) g) xxx	Re-numbering due to insertion of proposed new provision, i.e., Section 5.4.7.3(b)	
Other Requirements for Approved Applications	2.5.7.3 (g) Guidelines for Test and Commissioning Registration	xxx g) The <i>WESM Member</i> of a generating unit shall submit to the <i>Market Operator</i> an application for Commercial Operations Registration within three (3) working days from receipt of its Certificate of Compliance or Provisional Authority to Operate (PAO).	xxx g) h) The <i>WESM Member of a generating unit</i> shall submit to the <i>Market Operator</i> an application for Commercial Operations Registration <u>of its generating unit</u> within three (3) <i>working days</i> from <u>date of</u> receipt of its Certificate of Compliance or Provisional Authority to Operate (PAO) <u>from the Energy Regulatory Commission, 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.</u>	<ul style="list-style-type: none"> To align with Section 6.2 of the DOE Department Circular No. DC2019-02-0003 (Providing for the Framework Governing the Operations of Embedded Generators), which states that embedded generators that do not reach the prescribed threshold level per Sec. 6.1.1 and those that do not intend to sell outside its host DU shall register in the WESM only on a voluntary basis. 	

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 38 of 124

WESM Manual on Registration, Suspension and De-registration Criteria and Procedures					
Title	Section	Original Provision	Proposed Amendment	Rationale	RCC Agreements
			<u>Furthermore, the WESM Member shall likewise furnish the System Operator of the said submission. The said notification shall include the date of effectivity of the Certificate of Compliance or the Provisional Authority to Operate, and the estimated or target date of commercial operation of the WESM Member.</u>	<ul style="list-style-type: none"> To specify the responsibility of WESM Members to notify the System Operator of their application to the Market Operator for Commercial Operations with corresponding target date. 	
Other Requirements for Approved Applications	2.5.7.3 (h) Guidelines for Test and Commissioning Registration	[None]	<p>[New]</p> <p><u>i) The Market Operator shall submit a bi-monthly report on the status of generating units on Test and Commissioning to the Enforcement and Compliance Office indicating information such as, but not limited to:</u></p> <p><u>(i) whether a WESM Member has been duly notified of the impending expiration of its Provisional Certificate of Authority to Connect;</u></p> <p><u>(ii) Whether a WESM Member is given a Final Certificate of</u></p>	<p>To set a trigger for investigation wherein:</p> <p>a. The concerned WESM Member is timely advised of its obligation to comply with the Manual</p> <p>b. Despite the said notification, reminder, or advice, the WESM Member failed to comply with relevant rules/Manuals</p> <p>The intention of this provision is to exhaust the possible actions before one is investigated and/or</p>	Adopt, with IEMOP's agreement of "monthly" submission

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 39 of 124

WESM Manual on Registration, Suspension and De-registration Criteria and Procedures					
Title	Section	Original Provision	Proposed Amendment	Rationale	RCC Agreements
			<p><u>Authority to Connect, Certificate of Compliance, or the Provisional Authority to Operate, including the effectivity date/s, if such is known to the Market Operator; and</u></p> <p><u>(iii) any relevant information affecting the obligations set forth in paragraphs (a), (e)(d) and (g)(h) of this Section for its appropriate enforcement action.</u></p> <p><u>An investigation may likewise be initiated <i>motu proprio</i> by the Enforcement and Compliance Office as may be authorized under Section 7.2.1 of the Enforcement and Compliance Manual.</u></p>	<p>penalized, considering that the entity involved is not in full commercial operation yet (although a registered WESM Member already).</p> <p>For those information that are made known or readily available to PEMC/ECO, the ECO may investigate <i>motu proprio</i>, as allowed under the EC Manual.</p>	

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 40 of 124

WESM Manual on Dispatch Protocol					
Title	Clause	Original Provision	Proposed Amendment	Rationale	RCC Agreement
Definitions	2.1.2 (dd)	Self-scheduled nomination. Nominations of <i>loading levels</i> by <i>Non-Scheduled Generation Companies</i> and <i>projected outputs</i> of <i>Generation Companies</i> with <i>must dispatch generating units</i> and <i>priority dispatch generating units</i> .	Self-scheduled nomination. Nominations of <i>loading levels</i> by <i>Non-Scheduled Generation Companies</i> , and <i>projected outputs</i> of <i>Generation Companies</i> with <i>must dispatch generating units</i> and <i>priority dispatch generating units</i> , <u>and loading levels or projected outputs of generating units, as applicable, that has been issued with a Final Certificate of Approval to Connect for completing conduct of test and commissioning but with pending issuance of COC by the ERC.</u>	To reflect DOE DC 2022-05-0015 regarding relevant Generation Companies' requirement to nominate loading levels or projected outputs to be included in scheduling and dispatch, instead of through imposition non-security overriding constraints if under test and commissioning	Adopt
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. <i>Real-time market offers</i> for <i>scheduled generating units</i> of <i>Scheduled Generation Companies</i> ; b. <i>Operating reserves offers</i> for certified <i>ancillary service providers</i> ; c. <i>Demand bids</i> from <i>customer Trading Participants</i> ; and d. <i>Self-scheduled nominations</i> i. <i>Schedule of loading levels</i> (i.e. <i>energy quantities</i> only) for <i>non-scheduled generating units</i> of <i>non-scheduled Generation Companies</i> ; and	The <i>self-scheduled nominations, bids, and offers</i> that can be submitted in the <i>WESM</i> are as follows: a. <i>Real-time market offers</i> for <i>scheduled generating units</i> of <i>Scheduled Generation Companies</i> ; b. <i>Operating reserves offers</i> for certified <i>ancillary service providers</i> ; c. <i>Demand bids</i> from <i>customer Trading Participants</i> ; and d. <i>Self-scheduled nominations</i> i. <i>Schedule of loading levels</i> (i.e. <i>energy quantities</i> only) for <i>non-scheduled generating units</i> of <i>non-scheduled Generation Companies</i> ; and	To reflect DOE DC 2022-05-0015 regarding relevant Generation Companies' requirement to nominate loading levels or projected outputs to be included in scheduling and dispatch, instead of through imposition non-security overriding constraints if under test and commissioning	Adopt

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 41 of 124

WESM Manual on Dispatch Protocol					
Title	Clause	Original Provision	Proposed Amendment	Rationale	RCC Agreement
		ii. <i>Projected output</i> (i.e. energy quantities only) of <i>Generation Companies</i> with <i>must dispatch generating units</i> and <i>priority dispatch generating units</i>	ii. <i>Projected output</i> (i.e. energy quantities only) of <i>Generation Companies</i> with <i>must dispatch generating units</i> and <i>priority dispatch generating units</i> ; <u>and</u> iii. <u>Schedule of loading levels or projected output (i.e., energy quantities only) of generating units, as applicable, that has been issued with a Final Certificate of Approval to Connect for completing the conduct of test and commissioning but with pending issuance of COC by the ERC</u>		
Dispatch Implementation Responsibilities	11.3.4 (New)	(None)	<u>11.3.4 A Trading Participant that has been released with 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 generating units shall likewise comply with dispatch schedules issued by the Market Operator, the dispatch instructions issued by the System Operator to their facilities operating on AGC mode, and the re-dispatch instructions issued to them by the System Operator, if any.</u>	To reflect DOE DC 2022-05-0015 and emphasize the relevant Generation Companies' obligation to comply with the dispatch conformance standards	Adopt

MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 42 of 124

WESM Manual on Dispatch Protocol					
Title	Clause	Original Provision	Proposed Amendment	Rationale	RCC Agreement
Dispatch Implementation Dispatch of Must and Priority Dispatch Generating Units	11.5.1	<i>A must dispatch generating unit shall generate at its maximum available output at all times, unless the Market Operator or System Operator has instructed the generating unit to restrict output.</i>	<i>A must dispatch generating unit shall generate at its maximum available output at all times, unless the Market Operator or System Operator has instructed the generating unit to restrict output. <u>This shall likewise apply to must dispatch generating units that has secured 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.</u></i>		
Dispatch Compliance Background	12.1.5 (New)	(None)	<u>Scheduled generating units, battery energy storage systems, pumped storage units, must dispatch generating units and priority dispatch generating units that has 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 shall likewise operate in accordance with Sections 12.1.1 and 12.1.3, as applicable, and as prescribed in Chapter 3 of the WESM Rules.</u>	To reflect DOE DC 2022-05-0015 and emphasize the relevant Generation Companies' obligation to generate according to dispatch schedules or its maximum available capacity, as applicable, and with the dispatch conformance standards	Adopt
Dispatch Compliance	12.4.1 (a)	<i>All scheduled generating units and priority dispatch generating units shall comply with their respective dispatch schedules. In complying with their dispatch schedules, said generating units shall generate in accordance with dispatch conformance standards</i>	<i>All scheduled generating units and priority dispatch generating units comply with their respective dispatch schedules. <u>This obligation shall also apply to scheduled generating units and priority dispatch generating units with Final Certificate of Approval to Connect after</u></i>	To reflect DOE DC 2022-05-0015 and emphasize the relevant Generation Companies' obligation to generate according to dispatch schedules or its	Adopt

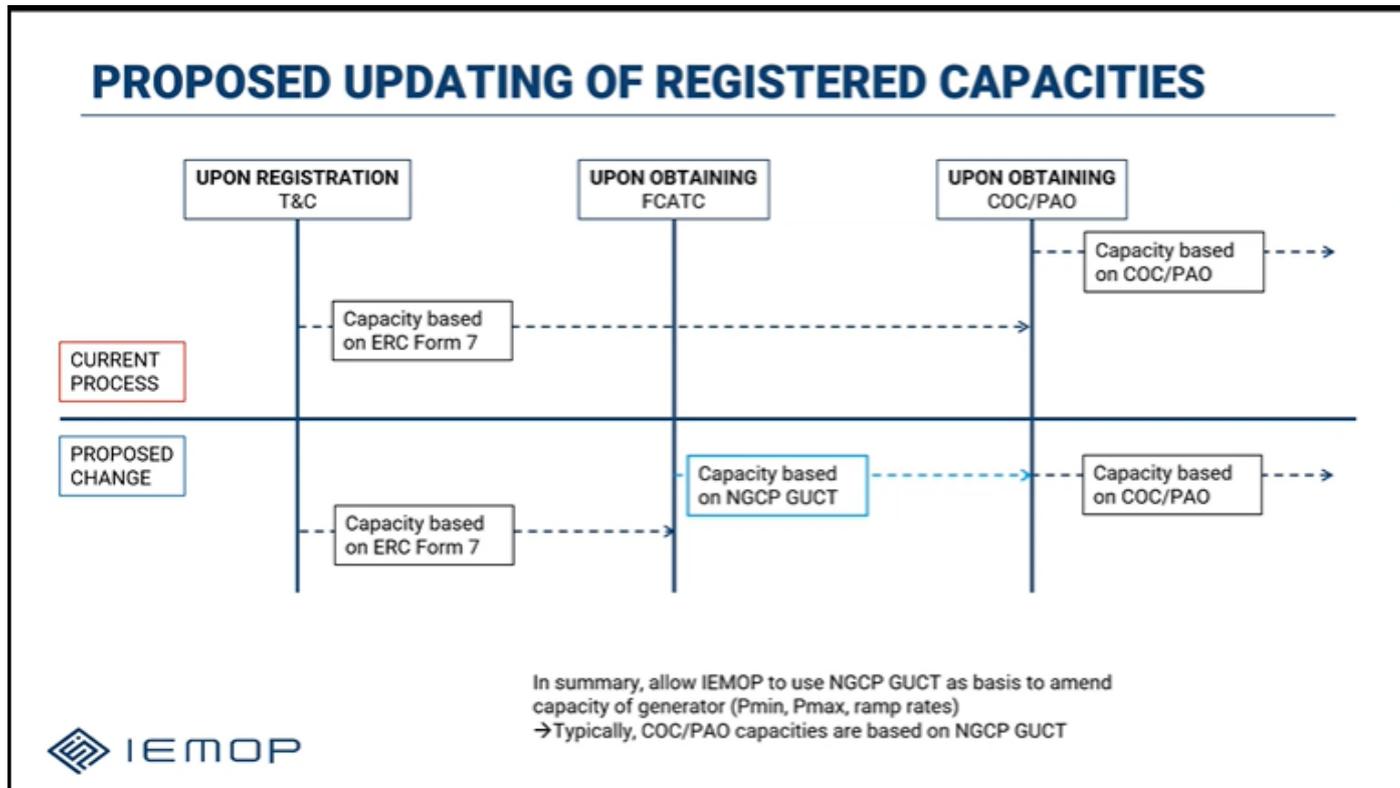
MEETING MINUTES

Annex B Revised matrix of proposed amendments regarding Proposal on Penalty Framework for Test & Commissioning
 Page 43 of 124

WESM Manual on Dispatch Protocol					
Title	Clause	Original Provision	Proposed Amendment	Rationale	RCC Agreement
Compliance by the <i>Scheduled Generating Units</i> and <i>Priority Dispatch Generating Units</i> .		prescribed in Section 12.5 of this 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> .	<u>completing the conduct of test and commissioning but with pending issuance of Certificate of Compliance from the ERC.</u> In complying with their <i>dispatch schedules</i> , said <i>generating units</i> shall generate in accordance with <i>dispatch conformance standards</i> prescribed in Section 12.5 of this 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> .	maximum available capacity, as applicable, and with the dispatch conformance standards	
Dispatch Compliance Compliance by the <i>Must Dispatch Generating units</i>	12.4.2 (a)	A <i>must dispatch generating unit</i> shall generate at its <i>maximum available output</i> at all times, unless it has been instructed to restrict its output by the <i>Market Operator</i> or <i>System Operator</i> .	A <i>must dispatch generating unit</i> shall generate at its <i>maximum available output</i> at all times, unless it has been instructed to restrict its output by the <i>Market Operator</i> or <i>System Operator</i> . <u>This obligation shall also apply to must dispatch generating units with Final Certificate of Approval to Connect after completing the conduct of test and commissioning but with pending issuance of Certificate of Compliance from the ERC.</u>	To reflect DOE DC 2022-05-0015 and emphasize the relevant Generation Companies' obligation to generate according to dispatch schedules or its maximum available capacity	Adopt

MEETING MINUTES

Annex C Proposed Updating of Registered Capacities
 Page 44 of 124



MEETING MINUTES

Annex D Simulation on Use of MQ for Additional Compensation During Market Intervention/Suspension
Page 45 of 124

Simulation on Use of MQ for Additional Compensation During Market Intervention/Suspension

19 October 2022



Background

Current Determination of Additional Compensation Quantity

Based on WESM Billing and Settlement Manual Section 10.3

Compensation Type	Pre-Condition on Determining AddCompQty	Formula to be Used
Designation as MustRun Unit	None	ACQ = GESQ - BCQ - ASIE
Due To Administered Price Due To Secondary Price Cap Due To PSM for Congestion Designation as Constraint Generation (MOT)	If GESQ <= (SG + Allowable Upward Deviation)	ACQ = GESQ - BCQ - ASIE
	If GESQ > (SG + Allowable Upward Deviation)	ACQ = SG - BCQ - ASIE

Where:

ACQ refers to the Additional Compensation Quantity
GESQ refers to the Gross Energy Settlement Quantity (or metered quantity)
BCQ refers to the sum of Bilateral Contract Quantity
ASIE refers to the Ancillary Service Incidental Energy
SG refers to Scheduled Generation



During Use of Administered Prices (i.e., Market Intervention or Market Suspension)

- Scheduled Generation is computed based on the most recent dispatch target
 - ✓ **Dispatch Target is based on RTD schedule from the Market Operator (MMS), or a dispatch instruction from the System Operator**

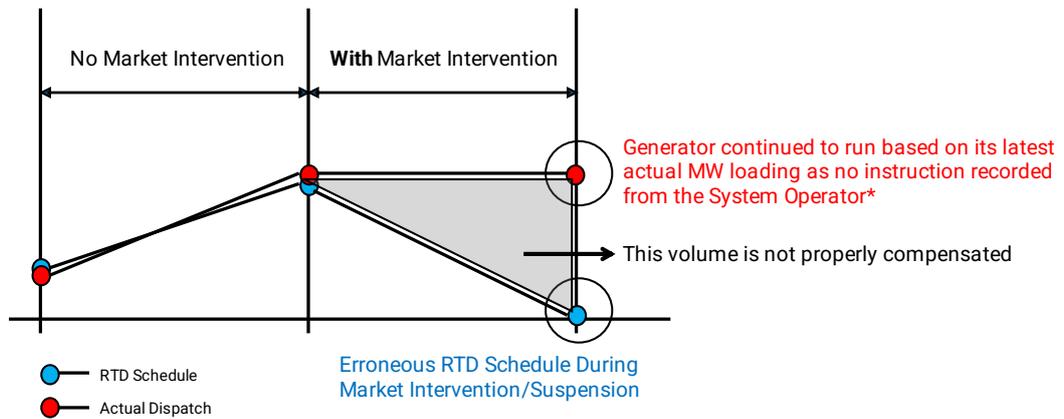


MEETING MINUTES

Annex D Simulation on Use of MQ for Additional Compensation During Market Intervention/Suspension
 Page 46 of 124

Background

Issue During Market Intervention / Suspension



*SO expects all generators to continue to run based on latest actual MW loading during MI or MS. SO will only issue dispatch instructions to select generators to ensure continued balance of supply and demand

Simulation

- ❑ RCC requested IEMOP to simulate impact of IEMOP proposal where
 - The objective is to avoid use of RTD during MI or MS, hence, AddComp Quantity shall be
 - SO Dispatch Instruction, if there is any, or
 - GESQ (or MQ)
- ❑ Generally, the AddComp Quantity is expected to increase, thus, the Additional Compensation shall increase
- ❑ The following formula was used to compute for the expected increase in WESM rate (in P/kWh) should the proposal be implemented

$$\text{Rate Increase for Each Month} = \frac{\sum_{i=1}^n \sum_{k=1}^o (\text{New AddComp Qty}_{k,i} - \text{Old AddComp Qty}_{k,i}) \times (\text{Approved Rate}_{k,i} - \text{FEDP}_{k,i})}{\text{Total Spot Quantity for the Month}}$$

Where:

New AddComp Qty_{k,i} refers to the New Additional Compensation Quantity (based on proposal) of generator k at dispatch interval i
Old AddComp Qty_{k,i} refers to the Old Additional Compensation Quantity (status quo) of generator k at dispatch interval i

Approved Rate_{k,i} refers to the approved rate for additional compensation of generator k at dispatch interval i

FEDP_{k,i} refers to the WESM final energy dispatch price of generator k at dispatch interval i

Total Spot Quantity for the Month refers to the total kWh spot quantity recorded for the month

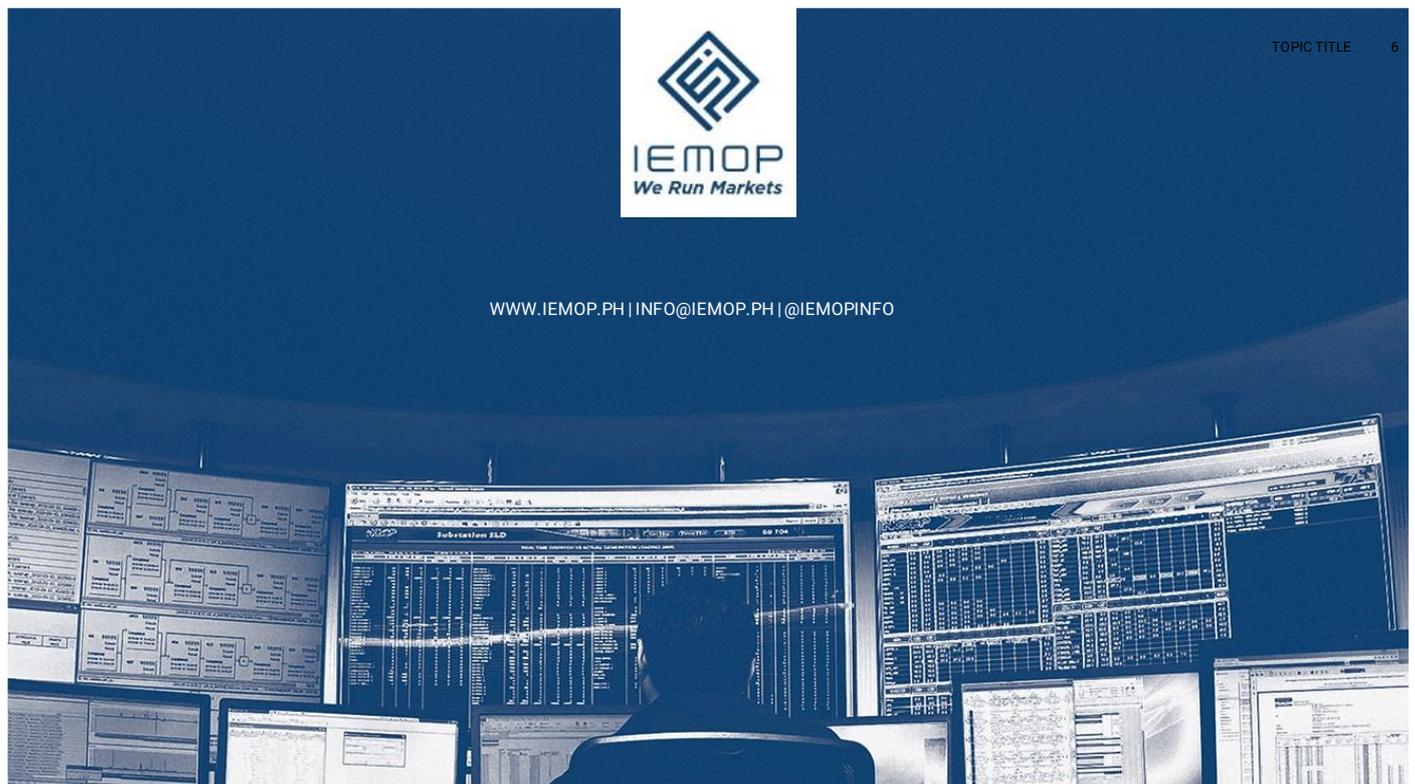


MEETING MINUTES

Annex D Simulation on Use of MQ for Additional Compensation During Market Intervention/Suspension
 Page 47 of 124

Simulation Results

Billing Month	No. of 5-minute Intervals with AP		No. of Generator Claims for Each Affected 5-minute Interval with AP		Expected WESM Rate Increase Due to Proposal (Luzon-Visayas), P/kWh*	Remarks
	Luzon	Visayas	Luzon	Visayas		
Jul-2021	1	1	7	--	None	MQ <= SchedGen, hence, AddCompQty = MQ
Aug-2021	4	83	1	210	0.000483	
Sep-2021	1	4	--	--	None	No Claims made for AP
Oct-2021	--	203	--	538	0.000188	
Nov-2021	--	--	--	--	None	No Market Intervention/Suspension
Dec-2021	19	2644	11	3583	0.003356	
Jan-2022	0	8928	--	10097	0.028906	
Feb-2022	1	4573	--	1	None	Few Claims
Mar-2022	--	--	--	--	None	No Market Intervention/Suspension
Apr-2022	4	17	12	16	None	MQ <= SchedGen, hence, AddComp Qty = MQ
May-2022	19	19	--	22	None	MQ <= SchedGen, hence, AddComp Qty = MQ
Jun-2022	13	13	13	66	None	MQ <= SchedGen, hence, AddCompQty = MQ
Jul-2022	4	173	--	1375	0.001417	



MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 48 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>PEMC:</p> <p>For RCC to note that these are additional amendments of RCC Resolution 2022-07 (approved by PEM Board Resolution 2022-48-06), which is still with the DOE, for approval.</p>			
					<p>MERALCO:</p> <p>We would like to request clarification on the following statement from the proponent:</p> <p><i>“With these rule change recommendations, we hope to mitigate unreasonable withholding of Retail Customers’ ability to switch to new Suppliers by enabling prospective Suppliers to initiate switch requests while providing Network Service Providers/incumbent Suppliers the</i></p>		<p>The delay being addressed by the rules change proposal is due to the inability of the Retail Customers to switch because it cannot comply with the submission of a certification of no outstanding obligation. The rules change proposal is in response to several feedbacks from Retail Customers on this requirement and provides an alternative compliance which preserves the rights of the parties.</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 49 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p><i>opportunity to contest switching of Customers with unpaid balances in a timely manner."</i></p> <p>May if we ask there is a study on the root cause of the delay cited in this proposal? An in-depth assessment of the current situation will allow stakeholders to see if the proposed rules change properly addresses the causes of the delays. If the delay is due to the customer having unsettled/outstanding obligations with the Network Service Provider and/or Incumbent Supplier, then the proper solution is to settle the obligation—not rules change.</p> <p>Also, the timetable for the issuance of the Certification of No Outstanding Obligation is already provided in the Retail Manual for Market Transaction Procedures (Section 3.1.1). If the</p>		<p>The proposal does not intend to deviate from ERC Resolution No. 9, Series of 2018 ("Supplemental Switching Rules") and ERC Resolution No. 8, Series of 2021 ("GEOP Rules") but to supplement its implementation through alternative mechanisms in addition to the existing procedure for fulfilling condition of no outstanding balance. This is to recognize both contestable customer's right to choose their suppliers and incumbent RES's/DU/NSP right to recover the due costs for the delivery of electricity. While the aforementioned</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 50 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>certification is indeed being unreasonably withheld, the affected Retail Customer may elevate the matter to ERC.</p> <p>We respectfully point out that the Retail Rules should be interpreted and read alongside the relevant ERC issuances, such as ERC Resolution No. 9, Series of 2018 ("Supplemental Switching Rules") and ERC Resolution No. 8, Series of 2021 ("GEOP Rules"), which provide the legal framework for the implementation of Retail Competition and Open Access (RCOA) and Green Energy Option Program (GEOP). Thus, any proposed amendment should be consistent and aligned with the ERC rules. In particular, ERC's Supplemental Switching Rules provide the procedure for switching and billing of contestable customers.</p>		<p>ERC issuances provide, in general terms, that no switch shall occur if the Retail Customer still has outstanding balance, the specific mechanism to ensure compliance with this requirement is contained in the Retail Rules and Manuals --- which is the submission of a certification signed by the incumbent Supplier or Network Service Provider (NSP) seven working days prior to the proposed switch date. This existing mechanism means that the only recourse a Retail Customer can avail is to wait for the incumbent Supplier or NSP to issue the said certification before it can submit a switch request,</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 51 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>Section 1(a) of the said ERC Supplemental Switching Rules unequivocally states that, <u>"No contestable customer shall be allowed to Switch or be supplied by a new RES or SOLR should it have an outstanding balance with its Network Service Provider, in case of initial switch, or its incumbent RES. Whether under dispute or not, the Contestable Customer shall be required to settle its outstanding balance prior to Switching."</u></p> <p>It is clear that the contestable customer is expected to fully satisfy its obligations to the Network Service Provider before it may be allowed to switch <u>whether the outstanding obligation is disputed by the contestable customer or not.</u></p> <p>Thus, the proposed amendments pose the following major concerns:</p>		<p>through its prospective Supplier. By providing a definite timeline for the incumbent Supplier or NSP to act on requests for issuance of such certification, the Retail Customer is provided assurance that it is not being unreasonably withheld from switching to a new Supplier. It is not IEMOP's intention to bypass the no outstanding obligation requirement, but to allow timely switching of Retail Customers while providing alternative means to fulfill the no outstanding obligation requirement in a manner that is still mutually acceptable to the concerned parties (i.e. Retail</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 52 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<ol style="list-style-type: none"> 1. It is not consistent with Section 1(a) of the Supplemental Switching Rules. 2. The mere execution of a valid settlement agreement as fulfillment for the condition under Clause 3.2.1.3(c) of the Retail Rules defeats the purpose and intention for such clause. Clause 3.2.1.3(c) is clear that the contestable customer should have no financial obligations to the NSP. A valid settlement agreement cannot be considered as full satisfaction of a contestable customer's outstanding balance. 3. If required as an alternative, the NSP/DU shall be placed at the mercy of the contestable customer's 		<p>Customers and incumbent Suppliers or NSPs). Hence, the incumbent Supplier or NSP's concurrence is required in both proposed alternatives.</p> <p>Subject to further inputs from representatives from Suppliers and Retail Customers, it is proposed that the execution of settlement agreement may be considered as an acceptable mechanism for resolving financial obligations between the incumbent Supplier/NSPs and Retail Customers as it:</p> <p>a) confirms the Retail Customer's commitment to settle any unpaid amounts;</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 53 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>willingness to satisfy the terms and conditions of the settlement agreement. It is clear from the ERC Supplemental Switching Rules that the intention is for the contestable customer to fully pay its obligations. In contrast, the proposed amendment now imposes an additional responsibility and lookout on the part of the DU/NSP to ensure that the contestable customer is able to settle its obligations within the terms and conditions of the settlement agreement.</p> <p>4. The alternative of the execution of a valid settlement agreement will place no incentive on the part of the contestable customer to fully settle its obligations to the NSP/DU.</p>		<p>b) requires concurrence from both parties thus, ensuring that the terms of such settlement agreement is acceptable to both incumbent Supplier/NSPs and Retail Customers and are at liberty to accept or reject its execution; and c) is legally binding.</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 54 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>5. A settlement agreement would unnecessarily burden the DU/NSP with respect to negotiating the terms and conditions of every single contestable customer who avails of this alternative.</p> <p>Ultimately, considering that the settlement agreement will have to be carefully negotiated (which belies proposal to have the settlement agreement executed within 2 days), it will have the consequence of further delaying the switch of the contestable customer.</p>			
Conditions for Customer Switching	3.2.1	(new)	<u>3.2.1.6 Relative to the condition for switch under Clause 3.2.1.3(c) of this Retail Rules, the Retail Customer may submit a request for certification of no outstanding balance from its Network Service Provider, for initial switch, or from its incumbent</u>	The proposed amendments intend to introduce a pre-switching procedure that Retail Customers may follow to facilitate the timely compliance with the "no outstanding	<p><u>PEMC:</u></p> <p>1. The proposed alternative documents in Clause 3.2.2.1, are sufficient to address the issues of delay in complying with the switching requirement under Clause 3.2.1.3</p>		<p>Noted on PEMC's concurrence with IEMOP's proposed alternative documents.</p> <p>Regarding the pre-switching</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 55 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p><u>Supplier, for regular switch, at least fourteen (14) working days prior to the proposed effective switch date and furnish a copy of the request to the Central Registration Body and the prospective Supplier.</u></p> <p><u>3.2.1.7 The Network Service Provider or the incumbent Supplier shall notify the Retail Customer of any unpaid balance within two (2) working days from receipt of the Retail Customer's request and furnish a copy of the notice to the Central Registration Body and the prospective Supplier.</u></p> <p><u>3.2.1.8 Within two (2) working days from receipt of the Network Service Provider or the incumbent Supplier's notice, the Retail Customer shall:</u></p> <p><u>a) Settle the unpaid balance with the Network Service Provider or the incumbent Supplier; or</u></p>	<p>obligation" requirement pursuant to Clause 3.2.1.3(c) Aside from outright payment of outstanding balance, we propose that execution of a valid settlement agreement be considered as fulfillment of switch condition under Clause 3.2.1.3(c) to mitigate unreasonable withholding of Retail Customers' ability to switch to a new Supplier.</p>	<p>(c), i.e. for Retail Customers to have no outstanding balance with a Network Service Provider or an incumbent Supplier.</p> <p>In addition, these alternative documents will also address cases wherein the contract period between the NSP or RES and its customers has not yet ended. The proposed pre-switching procedures unduly involve the CRB on matters that are outside of its responsibilities. These procedures should be addressed between the NSP or RES and its customers. Retail participants may incorporate the pre-switching procedures in their supply contracts, rather than in the rules or manuals.</p>		<p>procedures, IEMOP's primary objective is to provide a definite timeline for the incumbent Supplier or NSP to act on requests for issuance of certification of no outstanding balance so that the Retail Customer is provided assurance that it is not being unreasonably withheld from switching to a new Supplier.</p> <p>The proposal to furnish the CRB of the notices relating to no outstanding balance is for informational purposes only. In the evaluation of the switch request, the CRB shall still refer to the documents submitted pursuant to the proposed</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 56 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p><u>b) Initiate a settlement agreement with the Network Service Provider or the incumbent Supplier Provided that any action undertaken under this clause shall be without prejudice to filing of dispute of involved parties with the Energy Regulatory Commission.</u></p> <p><u>3.2.1.9 Within two (2) working days from the Retail Customer's action relative to clause 3.2.2.2, the Network Service Provider or the incumbent Supplier shall:</u></p> <p><u>a) Sign a certification of no outstanding balance and provide the same to the Retail Customer and new Supplier; or</u></p> <p><u>b) Execute a valid settlement agreement with the Retail Customer and provide a copy to the new Supplier.</u></p>		<p>2. For clarification on the proposed pre-switching procedures, will the MO monitor the compliance on the proposed timelines and requirements?</p>		<p>Retail Rules Clause 3.2.2.1 The CRB will not be involved in the parties' negotiation efforts. It will accept documents submission and note if these were submitted timely. The pre-switching process will not proceed should the responsible party fail to provide any of the required documents.</p>	
					<p>MERALCO: Under the proposed Section 3.2.6, it is the Retail Customer that submitted a request for a certification of no outstanding balance from its NSP or incumbent Supplier, copy furnished the CRB and prospective Supplier. However, in proposed Section 3.2.17, the NSP or incumbent Supplier, in notifying or responding to the Retail Customer, is required to furnish a copy of such notice to the CRB and</p>	<p>MERALCO: <u>3.2.1.7 The Network Service Provider or the incumbent Supplier shall notify the Retail Customer of any unpaid balance within two (2) working days from receipt of the Retail Customer's request and furnish a copy of the notice to the Central Registration Body and the prospective Supplier. The Retail Customer shall</u></p>	<p>Agree with proposed revision to Section 3.2.1.7. The notice need not contain details of the unpaid amount.</p> <p>Subject to further inputs from representatives from Suppliers and Retail Customers, we deem that execution of settlement agreement may be an acceptable mechanism for</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 57 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>the prospective Supplier. Absent any authority or consent from the Retail Customer, the NSP or incumbent Supplier is precluded from providing information on the outstanding balance, if any, of the Retail Customer as the Retail Customer may regard such information as confidential in nature which may affect its leverage in negotiating its RSCs with Suppliers.</p> <p>Regarding Section 3.2.1.8, it should be noted that the following issuances</p> <ul style="list-style-type: none"> - ERC Resolution No. 9 series of 2018 Art II, Section 1, - GEOP Rules Art II, Section 4.4; and - Section 3.2.1.3 of the Retail Rules as amended by DOE Department Circular No. DC2021-06-0012 <p>generally provide that a contestable customer or an eligible End-user shall be required to settle outstanding balance prior</p>	<p><u><i>furnish a copy of the notice to the CRB and the prospective Supplier.</i></u></p> <p><i>3.2.1.8 Within two (2) working days from receipt of the Network Service Provider or the incumbent Supplier's notice, the Retail Customer shall settle the unpaid balance with the Network Service Provider or the incumbent Supplier.:</i></p> <p><i>a) Settle the unpaid balance with the Network Service Provider or the incumbent Supplier;</i></p> <p><i>or</i></p> <p><i>b) Initiate a settlement agreement with the Network Service Provider or the incumbent Supplier</i></p> <p><i>Provided that any action undertaken under this clause shall be without prejudice to filing of</i></p>	<p>resolving financial obligations between the incumbent Supplier/NSPs and Retail Customers as it:</p> <p>a) confirms the Retail Customer's commitment to settle any unpaid amounts;</p> <p>b) requires concurrence from both parties thus, ensuring that the terms of such settlement agreement is acceptable to both incumbent Supplier/NSPs and Retail Customers and are at liberty to accept or reject its execution; and</p> <p>c) is legally binding.</p> <p>Regarding the recommendation to provide a template for the certification to be signed by the incumbent Supplier/NSP, we</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 58 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					to switching and that the Switch Request Form includes a confirmation from the DU or incumbent supplier, whichever is applicable, that the eligible end-user has no Outstanding balance submitted to CRB by prospective Supplier no later than (7) days before the proposed switch date. Note that collection of arrears is covered by the DU's Agreement for Sale of Electric Energy which is effective until the termination of contract due. This will be replaced by the Connection Agreement, which has no commercial terms and conditions. Regarding proposed Section 3.2.1.9, if the Certification (under item a) is to be issued separately as proposed, may we suggest for IEMOP to issue prescribed template for uniformity. Comments on the template should first be solicited so that it can consider inputs from	<p>dispute of involved parties with the Energy Regulatory Commission.</p> <p>3.2.1.9 Within two (2) working days from the Retail Customer's action relative to clause 3.2.2.2, the Network Service Provider or the incumbent Supplier shall sign a certification of no outstanding balance and provide the same to the Retail Customer. The Retail Customer shall furnish a copy of the certification to the new Supplier.</p> <p>a) Sign a certification of no outstanding balance and provide the same to the Retail Customer and new Supplier; or</p> <p>b) Execute a valid settlement agreement with the Retail Customer and provide a copy to the new Supplier.</p>	would like to inform that this is already included in the Attestation templates used for RCOA and the GEOP Switch Request Form for GEOP. But we note that the Attestation template may be revised depending on the approved amendments.	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 59 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					relevant market participants. For item (b), we recommend that the Settlement Agreement should be between the Retail Customer and NSP/incumbent supplier only. Thus, there is no need to include this in the market manuals. The execution and conditions of such agreement shall be indicated in the Certification issued by NSP/incumbent supplier to prospective Supplier. <i>We reiterate our detailed discussion on this item in our general comment.</i>			
Procedures for Switching	3.2.2.1	3.2.2.1 Once all the conditions set forth in Clause 3.2.1.3 are met, the new <i>Supplier</i> shall submit the switch request to the <i>Central Registration Body</i> not later than seven (7) working days prior to the proposed effective date.	3.2.2.1 Once all the conditions set forth in Clause 3.2.1.3 are met, the new <i>Supplier</i> shall submit the switch request to the <i>Central Registration Body</i> not later than seven (7) working days prior to the proposed effective date. The switch request shall <u>be electronically filled out and</u>	The proposed amendments aim to provide other options for the new Supplier and the Retail Customer to fulfill the switch condition under Clause 3.2.1.3(c) aside from submission of a certification of no				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 60 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (in bold red underlined font)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p>The switch request shall <u>be electronically filled out and shall</u> include an attestation duly signed by a <u>confirmation from authorized representatives of the following:</u></p> <p>a) the <i>Supplier</i> and the <i>Contestable Retail Customer</i> of the existence of a retail/<u>GEOP</u> supply contract <u>or any equivalent thereof</u> between the two parties, and the term of the retail supply contract including the effectivity dates;</p> <p>the <i>Supplier</i> or the <i>Contestable Retail Customer</i>, as applicable, and the relevant Distribution Utility <u>or Network Service Provider</u> of the existence of a valid wheeling service agreement covering the Contestable Customer; and</p> <p>the <i>Supplier</i> or the <i>Contestable Retail</i></p>	<p><u>shall</u> include an attestation <u>duly signed by a confirmation from authorized representatives of the following:</u></p> <p>a) the <i>Supplier</i> and the Contestable <u>Retail Customer</u> of the existence of a retail/<u>GEOP</u> supply contract <u>or any equivalent thereof</u> between the two parties, and the term of the retail supply contract including the effectivity dates;</p> <p>the <i>Supplier</i> or the Contestable <u>Retail Customer</u>, as applicable, and the relevant Distribution Utility <u>or Network Service Provider</u> of the existence of a valid wheeling service agreement covering the Contestable Customer; and</p> <p>the <i>Supplier</i> or the Contestable <u>Retail</u></p>	<p>outstanding balance. Thus, the proposed amendments allow the CRB to provisionally accept a signed undertaking by the Retail Customer during the submission of the switch request which shall be subject to confirmation by the Network Service Provider or the incumbent Supplier prior to the proposed switch date. This way, the new Supplier and Retail Customer will not be unreasonably prevented from submitting a switch request while the Network Service Provider and incumbent Supplier still has the opportunity to</p>	<p>PEMC: The additional alternative documents are sufficient to address the issues of delay in complying with the</p>		<p>Noted on PEMC's concurrence with IEMOP's proposed alternative documents.</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 61 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (in bold red underlined font)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p>service agreement covering the Contestable Customer;</p> <p>the <i>Supplier</i> or the Contestable Retail Customer, as applicable, and the registered <i>Retail Metering Services Provider</i> of the existence of a valid metering services agreement covering the <i>Retail Customer</i>; and</p> <p>d) the incumbent <i>Supplier</i> or, if not served by a <i>Supplier</i>, the relevant <i>Distribution Utility</i> that the Contestable Retail Customer has no outstanding balance.</p> <p><u>The Central Registration Body may require submission of appropriate documentation to ensure the authorized representatives have authority to represent their respective organizations.</u></p>	<p><i>Customer</i>, as applicable, and the registered <i>Retail Metering Services Provider</i> of the existence of a valid metering services agreement covering the <i>Retail Customer</i>; and</p> <p>d) the incumbent Supplier or, if not served by a Supplier, the relevant Distribution Utility that the Contestable Retail Customer has no outstanding balance.</p> <p><u>Relative to the condition for switch under Clause 3.2.1.3(c) of this Retail Rules, the new Supplier shall also submit either of the following seven (7) working days prior to the proposed effective date:</u></p> <p>a) <u>Certification that the Retail Customer has no outstanding balance signed by the Network Service Provider or incumbent Supplier;</u></p>	<p>contest switching of Customers with unpaid balances in a timely manner.</p>	<p>switching requirement under Clause 3.2.1.3 (c),</p> <p>MERALCO: Considering that (a) the requirement under existing regulations is for the customer to pay its outstanding obligations before it is allowed to switch; and (b) switch requests presume that customer is eligible to switch, then it cannot be said that the submission of such request is “unreasonably prevented” if no certification has been provided in the meantime, pending compliance by customer of the requirement. In addition, it is sensible to afford Network Service Providers and/or Incumbent Suppliers reasonable time, as prescribed in the existing Retail Manual for Market Transaction Procedures, to verify from their records whether or not the customer</p>	<p>MERALCO: Relative to the condition for switch under Clause 3.2.1.3(c) of this Retail Rules, the new Supplier shall also submit a <u>Certification that the Retail Customer has no outstanding balance signed by the Network Service Provider or incumbent Supplier either of the following seven (7) working days prior to the proposed effective date:</u></p> <p>Certification that the Retail Customer has no outstanding balance signed by the Network Service Provider or incumbent Supplier;</p>	<p>The proposed wording is technically the same as the original provision, The submission of an undertaking signed by the Retail Customer is proposed as an alternative to provide the prospective Supplier an opportunity to <i>initiate</i> submission of the switch request to the CRB. However, mere submission of such undertaking does not warrant approval of the switch request as confirmation of the incumbent Supplier or NSP shall be required by CRB. Without the corresponding</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 62 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p>The <i>Supplier</i> or the <i>Contestable Retail Customer</i> registering as a <i>Direct WESM Member</i> shall also submit the projected metering quantities and the percentage that will be purchased from the <i>WESM</i> by the <i>Contestable Retail Customer</i>, as applicable.</p> <p>The <i>Central Registration Body</i> shall immediately evaluate the completion of the abovementioned requirements, including verification of information of the <i>Contestable Retail Customer</i> as submitted by the <i>Distribution Utilities</i> under Clause 2.3.1.1, and shall notify the <i>Supplier</i> and the <i>Retail Contestable Customer</i>, as applicable, on the status and further requirements, if any, such as prudential requirement, for the approval of switch request within two (2) working days from the</p>	<p>b) <u>Copy of valid settlement agreement signed by the Retail Customer and the Network Service Provider or incumbent Supplier;</u> or c) <u>Undertaking signed by the Retail Customer that it has no outstanding balance with the Network Service Provider or incumbent Supplier, provided that the Network Service Provider or incumbent Supplier shall provide confirmation of such undertaking to the Central Registration Body three (3) working days prior to the proposed switch date.</u></p>		<p>has any outstanding obligations. The submission of an undertaking signed by the Retail Customer (as proposed under Section 3.2.2.1.c) is self-serving considering that only the Network Service Provider and/or Incumbent Supplier can certify that the Retail Customer has no outstanding balance. This is recognized in the proposed provision since the NSP or Incumbent Supplier is required to provide confirmation three (3) working days before the switch date. It is unclear what would happen if the NSP or Incumbent Supplier failed to provide a confirmation prior to the switch. Would the CRB take the Retail Customer's undertaking on its face value? On the other hand, what would happen if the customer submitted an undertaking and the NSP or Supplier did not confirm the same? Which would</p>	<p>Copy of valid settlement agreement signed by the Retail Customer and the Network Service Provider or incumbent Supplier; or Undertaking signed by the Retail Customer that it has no outstanding balance with the Network Service Provider or incumbent Supplier, provided that the Network Service Provider or incumbent Supplier shall provide confirmation of such undertaking to the Central Registration Body three (3) working days prior to the proposed switch date.</p>	<p>confirmation, the CRB shall not approve the switch request. However, the incumbent Supplier or NSP should endeavor to provide a response on the undertaking, whether affirmatively or otherwise. Subject to penalty provisions that may be developed in line with this proposal, failure of an incumbent Supplier or NSP to provide confirmation within the prescribed timeline shall result to non-compliance. We note however that determination of non-compliances should be based on the prevailing rules on dispute and determination of the ERC in exercise of its regulatory functions.</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 63 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p>receipt of the switch request. All shortcomings by the Supplier and the Contestable Retail Customer shall be rectified within two (2) working days from the receipt of the <i>Central Registration Body's</i> notice.</p> <p><u>In view of the need for enhancements to the Central Registration and Settlement System (CRSS) to implement the electronic-based switching, it is understood that the electronic-based switching shall take effect no later than fifteen (15) days from the date of issuance of the audit software certificate of the system enhancements.</u></p>	<p><u>The Central Registration Body may require submission of appropriate documentation to ensure the authorized representatives have authority to represent their respective organizations.</u></p> <p>The <i>Supplier</i> or the Contestable Retail Customer registering as a <i>Direct WESM Member</i> shall also submit the projected metering quantities and the percentage that will be purchased from the <i>WESM</i> by the Contestable Retail Customer, as applicable.</p> <p>The <i>Central Registration Body</i> shall immediately evaluate the completion of the abovementioned requirements, including verification of information of the Contestable Retail Customer as submitted by the <i>Distribution Utilities</i> under Clause 2.3.1.1, and shall</p>		<p>prevail? Since the regulation provides that the outstanding balance must be paid, regardless if under dispute, then the NSP or Incumbent Supplier's certification should prevail. Consistent with our comment on Section 3.2.1.9, we recommend that the Settlement Agreement (under item b) should be between the Retail Customer and NSP/incumbent supplier only. The execution and conditions of such agreement shall be indicated in the Certification issued by NSP/incumbent supplier to prospective Supplier.</p>		<p>Subject to further inputs from representatives from Suppliers and Retail Customers, it is proposed that the execution of settlement agreement may be considered an acceptable mechanism for resolving financial obligations between the incumbent Supplier/NSPs and Retail Customers as it:</p> <ul style="list-style-type: none"> a) confirms the Retail Customer's commitment to settle any unpaid amounts; b) requires concurrence from both parties thus, ensuring that the terms of such settlement agreement is acceptable to both incumbent Supplier/NSPs and Retail Customers 	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 64 of 124

Retail Rules								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (in bold red underlined font)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p>notify the <i>Supplier</i> and the <u>Retail Contestable Customer</u>, as applicable, on the status and further requirements, if any, such as prudential requirement, for the approval of switch request within two (2) working days from the receipt of the switch request. All shortcomings by the Supplier and the Contestable <u>Retail</u> Customer shall be rectified within two (2) working days from the receipt of the <i>Central Registration Body's</i> notice.</p> <p><u>In view of the need for enhancements to the Central Registration and Settlement System (CRSS) to implement the electronic-based switching, it is understood that the electronic-based switching shall take effect no later than fifteen (15) days from the date of issuance of the audit software certificate of the system enhancements.</u></p>				and are at liberty to accept or reject its execution; and c) is legally binding.	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 65 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (<u>in bold red underlined font</u>)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>PEMC: Same general comments as above.</p>			
					<p>MERALCO: We would like to request clarification on the following statement from the proponent:</p> <p><i>“With these rule change recommendations, we hope to mitigate unreasonable withholding of Retail Customers’ ability to switch to new Suppliers by enabling prospective Suppliers to initiate switch requests while providing Network Service Providers/incumbent Suppliers the opportunity to contest switching of Customers with unpaid balances in a timely manner.”</i></p> <p>May if we ask there is a study on the root cause of the delay</p>		Same response to MERALCO’s general comment on the Retail Rules.	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 66 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (<u>in bold red underlined font</u>)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>cited in this proposal? An in-depth assessment of the current situation will allow stakeholders to see if the proposed rules change properly addresses the causes of the delays. If the delay is due to the customer having unsettled/outstanding obligations with the Network Service Provider and/or Incumbent Supplier, then the proper solution is to settle the obligation—not rules change.</p> <p>Also, the timetable for the issuance of the Certification of No Outstanding Obligation is already provided in the Retail Manual for Market Transaction Procedures (Section 3.1.1). If the certification is indeed being purposefully withheld, the affected Retail Customer may elevate the matter to ERC.</p> <p>We respectfully point out that the Retail Rules should be interpreted and read alongside the relevant ERC issuances, such as ERC Resolution No. 9, Series of 2018 (“Supplemental Switching</p>			

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 67 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>Rules”) and ERC Resolution No. 8, Series of 2021 (“GEOP Rules”), which provide the legal framework for the implementation of Retail Competition and Open Access (RCOA) and Green Energy Option Program (GEOP). Thus, any proposed amendment should be consistent and aligned with the ERC rules. In particular, ERC’s Supplemental Switching Rules provide the procedure for switching and billing of contestable customers.</p> <p>Section 1(a) of the said ERC Supplemental Switching Rules unequivocally states that, “<u>No contestable customer shall be allowed to Switch or be supplied by a new RES or SOLR should it have an outstanding balance with its Network Service Provide, in case of initial switch, or its incumbent RES. Whether under dispute or not, the Contestable Customer shall be required to settle its outstanding balance prior to Switching.</u>”</p>			

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 68 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>It is clear that the contestable customer is expected to fully satisfy its obligations to the Network Service Provider before it may be allowed to switch <u>whether the outstanding obligation is disputed by the contestable customer or not.</u></p> <p>Thus, the proposed amendments pose the following major concerns:</p> <ol style="list-style-type: none"> 1. It is not consistent with Section 1(a) of the Supplemental Switching Rules. 2. The mere execution of a valid settlement agreement as fulfillment for the condition under Clause 3.2.1.3(c) of the Retail Rules defeats the purpose and intention for such clause. <p>Clause 3.2.1.3(c) is clear that the contestable customer should have no</p>			

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 69 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					financial obligations to the NSP. A valid settlement agreement cannot be considered as full satisfaction of a contestable customer's outstanding balance. 3. If required as an alternative, the NSP/DU shall be placed at the mercy of the contestable customer's willingness to satisfy the terms and conditions of the settlement agreement. It is clear from the ERC Supplemental Switching Rules that the intention is for the contestable customer to fully pay its obligations. In contrast, the proposed amendment now imposes an additional responsibility and lookout on the part of the DU/NSP to ensure that the contestable customer is able to settle its obligations within the			

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 70 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (<u>in bold red underlined font</u>)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>terms and conditions of the settlement agreement.</p> <p>4. The alternative of the execution of a valid settlement agreement will place no incentive on the part of the contestable customer to fully settle its obligations to the NSP/DU.</p> <p>5. A settlement agreement would unnecessarily burden the DU/NSP with respect to negotiating the terms and conditions of every single contestable customer who avails of this alternative.</p> <p>Ultimately, considering that the settlement agreement will have to be carefully negotiated (which belies proposal to have the settlement agreement executed within 2 days), it will have the consequence of further delaying the switch of the contestable customer.</p>			
Overview	II.2	(new)	<u>2.5 Relative to the condition for switch under Clause</u>	Note: The Retail Manual on Market	PEMC:		Same response to PEMC's comment on	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 71 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (<u>in bold red underlined font</u>)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p><u>II.2.3.3 of this manual, the Contestable Customer may submit a request for certification of no outstanding balance from its Network Service Provider, for initial switch, or from its incumbent Supplier, for regular switch, at least fourteen (14) working days prior to the proposed effective switch date and furnish a copy of the request to the Central Registration Body and the prospective Supplier.</u></p> <p><u>2.6 The Network Service Provider or the incumbent Supplier shall notify the Contestable Customer of any unpaid balance within two (2) working days from receipt of the Contestable Customer's request and furnish a copy of the notice to the Central Registration Body and the prospective Supplier.</u></p> <p><u>2.7 Within two (2) working days from receipt of the Network Service Provider or the incumbent Supplier's</u></p>	<p>Transactions Procedures governs transactions between Retail Electricity Suppliers and Contestable Customers as defined in Chapter 1 of the manual.</p> <p>The proposed amendments intend to introduce a pre-switching procedure that Contestable Customers may follow to facilitate the timely compliance with the "no outstanding obligation" requirement pursuant to Clause II.2.3.3. Aside from outright payment of outstanding balance, we propose that</p>	<p>Same comments with Section 3.2.1 of Retail Rules</p> <p>MERALCO: Under the proposed Section 2.5, it is the Retail Customer that submitted a request for a certification of no outstanding balance from its NSP or incumbent Supplier, copy furnished the CRB and prospective Supplier. However, in proposed Section 2.6, the NSP or incumbent Supplier, in notifying or responding to the Retail Customer, is required to furnish a copy of such notice to the CRB and the prospective Supplier. Absent any authority or consent from the Retail Customer, the NSP or incumbent Supplier is precluded from providing information on the outstanding balance, if any, of the Retail Customer as the latter may regard such information as confidential in nature which may affect its leverage in negotiating its RSCs with Suppliers. Regarding Section 2.8, it should be noted that the following issuances</p>	<p>MERALCO: <u>2.6 The Network Service Provider or the incumbent Supplier shall notify the Retail Customer of any unpaid balance within two (2) working days from receipt of the Retail Customer's request and furnish a copy of the notice to the Central Registration Body and the prospective Supplier. The Retail Customer shall furnish a copy of the notice to the CRB and the prospective Supplier.</u></p> <p><u>2.7 Within two (2) working days from receipt of the Network Service Provider or the incumbent Supplier's notice, the Retail Customer shall</u></p>	<p>Section 3.2.1 of the Retail Rules.</p> <p>Same response to MERALCO's comment on Section 3.2.1 of the Retail Rules.</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 72 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (<u>in bold red underlined font</u>)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p><u>notice, the Contestable Customer shall:</u> <u>a) Settle the unpaid balance with the Network Service Provider or the incumbent Supplier; or</u> <u>b) Initiate a settlement agreement with the Network Service Provider or the incumbent Supplier</u> <u>Provided that any action undertaken under this clause shall be without prejudice to filing of dispute of involved parties with the Energy Regulatory Commission.</u></p> <p><u>2.8 Within two (2) working days from the Contestable Customer's action relative to clause 2.7, the Network Service Provider or the incumbent Supplier shall:</u> <u>a) Sign the certification of no outstanding balance and provide the same to the Contestable Customer and the new Supplier; or</u></p>	<p>execution of a valid settlement agreement be considered as fulfillment of switch condition under Clause II.2.3.3. to mitigate or avoid a situation where the Contestable Customer is unreasonably prevented from switching to a new Supplier due to inability to provide the requirement.</p>	<ul style="list-style-type: none"> - ERC Resolution No. 9 series of 2018 Art II, Section 1, - GEOP Rules Art II, Section 4.4; and - Section 3.2.1.3 of the Retail Rules as amended by DOE Department Circular No. DC2021-06-0012 <p>generally provide that a contestable customer or an eligible End-user shall be required to settle outstanding balance prior to switching and that the Switch Request Form includes a confirmation from the DU or incumbent supplier, whichever is applicable, that the eligible end-user has no Outstanding balance submitted to CRB by prospective Supplier no later than (7) days before the proposed switch date. Note that collection of arrears is covered by the DU's Agreement for Sale of Electric Energy which is effective until the termination of contract due. This will be replaced by the Connection Agreement,</p>	<p><u>settle the unpaid balance with the Network Service Provider or the incumbent Supplier.:</u> <u>a) Settle the unpaid balance with the Network Service Provider or the incumbent Supplier;</u> <u>or</u> <u>b) Initiate a settlement agreement with the Network Service Provider or the incumbent Supplier</u> <u>Provided that any action undertaken under this clause shall be without prejudice to filing of dispute of involved parties with the Energy Regulatory Commission.</u> <u>2.8 Within two (2) working days from the Retail Customer's action relative to clause 3.2.2.2, the Network Service Provider or</u></p>		

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 73 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (in bold red underlined font)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<u>b. Execute a valid settlement agreement with the Contestable Customer and provide a copy to the new Supplier.</u>		which has no commercial terms and conditions. Regarding proposed Section 2.8, if the Certification (under item a) is to be issued separately as proposed, may we suggest for IEMOP to issue prescribed template for uniformity. Comments on the template should first be solicited so that it can consider inputs from relevant market participants. For item (b), we recommend that the Settlement Agreement should be between the Retail Customer and NSP/incumbent supplier only. Thus, there is no need to include this in the market manuals. The execution and conditions of such agreement shall be indicated in the Certification issued by NSP/incumbent supplier to prospective Supplier. <i>We reiterate our detailed discussion on this item in our general comment.</i>	the incumbent Supplier shall sign a certification of no outstanding balance and provide the same to the Retail Customer. The Retail Customer shall furnish a copy of the certification to the new Supplier. a) Sign a certification of no outstanding balance and provide the same to the Retail Customer and new Supplier; or b) Execute a valid settlement agreement with the Retail Customer and provide a copy to the new Supplier.		
Switching Procedures	II.3.1.1	3.1.1. Once all requirements are met, an accomplished switch	3.1.1. Once all requirements are met, an accomplished switch request form shall be	Note: The Retail Manual on Market Transactions Procedures				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 74 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (in bold red underlined font)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p>request form shall be submitted by the new Supplier shall submit the switch request to the Central Registration Body not later than seven (7) working days before the proposed switch effective date. The switch request form shall be electronically filled out and shall include an attestation duly signed by a confirmation by the authorized representatives of the following:</p> <p>a) The <i>Supplier</i> and the <i>Contestable Customer</i> of the existence of a <i>retail supply contract</i> between the two parties, and the term of the <i>retail supply contract</i> including the effectivity dates;</p>	<p>submitted by the new Supplier shall submit the switch request to the Central Registration Body not later than seven (7) working days before the proposed switch effective date. The switch request form shall be electronically filled out and shall include an attestation duly signed by a confirmation by the authorized representatives of the following:</p> <p>a) The <i>Supplier</i> and the <i>Contestable Customer</i> of the existence of a <i>retail supply contract</i> between the two parties, and the term of the <i>retail supply contract</i> including the effectivity dates;</p> <p>The <i>Supplier</i> or the <i>Contestable Customer</i>, as applicable, and the</p>	<p><i>governs transactions between Retail Electricity Suppliers and Contestable Customers as defined in Chapter 1 of the manual.</i></p> <p>The proposed amendments aim to provide other options for the new Supplier and the Contestable Customer to fulfill the switch condition under Clause II.2.3.3. aside from submission of a certification of no outstanding balance. Thus, the proposed amendments allow the CRB to provisionally accept a signed undertaking by the Contestable Customer during</p>				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 75 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (in bold red underlined font)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p>The <i>Supplier</i> or the <i>Contestable Customer</i>, as applicable, and the relevant <i>Distribution Utility or Network Service Provider</i> of the existence of a valid wheeling service agreement covering the <i>Contestable Customer</i>,</p> <p>The <i>Supplier</i> or the <i>Contestable Customer</i>, as applicable, and the registered <i>Retail Metering Services Provider</i> of the existence of a valid metering services agreement covering the <i>Contestable Customer</i>, and</p> <p>d) The incumbent <i>Supplier</i> or, if not served by a <i>Supplier</i>, the relevant <i>Distribution Utility</i> that the <i>Contestable Customer</i> has no outstanding balance.</p>	<p>relevant <i>Distribution Utility or Network Service Provider</i> of the existence of a valid wheeling service agreement covering the <i>Contestable Customer</i>, and</p> <p>The <i>Supplier</i> or the <i>Contestable Customer</i>, as applicable, and the registered <i>Retail Metering Services Provider</i> of the existence of a valid metering services agreement covering the <i>Contestable Customer</i>; and</p> <p>d) The incumbent <i>Supplier</i> or, if not served by a <i>Supplier</i>, the relevant <i>Distribution Utility</i> that the <i>Contestable Customer</i> has no outstanding balance. Relative to the condition for switch under Clause II.2.3.3 of this manual, the new <i>Supplier</i> shall also submit either of the following seven</p>	<p>the submission of the switch request which shall be subject to confirmation by the Network Service Provider or the incumbent Supplier prior to the proposed switch date. This way, the new Supplier and Contestable Customer will not be unreasonably prevented from submitting a switch request while the Network Service Provider or incumbent Supplier still has the opportunity to contest switching of Customers with unpaid balances in a timely manner.</p>	<p>PEMC: Same comments with Section 3.2.2.1 of Retail Rules</p> <p>MERALCO: Considering that (a) the requirement under existing regulations is for the customer to pay its outstanding obligations before it is allowed to switch; and (b) switch requests presume that customer is eligible to switch, then it cannot be said that the submission of such request is “unreasonably prevented” if no certification has been provided in the meantime, pending compliance by customer of the requirement. In addition, it is sensible to afford Network Service Providers and/or Incumbent Suppliers reasonable time, as prescribed in the existing Retail Manual for Market Transaction Procedures, to verify from their records whether or not the customer has any outstanding obligations.</p>	<p>MERALCO: Relative to the condition for switch under Clause II.2.3.3 of this manual, the new <i>Supplier</i> shall also submit a Certification that the Retail Customer has no outstanding balance signed by the Network Service Provider or incumbent Supplier either of the following seven (7) working days prior to the proposed effective date:</p> <p>a) Certification that the Retail Customer has no outstanding balance signed by the Network Service</p>	<p>Same response to PEMC's comment on Section 3.2.2.1 of the Retail Rules.</p> <p>Same response to MERALCO's comment on Section 3.2.2.1 of the Retail Rules.</p>	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 76 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <i>(in bold red underlined font)</i>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p><u>The <i>Central Registration Body</i> may require submission of appropriate documentation to ensure the authorized representatives have authority to represent their respective organizations.</u></p> <p>The <i>Supplier</i> or <i>Contestable Customer</i> registering as a <i>Direct WESM Member</i> shall also submit the projected metering quantities and the percentage that will be purchased from the <i>WESM</i> by the <i>Contestable Customer</i>, as applicable.</p> <p><u>In view of the need for enhancements to the Central Registration and Settlement System (CRSS) to implement the electronic-based switching process, it is understood that the</u></p>	<p><u>(7) working days prior to the proposed effective date:</u></p> <p>a) <u>Certification that the Contestable Customer has no outstanding balance signed by the Network Service Provider or incumbent Supplier;</u></p> <p>b) <u>Copy of valid settlement agreement signed by the Contestable Customer and the Network Service Provider or incumbent Supplier;</u></p> <p>c) <u>Undertaking signed by the Contestable Customer that it has no outstanding balance with the Network Service Provider or incumbent Supplier, provided that the Network Service Provider or incumbent Supplier</u></p>		<p>The submission of an undertaking signed by the Retail Customer (as proposed under Section 3.1.1.c) is self-serving considering that only the Network Service Provider and/or Incumbent Supplier can certify that the Retail Customer has no outstanding balance. This is recognized in the proposed provision since the NSP or Incumbent Supplier is required to provide confirmation three (3) working days before the switch date. It is unclear what would happen if the NSP or Incumbent Supplier failed to provide a confirmation prior to the switch. Would the CRB take the Retail Customer's undertaking on its face value? On the other hand, what would happen if the customer submitted an undertaking and the NSP or Supplier did not confirm the same? Which would prevail? Since the regulation provides that the outstanding balance must be paid, regardless if under dispute, then the NSP or Incumbent Supplier's certification should prevail.</p>	<p>Provider or incumbent Supplier;</p> <p>b) Copy of valid settlement agreement signed by the Retail Customer and the Network Service Provider or incumbent Supplier;</p> <p>or</p> <p>c) Undertaking signed by the Retail Customer that it has no outstanding balance with the Network Service Provider or incumbent Supplier, provided that the Network Service Provider or incumbent Supplier shall provide confirmation of such undertaking to the Central Registration Body three (3) working days prior to the proposed switch date.</p>		

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 77 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (in bold red underlined font)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<u>electronic-based switching shall take effect no later than fifteen (15) days from the date of issuance of the audit software certificate of the system enhancements.</u>	<p><u>shall provide confirmation of such undertaking to the Central Registration Body three (3) working days prior to the proposed switch date.</u></p> <p><u>The Central Registration Body may require submission of appropriate documentation to ensure the authorized representatives have authority to represent their respective organizations.</u></p> <p>The <i>Supplier</i> or <i>Contestable Customer</i> registering as a <i>Direct WESM Member</i> shall also submit the projected metering quantities and the percentage that will be purchased from the <i>WESM</i> by the <i>Contestable Customer</i>, as applicable.</p> <p><u>In view of the need for enhancements to the</u></p>		Consistent with our comment on Section 3.2.1.9, we recommend that the Settlement Agreement (under item b) should be between the Retail Customer and NSP/incumbent supplier only. The execution and conditions of such agreement shall be indicated in the Certification issued by NSP/incumbent supplier to prospective Supplier.			

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 78 of 124

Retail Manual on Market Transactions Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<u>Central Registration and Settlement System (CRSS) to implement the electronic-based switching process, it is understood that the electronic-based switching shall take effect no later than fifteen (15) days from the date of issuance of the audit software certificate of the system enhancements.</u>					

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 79 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>PEMC:</p> <p>Same general comments as above.</p>			
					<p>We would like to request clarification on the following statement from the proponent:</p> <p><i>“With these rule change recommendations, we hope to mitigate unreasonable withholding of Retail Customers’ ability to switch to new Suppliers by enabling prospective Suppliers to initiate switch requests while providing Network Service Providers/incumbent Suppliers the opportunity to contest switching of Customers with</i></p>		Same response to MERALCO’s general comment on the Retail Rules.	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 80 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p><i>unpaid balances in a timely manner."</i></p> <p>May if we ask there is a study on the root cause of the delay cited in this proposal? An in-depth assessment of the current situation will allow stakeholders to see if the proposed rules change properly addresses the causes of the delays. If the delay is due to the customer having unsettled/outstanding obligations with the Network Service Provider and/or Incumbent Supplier, then the proper solution is to settle the obligation—not rules change.</p> <p>Also, the timetable for the issuance of the Certification of No Outstanding Obligation is already provided in the Retail Manual for Market Transaction Procedures (Section 3.1.1). If the certification is indeed being unreasonably withheld, the affected Retail Customer may elevate the matter to ERC.</p> <p>We respectfully point out that the Retail Rules should be</p>			

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 81 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>interpreted and read alongside the relevant ERC issuances, such as ERC Resolution No. 9, Series of 2018 ("Supplemental Switching Rules") and ERC Resolution No. 8, Series of 2021 ("GEOP Rules"), which provide the legal framework for the implementation of Retail Competition and Open Access (RCOA) and Green Energy Option Program (GEOP). Thus, any proposed amendment should be consistent and aligned with the ERC rules. In particular, ERC's Supplemental Switching Rules provide the procedure for switching and billing of contestable customers.</p> <p>Section 1(a) of the said ERC Supplemental Switching Rules unequivocally states that, "<u>No contestable customer shall be allowed to Switch or be supplied by a new RES or SOLR should it have an outstanding balance with its Network Service Provider, in case of initial switch,</u> or its</p>			

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 82 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>incumbent RES. <u>Whether under dispute or not, the Contestable Customer shall be required to settle its outstanding balance prior to Switching.</u></p> <p>It is clear that the contestable customer is expected to fully satisfy its obligations to the Network Service Provider before it may be allowed to switch <u>whether the outstanding obligation is disputed by the contestable customer or not.</u></p> <p>Thus, the proposed amendments pose the following major concerns:</p> <ol style="list-style-type: none"> 1. It is not consistent with Section 1(a) of the Supplemental Switching Rules. 2. The mere execution of a valid settlement agreement as fulfillment for the condition under Clause 3.2.1.3(c) of the Retail Rules defeats the purpose and intention for such clause. 			

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 83 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>Clause 3.2.1.3(c) is clear that the contestable customer should have no financial obligations to the NSP.</p> <p>A valid settlement agreement cannot be considered as full satisfaction of a contestable customer's outstanding balance.</p> <p>3. If required as an alternative, the NSP/DU shall be placed at the mercy of the contestable customer's willingness to satisfy the terms and conditions of the settlement agreement. It is clear from the ERC Supplemental Switching Rules that the intention is for the contestable customer to fully pay its obligations. In contrast, the proposed amendment now imposes an additional responsibility and lookout on the part of the DU/NSP to ensure that the contestable</p>			

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 84 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>customer is able to settle its obligations within the terms and conditions of the settlement agreement.</p> <p>4. The alternative of the execution of a valid settlement agreement will place no incentive on the part of the contestable customer to fully settle its obligations to the NSP/DU.</p> <p>5. A settlement agreement would unnecessarily burden the DU/NSP with respect to negotiating the terms and conditions of every single contestable customer who avails of this alternative.</p> <p>Ultimately, considering that the settlement agreement will have to be carefully negotiated (which belies proposal to have the settlement agreement executed within 2 days), it will have the consequence of further delaying the switch of the contestable customer.</p>			

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 85 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <i>(in bold red underlined font)</i>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
CUSTOMER TRANSFER	3	<p>3.2 OVERVIEW</p> <p>3.2.1 The commercial transfer of the electricity supply of a GEOP End-User shall be facilitated by the prospective Renewable Energy Supplier through the submission of a switch request.</p> <p>3.2.2 In the case of a last resort event, the Central Registration Body shall facilitate the transfer of the GEOP End-User to the Supplier of Last Resort.</p>	<p>3.2 OVERVIEW</p> <p>3.2.1 The commercial transfer of the electricity supply of a GEOP End-User shall be facilitated by the prospective Renewable Energy Supplier through the submission of a switch request.</p> <p>3.2.2 In the case of a last resort event, the Central Registration Body shall facilitate the transfer of the GEOP End-User to the Supplier of Last Resort.</p> <p>3.2.3 A Renewable Energy Supplier may submit a switch request to the Central Registration Body if all of the following conditions are met:</p> <p>a) the end-user has settled its financial obligations with its Distribution Utility, if the end-user is switching</p>	<p><i>Note: The Retail Manual on Green Energy Option Program Procedures governs transactions between Renewable Energy Suppliers and GEOP End-Users as defined in Section 1.2 of the manual.</i></p> <p>Transferred original clause 3.3.1 to clause 3.2.3 of Section 3.2 for consistency with the format used in the Retail Rules and Retail Manual on Market Transaction Procedures.</p> <p>The proposed amendments intend to introduce a pre-switching procedure that GEOP End-Users may follow to</p>	<p>PEMC:</p> <p>Same comments with Section 3.2.1 of Retail Rules</p>		Same response to PEMC's comment on Section 3.2.1 of the Retail Rules.	
					<p>MERALCO:</p> <p>Under the proposed Section 3.2.3.4, it is the GEOP End-User that submitted a request for a certification of no outstanding balance from its NSP or incumbent Supplier, copy furnished the CRB and prospective Supplier. However, in proposed Section 3.2.3.5, the NSP or incumbent Supplier, in notifying or responding to the GEOP End-User, is required to furnish a copy of such notice to the CRB and the prospective Supplier. Absent any authority or consent from the Retail Customer, the NSP or incumbent Supplier is precluded from providing information on the outstanding balance, if any, of the Retail Customer as the Retail Customer may regard such information as confidential in nature which</p>	<p>MERALCO:</p> <p>3.2.3.5 The Network Service Provider or the incumbent Supplier shall notify the GEOP End-User of any unpaid balance within two (2) working days from receipt of the GEOP End-User's request and furnish a copy of the notice to the Central Registration Body and the prospective Renewable Energy Supplier. The GEOP End-User shall furnish a copy of the notice to the CRB and the prospective Renewable Energy Supplier.</p> <p>3.2.3.6 Within two (2) working days from receipt of the Network Service Provider or</p>	Same response to MERALCO's comment on Section 3.2.1 of the Retail Rules.	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 86 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p><u>from a Distribution Utility, or its incumbent Supplier;</u></p> <p>b) <u>the end-user has entered into a GEOP Supply Contract with a Renewable Energy Supplier;</u></p> <p>c) <u>the end-user has entered into a valid Metering Services Agreement with a registered Retail Metering Services Provider; and</u></p> <p>d) <u>if applicable, the Renewable Energy Supplier has entered into a valid Wheeling Services Agreement with the Distribution</u></p>	<p>facilitate the timely compliance with the “no outstanding obligation” requirement pursuant to Clause 3.2.3.a</p> <p>Aside from outright payment of outstanding balance, we propose that execution of a valid settlement agreement be considered as fulfillment of switch condition under Clause 3.2.3.a to mitigate or avoid a situation where the GEOP End-User is unreasonably prevented from switching to a new Renewable Energy Supplier due to inability to provide the requirement.</p>	<p>may affect its leverage in negotiating its RSCs with Suppliers.</p> <p>Regarding Section 3.2.3.6, it should be noted that the following issuances</p> <ul style="list-style-type: none"> - ERC Resolution No. 9 series of 2018 Art II, Section 1, - GEOP Rules Art II, Section 4.4; and - Section 3.2.1.3 of the Retail Rules as amended by DOE Department Circular No. DC2021-06-0012 <p>generally provide that a contestable customer or an eligible End-user shall be required to settle outstanding balance prior to switching and that the Switch Request Form includes a confirmation from the DU or incumbent supplier, whichever is applicable, that the eligible end-user has no Outstanding balance submitted to CRB by prospective Supplier no later than (7) days before the proposed switch date.</p> <p>Note that collection of arrears is covered by the DU's</p>	<p>the incumbent Supplier's notice, the GEOP End-User shall settle the unpaid balance with the Network Service Provider or the incumbent Supplier.:</p> <p>a)——Settle the unpaid balance with the Network Service Provider or the incumbent Supplier;</p> <p>or</p> <p>b)——Initiate a settlement agreement with the Network Service Provider or the incumbent Supplier</p> <p>Provided that any action undertaken under this clause shall be without prejudice to filing of dispute of involved parties with the Energy Regulatory Commission.</p> <p>3.2.3.7 Within two (2) working days from the GEOP End-User's action relative to</p>		

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 87 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p><u>Utility or Network Service Provider covering the end-user, or in case the end-user enrolls in dual billing, the end-user has entered into a Wheeling Services Agreement with the Distribution Utility.</u></p> <p><u>3.2.3.4 Relative to the condition for switch under Clause 3.2.3.a of this manual, the GEOP End-User may submit a request for certification of no outstanding balance from its Network Service Provider, for initial switch, or from its incumbent Supplier, for regular switch, at least fourteen (14) working days prior to the proposed effective switch date and furnish a copy of the request to the Central Registration Body and the prospective</u></p>		<p>Agreement for Sale of Electric Energy which is effective until the termination of contract due. This will be replaced by the Connection Agreement, which has no commercial terms and conditions. Regarding proposed Section 3.2.3.7, if the Certification (under item a) is to be issued separately as proposed, may we suggest for IEMOP to issue prescribed template for uniformity. Comments on the template should first be solicited so that it can consider inputs from relevant market participants. For item (b), we recommend that the Settlement Agreement should be between the Retail Customer and NSP/incumbent supplier only. Thus, there is no need to include this in the market manuals. The execution and conditions of such agreement shall be indicated in the Certification issued by NSP/incumbent supplier to prospective Supplier. We reiterate our detailed discussion on this item in our general comment.</p>	<p>clause 2.7, the Network Service Provider or the incumbent Supplier shall sign a certification of no outstanding balance and provide the same to the GEOP End-User. The GEOP End-User shall furnish a copy of the certification to the new Supplier.:</p> <p>a) Sign the certification of no outstanding balance and provide the same to the GEOP End-User and the new Supplier; or</p> <p>b) Execute a valid settlement agreement with the GEOP End-User and provide a copy to the new Supplier.</p>		

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 88 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <i>(in bold red underlined font)</i>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p><u>Renewable Energy Supplier.</u></p> <p><u>3.2.3.5 The Network Service Provider or the incumbent Supplier shall notify the GEOP End-User of any unpaid balance within two (2) working days from receipt of the GEOP End-User's request and furnish a copy of the notice to the Central Registration Body and the prospective Renewable Energy Supplier.</u></p> <p><u>3.2.3.6 Within two (2) working days from receipt of the Network Service Provider or the incumbent Supplier's notice, the GEOP End-User shall:</u></p> <ul style="list-style-type: none"> <u>a) Settle the unpaid balance with the Network Service Provider or the incumbent Supplier; or</u> <u>b) Initiate a settlement agreement with the Network Service Provider</u> 					

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 89 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p><u>or the incumbent Supplier</u></p> <p><u>Provided that any action undertaken under this clause shall be without prejudice to filing of dispute of involved parties with the Energy Regulatory Commission.</u></p> <p><u>3.2.3.7 Within two (2) working days from the GEOP End-User's action relative to clause 2.7, the Network Service Provider or the incumbent Supplier shall:</u></p> <p><u>a) Sign the certification of no outstanding balance and provide the same to the GEOP End-User and the new Supplier;</u></p> <p><u>or</u></p> <p><u>b) Execute a valid settlement agreement with the GEOP End-User and provide a copy to the new Supplier.</u></p>					

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 90 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (<u>in bold red underlined font</u>)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
CUSTOMER TRANSFER	3	<p><u>3.3.1 A Renewable Energy Supplier may submit a switch request to the Central Registration Body if all of the following conditions are met:</u></p> <p><u>the end-user has settled its financial obligations with its Distribution Utility, if the end-user is switching from a Distribution Utility, or its incumbent Supplier;</u></p> <p><u>the end-user has entered into a GEOP Supply Contract with a Renewable Energy Supplier;</u></p> <p><u>the end-user has entered into a valid Metering Services Agreement with</u></p>	<p>3.3.1 A Renewable Energy Supplier may submit a switch request to the Central Registration Body if all of the following conditions are met:</p> <p>the end-user has settled its financial obligations with its Distribution Utility, if the end-user is switching from a Distribution Utility, or its incumbent Supplier;</p> <p>the end-user has entered into a GEOP Supply Contract with a Renewable Energy Supplier;</p>	Transferred original clause 3.3.1 to clause 3.2.3 of Section 3.2 for consistency with the format used in the Retail Rules and Retail Manual on Market Transaction Procedures.				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 91 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p>a <u>registered Retail Metering Services Provider</u>; and</p> <p>if applicable, the <u>Renewable Energy Supplier</u> has entered into a valid <u>Wheeling Services Agreement</u> with the <u>Distribution Utility</u> or <u>Network Service Provider</u> covering the end-user, or in case the end-user enrolls in dual billing, the end-user has entered into a <u>Wheeling Services Agreement</u> with the <u>Distribution Utility</u>.</p>	<p>the end-user has entered into a valid Metering Services Agreement with a registered Retail Metering Services Provider; and</p> <p>if applicable, the Renewable Energy Supplier has entered into a valid Wheeling Services Agreement with the Distribution Utility or Network Service Provider covering the end-user, or</p>					

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 92 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<u>in case the end-user enrolls in dual billing, the end-user has entered into a Wheeling Services Agreement with the Distribution Utility.</u>					
		<u>3.3.2 Once all the conditions set forth in Clause 3.3.1 are met, the new Renewable Energy Supplier shall submit the switch request to the Central Registration Body, copy furnished its Network Service Provider, not later than seven (7) working days prior to the proposed switch effective date.</u>	3.3.2 <u>3.3.1 Once all the conditions set forth in Clause 3.2.3 are met, the new Renewable Energy Supplier shall submit the switch request to the Central Registration Body, copy furnished its Network Service Provider, not later than seven (7) working days prior to the proposed switch effective date.</u>	Renumbering due to changes in previous clauses				
CUSTOMER TRANSFER	3			Note: The Retail Manual on Green				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 93 of 124

Retail Manual on Green Energy Option Program Procedures									
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (<u>in bold red underlined font</u>)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement	
		<p><u>3.3.3 The switch request submitted under Section 3.3.2 shall be electronically filled out and shall include a confirmation by the authorized representatives of the following:</u></p> <p><u>the end-user has settled its financial obligations with the Distribution Utility or incumbent Supplier</u></p> <p><u>the Renewable Energy Supplier and the end-user on the existence of a GEOP Supply Contract between said parties, including the term and effectivity date of the GEOP Supply Contract;</u></p>	<p>3.3.3 <u>3.3.2 The switch request submitted under Section 3.3.2 3.3.1 shall be electronically filled out and shall include a confirmation by the authorized representatives of the following:</u></p> <p>a. the end-user has settled its financial obligations with the Distribution Utility or incumbent Supplier</p> <p><u>a. b. the Renewable Energy Supplier and the end-user on the existence of a GEOP Supply Contract</u></p>	<p>Energy Option Program Procedures governs transactions between Renewable Energy Suppliers and GEOP End-Users as defined in Chapter 1.2 of the manual.</p> <p>The proposed amendments aim to provide other options for the new Renewable Energy Supplier and the GEOP End-User to fulfill the switch condition under Clause 3.2.3.a aside from submission of a certification of no outstanding balance.</p> <p>Thus, the proposed amendments allow the CRB to</p>					

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 94 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (in bold red underlined font)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p><u>the Renewable Energy Supplier and the relevant Distribution Utility or Network Service Provider on the existence of a valid wheeling service agreement covering the end-user;</u></p> <p>d. <u>the end-user and the registered Retail Metering Services Provider on the existence of a valid metering services agreement covering the end-user.</u></p> <p><u>The Central Registration Body may require submission of appropriate</u></p>	<p><u>between said parties, including the term and effectivity date of the GEOP Supply Contract;</u></p> <p>b. e. <u>the Renewable Energy Supplier and the relevant Distribution Utility or Network Service Provider on the existence of a valid wheeling service agreement covering the end-user;</u></p> <p>c. d. <u>the end-user and the</u></p>	<p>provisionally accept a signed undertaking by the GEOP End-User during the submission of the switch request which shall be subject to confirmation by the Network Service Provider or the incumbent Supplier prior to the proposed switch date. This way, the new Renewable Energy Supplier and GEOP End-User will not be unreasonably prevented from submitting a switch request while the Network Service Provider or incumbent Supplier still has the opportunity to contest switching of Customers with unpaid balances in a timely manner.</p>				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 95 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <i>(in bold red underlined font)</i>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p><u>documentation to ensure the authorized representatives have authority to represent their respective organizations.</u></p> <p><u>In view of the need for enhancements to the Central Registration and Settlement System (CRSS) to implement electronic-based switching process, it is understood that the electronic-based switching shall take effect no later than fifteen (15) days from the date of issuance of the audit software certificate of the system enhancements.</u></p>	<p><u>registered Retail Metering Services Provider on the existence of a valid metering services agreement covering the end-user.</u></p> <p><u>Relative to the condition for switch under Clause 3.2.3.a of this manual, the new Renewable Energy Supplier shall also submit either of the following seven (7) working days prior to the proposed effective date:</u></p> <p>a) <u>Certification that the GEOP End-User has no outstanding balance signed by the Network Service Provider or incumbent Supplier:</u></p>		<p>PEMC:</p> <p>Same comments with Section 3.2.2.1 of Retail Rules</p>			

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 96 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <u>(in bold red underlined font)</u>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			b) <u>Copy of valid settlement agreement signed by the GEOP End-User and the Network Service Provider or incumbent Supplier; or</u> c) <u>Undertaking signed by the GEOP End-User that it has no outstanding balance with the Network Service Provider or incumbent Supplier, provided that the Network Service Provider or incumbent Supplier shall provide confirmation of such undertaking to the Central Registration Body three (3) working days prior to the proposed switch date.</u>					
					MERALCO: Considering that actual settlement of obligations is required under regulations, and given elucidation thereon in previous comments, these cannot be deemed alternative requirements. Instead, it is respectfully submitted that (a) would suffice as only plausible proof (among these three options proposed) of customer's settlement of obligations.	MERALCO: Relative to the condition for switch under Clause 3.2.3.a of this manual, the new Renewable Energy Supplier shall also submit a <u>Certification that the GEOP End-User has no outstanding balance signed by the Network Service Provider or incumbent Supplier either of the following seven (7) working days prior to the</u>	Same response to PEMC's comment on Section 3.2.2.1 of the Retail Rules. Same response to MERALCO's comment on Section 3.2.2.1 of the Retail Rules.	

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 97 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <i>(in bold red underlined font)</i>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p><u>The Central Registration Body may require submission of appropriate documentation to ensure the authorized representatives have authority to represent their respective organizations.</u></p> <p><u>In view of the need for enhancements to the Central Registration and Settlement System (CRSS) to implement electronic-based switching process, it is understood that the electronic-based switching shall take effect no later than fifteen (15) days from the date of issuance of the audit software certificate of the system enhancements.</u></p>			<p>proposed effective date:</p> <p>a) Certification that the GEOP End-User has no outstanding balance signed by the Network Service Provider or incumbent Supplier;</p> <p>b) Copy of valid settlement agreement signed by the GEOP End-User and the Network Service Provider or incumbent Supplier; or</p> <p>c) Undertaking signed by the GEOP End-User that it has no outstanding balance with the Network Service Provider or incumbent Supplier, provided that the Network Service Provider or incumbent Supplier shall provide confirmation of such undertaking to the Central Registration Body three (3) working days prior to</p>		

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 98 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <i>(in bold red underlined font)</i>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
						<i>the proposed switch date.</i>		
CUSTOMER TRANSFER	3	<p><u>3.3.4 In addition to the attestations in Section 3.3.3, the Renewable Energy Supplier shall submit the following documentary requirements set in Section 16.2 under ERC Resolution No. 08, Series of 2021:</u></p> <p><u>Switch Request Form;</u></p> <p><u>Copy of Renewable Energy Supply Contract;</u></p> <p><u>Copy of valid Wheeling Service Agreement;</u></p> <p><u>Copy of valid Metering Services Agreement;</u></p>	<p>3.3.4 <u>3.3.3 In addition to the attestations in Section 3.3.3, the Renewable Energy Supplier shall submit the following documentary requirements set in Section 16.2 under ERC Resolution No. 08, Series of 2021:</u></p> <p><u>Switch Request Form;</u></p> <p><u>Copy of Renewable Energy Supply Contract;</u></p> <p><u>Copy of valid Wheeling Service Agreement;</u></p> <p><u>Copy of valid Metering Services Agreement;</u></p> <p><u>Connection Agreement between a GEOP</u></p>	Renumbering due to changes in previous clauses				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 99 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <i>(in bold red underlined font)</i>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<u>Connection Agreement between a GEOP End-User and its Network Service Provider; Prudential Requirements; and A verification executed by the Renewable Energy Supplier stating that the above-enumerated documents are authentic, and the contents thereof are true and correct.</u>	<u>End-User and its Network Service Provider; Prudential Requirements; and A verification executed by the Renewable Energy Supplier stating that the above-enumerated documents are authentic, and the contents thereof are true and correct.</u>					
CUSTOMER TRANSFER	3	<u>3.3.5 Upon receipt of a switch request, the Central Registration</u>	3.3.5 <u>3.3.4 Upon receipt of a switch request, the Central Registration Body</u>	Renumbering due to changes in previous clauses				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 100 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <i>(in bold red underlined font)</i>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<u>Body shall immediately evaluate the completeness of the requirements under Clause 3.3.3. The Central Registration Body shall notify the Renewable Energy Supplier and the GEOP End-User, of any deficiencies, if any, within two (2) working days from its receipt of the switch request.</u>	<u>shall immediately evaluate the completeness of the requirements under Clause 3.3.3. 3.3.2. The Central Registration Body shall notify the Renewable Energy Supplier and the GEOP End-User, of any deficiencies, if any, within two (2) working days from its receipt of the switch request.</u>					
CUSTOMER TRANSFER	3	<u>3.3.6 All deficiencies, except those relating to metering requirements, in the switch request submission shall be completed by the Renewable Energy Supplier and the GEOP End-User within two (2) working days from the receipt of the Central Registration Body's notice. Thereafter, the Central Registration Body shall complete its</u>	<u>3.3.6 3.3.5 All deficiencies, except those relating to metering requirements, in the switch request submission shall be completed by the Renewable Energy Supplier and the GEOP End-User within two (2) working days from the receipt of the Central Registration Body</u>	Renumbering due to changes in previous clauses				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 101 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <i>(in bold red underlined font)</i>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<u>evaluation no more than two (2) business days from receipt of the complete submissions. The aforementioned procedure shall likewise apply to regular switching from one Renewable Energy Supplier to another.</u>	<u>shall complete its evaluation no more than two (2) business days from receipt of the complete submissions. The aforementioned procedure shall likewise apply to regular switching from one Renewable Energy Supplier to another.</u>					
CUSTOMER TRANSFER	3	<u>3.3.7 If the deficiency pertains to the metering requirements, the relevant Retail Metering Services Provider shall complete the requirements within fifteen (15) working days from its receipt of notice.</u> <u>For cases which requires scheduling of service interruption on the part of the GEOP End-User, the completion will be based on the agreed date of execution with the GEOP End-User.</u>	3.3.7 <u>3.3.6</u> <u>If the deficiency pertains to the metering requirements, the relevant Retail Metering Services Provider shall complete the requirements within fifteen (15) working days from its receipt of notice.</u> <u>For cases which requires scheduling of service interruption on the part of the GEOP End-User, the completion will be based on the agreed date of execution with the GEOP End-User.</u>	Renumbering due to changes in previous clauses				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 102 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <i>(in bold red underlined font)</i>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
CUSTOMER TRANSFER	3	<u>3.3.8 If the Central Registration Body determines that the GEOP End-User has incomplete customer information as required under Section 2.5.2 of this Manual, the Central Registration Body shall notify the relevant Network Service Provider to provide the necessary information within two (2) working days from the receipt of the notification.</u>	3.3.8 3.3.7 <u>If the Central Registration Body determines that the GEOP End-User has incomplete customer information as required under Section 2.5.2 of this Manual, the Central Registration Body shall notify the relevant Network Service Provider to provide the necessary information within two (2) working days from the receipt of the notification.</u>	Renumbering due to changes in previous clauses				
CUSTOMER TRANSFER	3	<u>3.3.9 If the deficiencies in the application or requirements are not rectified within the prescribed timeframes, the Central Registration Body shall notify the Renewable Energy Supplier, the incumbent Supplier and the Distribution Utility or Network Service Provider, within three (3)</u>	3.3.9 3.3.8 <u>If the deficiencies in the application or requirements are not rectified within the prescribed timeframes, the Central Registration Body shall notify the Renewable Energy Supplier, the incumbent Supplier and the Distribution Utility or Network Service Provider,</u>	Renumbering due to changes in previous clauses				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 103 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment <i>(in bold red underlined font)</i>	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<u>working days that the processing of the switch request shall not proceed. Such notification is without prejudice to refiling of a new request, provided all conditions will be met by the Renewable Energy Supplier and/or party required to comply.</u>	<u>within three (3) working days that the processing of the switch request shall not proceed. Such notification is without prejudice to refiling of a new request, provided all conditions will be met by the Renewable Energy Supplier and/or party required to comply.</u>					
CUSTOMER TRANSFER	3	<u>3.3.10 Within two (2) working days from its confirmation that the prudential requirements, metering requirements, and customer information requirements are satisfied, the Central Registration Body shall approve the switch request and shall notify the following of the confirmation of the switch request, including the effective date of the switch:</u>	3.3.10 <u>3.3.9 Within two (2) working days from its confirmation that the prudential requirements, metering requirements, and customer information requirements are satisfied, the Central Registration Body shall approve the switch request and shall notify the following of the confirmation of the switch request, including the effective date of the switch:</u>	Renumbering due to changes in previous clauses				

MEETING MINUTES

Annex E Matrix of Proposed Amendments on Proposal regarding Certification of No Outstanding Balance
 Page 104 of 124

Retail Manual on Green Energy Option Program Procedures								
Title	Section	RCC & PEM Board-approved General Amendments (RCC Reso. No. 2022-07)	Proposed Amendment (<u>in bold red underlined font</u>)	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p>a) <u>new Renewable Energy Supplier,</u></p> <p>b) <u>the incumbent Supplier or Distribution Utility, as applicable;</u></p> <p>c) <u>the Retail Metering Services Provider,</u></p> <p>d) <u>the relevant Distribution Utility or Network Service Provider, and</u></p> <p>e) <u>GEOP End-User.</u></p>	<p>a) <u>new Renewable Energy Supplier,</u></p> <p>b) <u>the incumbent Supplier or Distribution Utility, as applicable;</u></p> <p>c) <u>the Retail Metering Services Provider,</u></p> <p>d) <u>the relevant Distribution Utility or Network Service Provider, and</u></p> <p>e) <u>GEOP End-User.</u></p>					
CUSTOMER TRANSFER	3	<p><u>3.3.11 If the approved switch request is for the supply of a Renewable Energy Supplier to an end-user from a Network Service Provider, the Central Registration Body shall register the end-user as a GEOP End-User.</u></p>	<p>3.3.11 3.3.10 <u>If the approved switch request is for the supply of a Renewable Energy Supplier to an end-user from a Network Service Provider, the Central Registration Body shall register the end-user as a GEOP End-User.</u></p>	Renumbering due to changes in previous clauses				

MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 105 of 124



Allowable Timeframes for Submission of Claims for Additional Compensation

Presentation to the WESM Rules Change Committee
October 21, 2022

DEPARTMENT CIRCULAR NO. DC2022-06-0025

ADOPTING FURTHER AMENDMENTS TO THE WHOLESALE ELECTRICITY SPOT MARKET (WESM) MARKET MANUAL ON BILLING AND SETTLEMENT

(Provisions on Additional Compensation Process)

10.2.1 *Trading Participants* shall submit the written claim for additional compensation within the allowable timeframe and basis of computation, as follows:

- a) *Market suspension or market intervention* – not later than fourteen (14) working days after the issuance of the WESM final statement bill and settlement data.
- b) *Must-run unit or constrain-on generating unit* – within one (1) year from the time the affected *Trading Participant* complied with dispatch instructions as *must-run unit or constrain-on generating unit*,
- c) *Constrained-on generators in dispatch intervals* when the price substitution methodology due to congestion was applied – not later than fourteen (14) working days after the issuance of the WESM final statement bill and settlement data.
- d) *Qualified Trading Participants in dispatch intervals* when price mitigation measure was applied – not later than fourteen (14) working days after the issuance of the WESM final statement bill and settlement data.

Any claims not filed within such period shall be deemed waived.

Note: Date of Publication: August 12, 2022
Date of Effectivity: August 27, 2022

MEETING MINUTES

Annex F Presentation of MEI/PEI
 Page 106 of 124

WESM Manual
Billing and Settlement
 Issue 11.1 | WESM-BSM

10.2.1 *Trading Participants* shall submit the written claim for additional compensation within the allowable timeframe and basis of computation, as follows:

- a) *Market suspension or market intervention* – not later than fourteen (14) *working days* after the issuance of the WESM final statement bill and settlement data;
- b) *Must-run unit or constrain-on generating unit* – within one (1) year from the time the affected *Trading Participant* complied with *dispatch instructions as must-run unit or constrain-on generating unit*;
- c) *Constrained-on generators in dispatch intervals* when the price substitution methodology due to congestion was applied – not later than fourteen (14) *working days* after the issuance of the WESM final statement bill and settlement data;
- d) *Qualified Trading Participants in dispatch intervals* when price mitigation measure was applied – not later than fourteen (14) *working days* after the issuance of the WESM final statement bill and settlement data.

Any claims not filed within such period shall be deemed waived.

Note: Date of Publication: August 12, 2022
 Date of Effectivity: August 27, 2022

[24 August 2022 Advisory on Energy Regulatory Commission's Guidelines on Claims for Additional Compensation]

Issued before effectivity of DOE DC2022-06-0025

Dear Market Participants:

This is to inform you that in its Letter dated 18 July 2022, the Energy Regulatory Commission (ERC) issued further guidelines on the filing of additional compensation which allows oil-based, natural gas, coal and geothermal plants to file applications to recover additional compensation for the trading intervals where the cumulative price threshold (CPT) has been breached and the price cap is in effect.

The claims for additional compensation shall be filed in accordance with the requirements, processes, timelines, and other provisions of the ERC Decision in ERC Case No. 2017-042 RC on the Price Determination Methodology and the WESM Manual on Billing and Settlement.

For natural gas, coal and geothermal power plants, please be reminded to observe the following timelines for filing of claims arising from imposition of secondary price cap:

Covered Period	Deadline for Filing of Claim
18 July 2022 to 23 August 2022	13 September 2022
24 August 2022 onwards	within fourteen (14) working days after the imposition of the secondary price cap has been lifted

Inconsistency in the timeframes for submission of claims for additional compensation

Oil-based plants are expected to have filed their claims for secondary price cap imposition on 18 July 2022 onwards following the prescribed schedule. Thus, the extension of the deadline stated above shall not apply.

For the filing of your claims, please fill-out the attached Notice of Claims template and submit the same on or before the deadline via the following modes:

Electronic filing : accounts.management@iemop.ph.
Personal/Courier : Independent Electricity Market Operator of the Philippines Inc., 9th Floor, Robinsons Equitable Tower, ADB Avenue, Ortigas Center, Pasig City, Philippines 1600

Please note that for purposes of evaluating the timeliness of your filing, IEMOP shall refer to the actual date of its receipt of notice of claim.

For your reference, a copy of the ERC Letter dated 18 July 2022 is herein attached and is also available in IEMOP's Website and may be downloaded via: [insert link upon upload].

Should you have request for clarification or concern regarding this matter, you may contact us at 5318-9376 local nos. 272, 353 and 320 or send us an email at accounts.management@iemop.ph.

Thank you.

IEMOP

MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 107 of 124



18 July 2022

Issued before effectivity of DOE DC2022-06-0025

ATTY. LEONIDO J. PULIDO
President
Philippine Electricity Market Corporation
18th Floor, Robinsons Equitable Tower
ADB Avenue, Ortigas Center, Pasig City

The Commission hereby issues the following guidelines:

- 1) During the period where the CPT has been breached and the price cap is in effect, oil-based, natural gas, coal, and geothermal plants will be allowed to file applications to recover additional compensation in accordance with the requirements, processes, timelines, and other provisions of the Commission's *Decision* on ERC Case No. 2017-042 RC on the Price Determination Methodology, as well as with WESM Billing and Settlement Manual;

End of Presentation
Thank you

MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 108 of 124



Required Documents in Filing Claims for Additional Compensation

Presentation to the WESM Rules Change Committee
October 21, 2022

Non-Exhaustive List of Documents

ERC Decision on ERC Case No. 2017 -042RC (PDM)	Billing and Settlement Manual Issue 11.1
<u>Must Run Unit/Administered Price/Constrained Plants</u> 1. Certified correct fuel consumption and inventory report 2. Purchase invoices, official receipts and other supporting documents 3. Commission-approved rate, or list of variable O&M costs supported by photocopies of invoices/receipts	<u>Must Run Unit/Administered Price/Constrained Plants</u> 1. Certified correct Fuel Consumption and Inventory Report 2. Purchase Invoices, Official Receipts and other supporting documents 3. ERC approved rate or List of Variable Operation and Maintenance Costs supported by photocopies of invoices/receipts
<u>Secondary Price Mechanism/Constrained-on Plants</u> 1. Actual fuel consumption and inventory report, duly certified by the Vice President of Finance of the power plant applying for additional compensation 2. Purchase invoices, official receipts and other supporting documents 3. List of variable O&M costs supported by photocopies of invoices/receipts	<u>Secondary Price Mechanism/Constrained-on Plants</u> 1. Actual fuel consumption and inventory report duly certified by the Vice President of Finance of the power plant applying for additional compensation 2. Purchase Invoices, Official Receipts and other supporting documents 3. List of Variable Operation and Maintenance Costs supported by photocopies of invoice/receipts

MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 109 of 124

Republic of the Philippines
ENERGY REGULATORY COMMISSION
San Miguel Avenue, Pasig City



RESOLUTION NO. 08, Series of 2014

**AN URGENT RESOLUTION SETTING AN INTERIM MITIGATING MEASURE
IN THE WHOLESALE ELECTRICITY SPOT MARKET**

2. During the period at which time the secondary cap is in effect, oil-based plants are entitled to recover additional compensation equal to the remainder of the total cost of fuel and variable Operations & Maintenance (O&M) cost to be determined by the Philippine Electricity Market Corporation (PEMC) and sufficient proof that the secondary cap is not sufficient to cover the fuel cost and variable O&M of the plant;

Republic of the Philippines
ENERGY REGULATORY COMMISSION
San Miguel Avenue, Pasig City



RESOLUTION NO. 20, Series of 2014

**A RESOLUTION ADOPTING AND ESTABLISHING A
PRE-EMPTIVE MITIGATION MEASURE IN THE
WHOLESALE ELECTRICITY SPOT MARKET (WESM)**

2. During the period where the CPT has been breached and the price cap is in effect, the oil-based plants will be entitled to recover additional compensation equivalent to the remainder of the total cost of fuel and variable Operations & Maintenance (O&M) costs, upon submission of sufficient proof that the application of the pre-emptive mitigation measure is not sufficient to cover the fuel cost and variable O&M costs of the plant, to be evaluated and confirmed by the Philippine Electricity Market Corporation (PEMC); and

MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 110 of 124

WESM Manual

Administered Price Determination Methodology Issue 6.0

APPENDIX B. NON-EXHAUSTIVE LIST OF REQUIRED DOCUMENTS IN FILING CLAIMS FOR ADDITIONAL COMPENSATION

1. Certified correct Fuel Consumption and Inventory Report
2. Purchases Invoices, Official Receipts and other supporting documents
3. ERC approved rate or List of Variable Operation and Maintenance Costs supported by photocopies of invoices/receipts

WESM Manual

Management of Must-Run And Must-Stop Units Issue 8.0

APPENDIX B. Non-Exhaustive List of Required Documents in Filing Claims for Additional Compensation

1. Certified correct Fuel Consumption and Inventory Report
2. Purchase Invoices, Official Receipts and other supporting documents
3. ERC approved rate or List of Variable Operation and Maintenance Costs supported by photocopies of invoices/receipts

MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 111 of 124



Republic of the Philippines
DEPARTMENT OF ENERGY

DEPARTMENT CIRCULAR NO. DC 2018 - 04 - 0008 #

ADOPTING FURTHER AMENDMENTS TO THE WHOLESALE ELECTRICITY SPOT MARKET (WESM) MARKET MANUALS ON BILLING AND SETTLEMENT AND LOAD FORECASTING METHODOLOGY FOR THE IMPLEMENTATION OF ENHANCEMENTS TO WESM DESIGN AND OPERATIONS

10.2.2 Trading Participants shall submit sufficient proof regarding the costs incurred, which are limited to fuel cost and variable operating and maintenance costs, which may include start-up and shut down cost. Below is the non-exhaustive list of requirement documents in filing claims for additional compensation:

- a. Certified correct Fuel Consumption and Inventory Report;
- b. Purchase Invoices, Official Receipts and other supporting documents; and
- c. ERC approved rate or List of Variable Operation and Maintenance Costs supported by photocopies of invoices/receipts.

Points to Consider

- The variable Operation and Maintenance costs of a generator are more or less the same regardless of the type of market event that caused the need for filing of additional compensation.
- For claims due to SPM and PSM, a generator may not be able to fully recover its costs in complying with the dispatch instruction.
- There is a need to harmonize the non -exhaustive list of documents required in filing for additional compensation.

MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 112 of 124

**End of Presentation
Thank you**



**Non-tagging of Constrained -on Generators during
Network Congestion/PSM event**

Merit Order Table – Tagging Units for MOT Lower

**Presentation to the WESM Rules Change Committee
October 21, 2022**

MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 113 of 124

MARKET ADVISORY: Filing of Claims for Additional Compensation

CATEGORY	DEADLINE FOR FILING	REFERENCE
Must-Run Unit (MRU)	One (1) year from the time the affected Trading Participant complied with dispatch instructions as MRU	WESM Manual – Billing and Settlement Issue (Section 10.2.1) Billing and Settlement Manual
Administered Price (AP) during market intervention or suspension	Fourteen (14) working days after resumption of the market	WESM Manual – Billing and Settlement Issue (Section 10.2.1) Billing and Settlement Manual
Secondary Price Cap (SPC) *Oil-based power plants *Coal, geothermal and natural gas power plants	Fourteen (14) working days after the imposition of the secondary price cap has been lifted	WESM Manual – Billing and Settlement Issue (Section 10.2.1) Billing and Settlement Manual in relation to ERC Directive issued on 18 July 2022 and circulated in IEMOP Advisory accessible via Advisory dated 24 August 2022
Constrained-On Unit during Price Substitution Methodology (PSM)	Fourteen (14) working days after the trading day when the generating unit was constrained on	WESM Manual – Billing and Settlement Issue (Section 10.2.1) Billing and Settlement Manual
Constrain-On Unit under Merit Order Table (MOT)	One (1) year from the time the affected Trading Participant complied with dispatch instructions by the System Operator	WESM Manual – Billing and Settlement Issue (Section 10.2.1) Billing and Settlement Manual

- Publication of Report is after a week of such tagged on Constrained-On or MOT Raise and Dispatch Instruction Report.
- It is very critical that the PSM report or Dispatch Instruction Report (DIR) coming System Operator (SO) & then published by Market within the allowable period, which includes the Trading Participant (TP) to request with SO & MO to re-update the report if found to have variance with Plant records, in order for the Claim be acknowledge by MO Billing for accounting such claim Since the basis of claim is based on the proper tagging of the units based on the Real time Dispatch request by SO to the TP.
- If No tagging or manifestation of report that TP is not included thus the TP has no merit on the claim

Claims for additional compensation for **AP, SEC and PSM** must be filed on or before the respective deadlines. For **MRU** and **MOT**, IEMOP encourages the Market Participants to file their claim/s for additional compensation as soon as possible. **Any claim not filed within such period shall be deemed waived.**

When Unit were tagged as SEC, MRU, AP, PSM (Constrained-On) or MOT Raise

$$(GSEQ \text{ or } MQ) > \Sigma BCQ - \Sigma AS \text{ Energy}$$

$$\text{Additional Compensation Volume} = (GSEQ \text{ or } MQ) - BCQ - AS \text{ Energy}$$

$$\text{Additional Compensation Volume} = (GSEQ = MQ) - BCQ - AS \text{ Energy}$$

$$\text{Additional Compensation Volume} = MQ - AS \text{ Energy}$$

- Unit/s were tagged in Plant record as Constrain-On or MOT raised based on the following:
 - MOT-Raise DUE TO emergency shutdown of Based Load plants
 - MOT-Raise DUE TO HIGH SYSTEM DEMAND (Low System Frequency)
 - System Requirement (due to shutdown of Based Load plants ahead of time)
 - MOT Constrain on due to Forecast Error, HVDC variance , All CR & DR are exhausted
- Unit/s were tagged in Plant record as Constrained-On based on the following:
 - Constrained-On due to Network Congestion

Units that was found to be in MOT raised & PSM that was not claimed when

- Implementation of AP, SEC, MRU
- Resulting to High Prices of FEDP
- Metered Quantity = to AS Energy

MEETING MINUTES

Annex F Presentation of MEI/PEI
 Page 116 of 124

When Unit were tagged as ConstrainOff or MOT Lower/ Security Limit Lower

Unit/s were tagged in Plant record as Constrain-Off or MOT Lower based on the following:

- MOT-Lower DUE TO emergency shutdown or tripping of Kalayaan as Pump
- MOT-Lower DUE TO LOWER SYSTEM DEMAND (High System Frequency)
- MOT for shutdown due to low intra hour system demand
- MOT Constrain off due to Forecast Error, HVDC variance
- MOT Lower or Security Limit Lower due to limit of NGCP transmission line (e.g. Hermosa–Mexico 230kv Line 1 & 2)

Units that was found to be in MOT lower that was not claimed when

- Implementation of SEC, AP, MRU
- Resulting to High Prices of FEDP
- Metered Quantity = to AS Energy

• Summary of Limay Units that was Ordered by SO for MOT Lower

UNIT	BILLING DAY	DAY	YEAR	BILLING PERIOD	BILLING MONTH	DELIVERY DAY	DELIVERY DATE	INTERVAL	TIME INTERVAL	FROM (M/W)	TO (M/W)	REMARKS	Start Time (XXXXH)	End Time (XXXXH)	Duration (No. of Hours)	PCR	LMP	FEDP	REMARKS2	
01LIMAY_U01	Dec 19H	Thursd	2021	186 Dec 202	Dec	12/02/202	12/02/202	19	12/02/202 18:05							SEC	31,792.8	6,245.00		
01LIMAY_U01 Dec 02, 202 Thursd 19H ay 2021 186 Dec 202 Dec 12/02/202 12/02/202: 19										12/02/202: 18:10						SEC	30,454.4	6,245.00		
01LIMAY_U01	Dec 19H	Thursd	2021	186 Dec 202	Dec	12/02/202	12/02/202	19	12/02/202 18:15							SEC	14,971.0	6,245.00		
01LIMAY_U01 Dec 02, 202 Thursd 19H ay 2021 186 Dec 202 Dec 12/02/202 12/02/202: 19										12/02/202: 18:20						SEC	12,248.1	6,245.00		
01LIMAY_U01	Dec 19H	Thursd	2021	186 Dec 202	Dec	12/02/202	12/02/202	19	12/02/202 18:25							SEC	30,476.8	6,245.00		
01LIMAY_U01 Dec 02, 202 Thursd 19H ay 2021 186 Dec 202 Dec 12/02/202 12/02/202: 19										12/02/202: 18:30						PEN	22,952.9	12,204.62		
01LIMAY_U01	Dec 19H	Thursd	2021	186 Dec 202	Dec	12/02/202	12/02/202	19	12/02/202 18:35							PEN	14,857.4	12,119.0		
01LIMAY_U01 Dec 02, 202 Thursd 19H ay 2021 186 Dec 202 Dec 12/02/202 12/02/202: 19										12/02/202: 18:40	58.6	40	MOT-OFF due to Load Actual System Demand	1840H	1840H	0	PEN	14,857.4	12,131.55	Filed for MOT
01LIMAY_U01	Dec 19H	Thursd	2021	186 Dec 202	Dec	12/02/202	12/02/202	19	12/02/202 18:45	58.6	40	MOT-OFF due to Load Actual System Demand	1840H	1845H	0.083333333	OK	12,213.3	12,213.3	Filed for MOT	
01LIMAY_U01 Dec 02, 202 Thursd 19H ay 2021 186 Dec 202 Dec 12/02/202 12/02/202: 19										12/02/202: 18:50	58.6	40	MOT-OFF due to Load Actual System Demand	1845H	1850H	0.083333333	OK	12,231.8	12,231.88	Filed for MOT

MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 117 of 124

UNIT	DELIVERY DATE MM/DD/YYYY	FROM (MW)	TO (MW)	REMARKS	Start Time	End Time (XXXXH)
01LIMAY_U01	12/02/2021	58.6	40	MOT-OFF due to Load Actual System Demand	1840H	1850H

Excel interface showing a spreadsheet with the following data:

A	B	C	D	E	F
Luzon System Operations					
01LIMAY_U01	LOWER LOAD	12/02/2021 18:37	59	40	MOT LOWER
					Lower load due to low actual system demand.

UNIT	DELIVERY DATE MM/DD/YYYY	FROM (MW)	TO (MW)	REMARKS	Start Time	End Time (XXXXH)
01LIMAY_U01	03/24/2022	25.7	5	MOT - Forecast Error	1411H	1415H
01LIMAY_U07	03/24/2022	11.8	5	MOT - Forecast Error	1411H	1415H

Handwritten notes on lined paper:

1411H RFD L1 -> MOT due to Forecast Error -
 L7 - Eroscdo -
 L1 MOT : 5mw - Eroscdo - 9.8mw
 1415H As per Eroscdo MOT lifted to follow RFD
 L1 RFD int 1420H : 13.2mw - 8.0

Excel interface showing a spreadsheet with the following data:

UNIT	INSTRUCTION	INSTRUCTION_TIN	MW_ERC	MW_1	CATEGORY	REMARKS
01LIMAY_U01	LOWER LOAD	03/24/2022 14:12	26	5	MOT LOWER	Constrained-OFF due to synchronization of Sual 1, frequency at 60.306Hz
01LIMAY_U07	LOWER LOAD	03/24/2022 14:12	32	5	MOT LOWER	Constrained-OFF due to synchronization of Sual 1, frequency at 60.306Hz

MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 119 of 124

• Summary of Limay Units that was hard flagged by SO for Security Lower due to Line Limitation

LIMAY 5

DATE	DATE TIME	INT	MPR	LIMAY 5									
				AS	RTD	RD	RU	ALD	D-MQ	F-MQ	LMP	LMP - DIPC	
10/11/2022	10/11/2022 18:19	19	SEC	-	58.80	-	-	30.10	4.64	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 18:19	19	SEC	-	52.02	-	-	30.10	4.28	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 18:19	19	SEC	-	58.90	-	-	30.10	3.54	-	32.000.0002	6.245.0000	
10/11/2022	10/11/2022 18:19	19	SEC	-	48.10	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 19:18	18	SEC	-	45.54	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 19:20	20	SEC	-	51.81	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 19:20	20	SEC	-	38.31	-	-	30.10	2.47	-	31.996.4898	6.245.0000	
10/11/2022	10/11/2022 19:20	20	SEC	-	30.54	-	-	30.10	2.48	-	31.999.9999	6.245.0000	
10/11/2022	10/11/2022 19:20	20	SEC	-	31.21	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 19:20	20	SEC	-	35.51	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 19:20	20	SEC	-	36.64	-	-	30.10	2.47	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 19:20	20	SEC	-	36.60	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 19:20	20	SEC	-	38.81	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 19:20	20	SEC	-	40.75	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 19:20	20	SEC	-	49.61	-	-	30.10	2.47	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 19:20	20	SEC	-	46.08	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 20:20	20	SEC	-	54.92	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 20:20	21	SEC	-	53.80	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 20:20	21	SEC	-	50.22	-	-	30.10	2.47	-	31.999.9998	6.245.0000	
10/11/2022	10/11/2022 20:20	21	SEC	-	54.21	-	-	30.10	2.48	-	32.000.0002	6.245.0000	
10/11/2022	10/11/2022 20:20	21	SEC	-	55.86	-	-	30.10	2.48	-	32.000.0003	6.245.0000	
10/11/2022	10/11/2022 20:20	21	SEC	-	46.82	-	-	30.10	2.48	-	31.999.9998	6.245.0000	
10/11/2022	10/11/2022 20:20	21	SEC	-	48.94	-	-	30.10	2.47	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 20:20	21	SEC	-	52.30	-	-	30.10	2.48	-	32.000.0002	6.245.0000	
10/11/2022	10/11/2022 20:20	21	SEC	-	46.94	-	-	30.10	2.48	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 20:20	21	SEC	-	53.31	-	-	30.10	2.48	-	32.000.0002	6.245.0000	
10/11/2022	10/11/2022 20:20	21	SEC	-	48.39	-	-	30.10	2.47	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 20:20	21	SEC	-	51.51	-	-	30.10	2.48	-	32.000.0002	6.245.0000	
10/11/2022	10/11/2022 21:21	21	SEC	-	45.97	-	-	30.10	2.48	-	31.999.9998	6.245.0000	
10/11/2022	10/11/2022 21:21	22	SEC	-	59.07	-	-	30.10	2.48	-	32.010.0393	6.245.0000	
10/11/2022	10/11/2022 21:21	22	PN	-	46.60	-	-	30.10	2.47	-	32.000.0001	6.245.0000	
10/11/2022	10/11/2022 21:21	22	PN	-	60.00	-	-	30.10	2.48	-	32.009.1984	6.245.0000	
10/11/2022	10/11/2022 21:21	22	PN	-	52.55	-	-	30.10	2.48	-	32.000.0002	6.245.0000	
10/11/2022	10/11/2022 21:21	22	PN	-	51.81	-	-	30.10	2.47	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 21:21	22	PN	-	42.30	-	-	30.10	2.48	-	32.000.0001	6.245.0000	
10/11/2022	10/11/2022 21:21	22	PN	-	47.31	-	-	30.10	2.48	-	32.000.0001	6.245.0000	
10/11/2022	10/11/2022 21:21	22	PN	-	48.62	-	-	30.10	2.47	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 21:21	22	PN	-	48.60	-	-	30.10	2.48	-	32.000.0003	6.245.0000	
10/11/2022	10/11/2022 21:21	22	PN	-	43.70	-	-	30.10	2.48	-	32.000.0001	6.245.0000	
10/11/2022	10/11/2022 21:21	22	PN	-	39.20	-	-	30.10	2.48	-	32.000.0001	6.245.0000	
10/11/2022	10/11/2022 22:22	22	SEC	-	40.31	-	-	30.10	2.47	-	32.000.0001	6.245.0000	
10/11/2022	10/11/2022 22:22	23	SEC	-	40.31	-	-	-	2.48	-	32.000.0001	6.245.0000	
10/11/2022	10/11/2022 22:22	23	SEC	-	39.17	-	-	-	2.48	-	32.000.0001	6.245.0000	
10/11/2022	10/11/2022 22:22	23	SEC	-	39.70	-	-	-	2.47	-	32.000.0000	6.245.0000	
10/11/2022	10/11/2022 22:22	23	SEC	-	26.25	-	-	-	2.40	-	31.996.5151	6.245.0000	

DATE : 10/11/2022
INTERVAL : 1840H
UNIT : Limay 5
SO DISPATCHER : Balmores
INSTRUCTION TIME (START) : 1836H
FROM (MW) : 58.9MW
TO (MW) : 30MW
REMARKS : Thermal limit of transmission line (SECURITY LIMIT LOWER)

DATE : 10/11/2022
INTERVAL : 2220H
UNIT : Limay 5
SO DISPATCHER : Balmores
INSTRUCTION TIME (START) : 2217H
FROM (MW) : 15MW
TO (MW) : 26.3W
REMARKS : follow RTD (end of SECURITY LIMIT LOWER)

• Summary of Limay Units that was hard flagged by SO for Security Lower due to Line Limitation

DATE	DATE TIME	INT	MPR	LIMAY 5									
				AS	RTD	RD	RU	ALD	D-MQ	F-MQ	LMP	LMP - DIPC	
10/11/2022	10/11/2022 23:35	24	SEC	-	49.46	-	-	14.30	4.05	-	32,000.0000	6.245.0000	
10/11/2022	10/11/2022 23:40	24	SEC	-	35.96	-	-	14.30	3.47	-	31,992.3608	6.245.0000	
10/11/2022	10/11/2022 23:45	24	SEC	-	41.98	-	-	14.30	2.35	-	32,000.0000	6.245.0000	
10/11/2022	10/11/2022 23:50	24	SEC	-	35.09	-	-	14.30	1.35	-	32,000.0000	6.245.0000	
10/11/2022	10/11/2022 23:55	24	SEC	-	27.70	-	-	14.30	1.22	-	32,000.0000	6.245.0000	
10/11/2022	10/12/2022 0:00	24	SEC	-	14.20	-	-	14.30	1.18	-	31,996.5418	6.245.0000	

DATE : 10/11/2022
INTERVAL : 2335H
UNIT : Limay 5
SO DISPATCHER : Balmores
INSTRUCTION TIME (START) : 2334H
FROM (MW) : 49.5MW
TO (MW) : 15MW
REMARKS : Thermal limit of transmission line (SECURITY LIMIT LOWER)

DATE : 10/11/2022
INTERVAL : 2400H
UNIT : Limay 5
SO DISPATCHER : Balmores
INSTRUCTION TIME (START) : 2356H
FROM (MW) : 15MW
TO (MW) : 14.2MW
REMARKS : follow RTD (end of SECURITY LIMIT LOWER)



MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 120 of 124

• Summary of Limay Units that was hard flagged by SO for Security Lower due to Line Limitation LIMAY 6

DATE	DATE TIME	INT	MPR	LIMAY 6								
				AS	RTD	RD	RU	ALD	D-MQ	F-MQ	LMP	LMP - DIPC
10/11/22	10/11/2022 18:40	19	SEC		58.86			30.00	4.64		32,000.0000	6,245.0000
10/11/22	10/11/2022 18:45	19	SEC		52.02			30.00	4.23		32,000.0000	6,245.0000
10/11/22	10/11/2022 18:50	19	SEC		58.30			30.00	3.08		32,000.0002	6,245.0000
10/11/22	10/11/2022 18:55	19	SEC		48.10			30.00	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 19:00	19	SEC		45.54			30.00	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 19:05	20	SEC		51.81			29.90	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 19:10	20	SEC		38.31			29.90	2.47		31,996.4898	6,245.0000
10/11/22	10/11/2022 19:15	20	SEC		30.54			29.90	2.47		31,999.9999	6,245.0000
10/11/22	10/11/2022 19:20	20	SEC		31.21			29.90	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 19:25	20	SEC		35.51			29.90	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 19:30	20	SEC		36.64			29.90	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 19:35	20	SEC		36.60			29.90	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 19:40	20	SEC		38.81			29.90	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 19:45	20	SEC		40.75			29.90	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 19:50	20	SEC		49.61			29.90	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 19:55	20	SEC		46.08			29.90	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 20:00	20	SEC		54.92			29.90	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 20:05	21	SEC		53.80			45.40	2.47		32,000.0000	6,245.0000
10/11/22	10/11/2022 20:10	21	SEC		50.10			45.40	2.47		31,999.9998	6,245.0000
10/11/22	10/11/2022 20:15	21	SEC		54.19			45.40	2.47		32,000.0002	6,245.0000
10/11/22	10/11/2022 20:20	21	SEC		65.94			45.40	2.59		32,000.0003	6,245.0000

DATE : 10/11/2022
INTERVAL : 1840H
UNIT : Limay 6
SO DISPATCHER : Balmores
INSTRUCTION TIME (START) : 1836H
FROM (MW) : 58.9MW
TO (MW) : 30MW
REMARKS : Thermal limit of transmission line (SECURITY LIMIT LOWER)

DATE : 10/11/2022
INTERVAL : 2020H
UNIT : Limay 6
SO DISPATCHER : Balmores
INSTRUCTION TIME (START) : 2016H
FROM (MW) : 15MW
TO (MW) : 55.9MW
REMARKS : follow RTD (end of SECURITY LIMIT LOWER)

• Summary of Limay Units that was hard flagged by SO for Security Lower due to Line Limitation

DATE	DATE TIME	INT	MPR	LIMAY 6								
				AS	RTD	RD	RU	ALD	D-MQ	F-MQ	LMP	LMP - DIPC
10/11/2022	10/11/2022 23:05	24	SEC	-	13.55	-	-	14.50	0.44	-	33,113.7644	6,245.0000
10/11/2022	10/11/2022 23:10	24	SEC	-	27.05	-	-	14.50	1.56	-	33,079.8650	6,245.0000
10/11/2022	10/11/2022 23:15	24	SEC	-	39.05	-	-	14.50	2.71	-	32,003.9869	6,245.0000
10/11/2022	10/11/2022 23:20	24	SEC	-	45.65	-	-	14.50	3.61	-	32,000.0001	6,245.0000
10/11/2022	10/11/2022 23:25	24	SEC	-	47.82	-	-	14.50	3.91	-	32,000.0000	6,245.0000
10/11/2022	10/11/2022 23:30	24	SEC	-	46.14	-	-	14.50	3.83	-	31,999.9999	6,245.0000
10/11/2022	10/11/2022 23:35	24	SEC	-	49.46	-	-	14.50	4.03	-	32,000.0000	6,245.0000
10/11/2022	10/11/2022 23:40	24	SEC	-	35.96	-	-	14.50	3.53	-	31,992.3608	6,245.0000
10/11/2022	10/11/2022 23:45	24	SEC	-	41.98	-	-	14.50	3.33	-	32,000.0000	6,245.0000
10/11/2022	10/11/2022 23:50	24	SEC	-	35.09	-	-	14.50	3.03	-	32,000.0000	6,245.0000
10/11/2022	10/11/2022 23:55	24	SEC	-	27.70	-	-	14.50	2.46	-	32,000.0000	6,245.0000
10/11/2022	10/12/2022 0:00	24	SEC	-	14.20	-	-	14.50	1.76	-	31,996.5418	6,245.0000

DATE : 10/11/2022
INTERVAL : 2400H
UNIT : Limay 6
SO DISPATCHER : Balmores
INSTRUCTION TIME (START) : 2356H
FROM (MW) : 15MW
TO (MW) : 14.2MW
REMARKS : follow RTD (end of SECURITY LIMIT LOWER)

MEETING MINUTES

Annex F Presentation of MEI/PEI
Page 124 of 124

- Summary of Limay Units that was tagged as MOT Lower due to Line Limitation by SO

LIMAY 7

DATE	DATE TIME	UNIT	AS	RD	RD	RU	ALB	D-MQ	F-MQ	LMP	LMP-DIFC
10/14/2022	10:00	11 SEC	42.40	-	-	-	42.40	3.40	-	32,400.0000	6,245.0000
10/14/2022	10:05	11 SEC	35.91	-	-	-	35.91	3.11	-	32,400.0000	6,245.0000
10/14/2022	10:10	11 SEC	37.71	-	-	-	37.71	3.30	-	32,400.0000	6,245.0000
10/14/2022	10:15	11 SEC	35.16	-	-	-	35.16	2.74	-	32,400.0000	6,245.0000
10/14/2022	10:20	11 SEC	40.39	-	-	-	40.39	2.46	-	32,400.0000	6,245.0000
10/14/2022	10:25	11 SEC	45.64	-	-	-	45.64	2.46	-	32,400.0000	6,245.0000
10/14/2022	10:30	11 SEC	41.00	-	-	-	41.00	2.46	-	32,400.0000	6,245.0000
10/14/2022	10:35	11 SEC	37.59	-	-	-	37.59	2.46	-	32,400.0000	6,245.0000
10/14/2022	10:40	11 SEC	35.59	-	-	-	35.59	2.46	-	32,400.0000	6,245.0000
10/14/2022	10:45	11 SEC	33.11	-	-	-	33.11	2.46	-	32,400.0000	6,245.0000
10/14/2022	10:50	11 SEC	34.97	-	-	-	34.97	2.46	-	32,400.0000	6,245.0000
10/14/2022	10:55	11 SEC	37.86	-	-	-	37.86	2.46	-	32,400.0000	6,245.0000
10/14/2022	11:00	11 SEC	37.59	-	-	-	37.59	2.46	-	32,400.0000	6,245.0000
10/14/2022	11:05	20 SEC	35.64	-	-	-	35.64	2.49	-	32,400.0000	6,245.0000
10/14/2022	11:10	20 SEC	24.60	-	-	-	24.60	1.92	-	32,400.0000	6,245.0000
10/14/2022	11:15	20 SEC	33.44	-	-	-	33.44	1.64	-	32,400.0000	6,245.0000
10/14/2022	11:20	20 SEC	33.02	-	-	-	33.02	1.64	-	32,400.0000	6,245.0000
10/14/2022	11:25	20 SEC	32.11	-	-	-	32.11	1.64	-	32,400.0000	6,245.0000
10/14/2022	11:30	20 SEC	30.57	-	-	-	30.57	1.64	-	32,400.0000	6,245.0000
10/14/2022	11:35	20 SEC	32.61	-	-	-	32.61	1.64	-	32,400.0000	6,245.0000
10/14/2022	11:40	20 SEC	32.44	-	-	-	32.44	1.64	-	32,400.0000	6,245.0000
10/14/2022	11:45	20 SEC	30.53	-	-	-	30.53	1.64	-	32,400.0000	6,245.0000
10/14/2022	11:50	20 SEC	31.07	-	-	-	31.07	1.64	-	32,400.0000	6,245.0000
10/14/2022	11:55	20 SEC	32.73	-	-	-	32.73	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:00	20 SEC	31.06	-	-	-	31.06	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:05	21 SEC	26.41	-	-	-	26.41	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:10	21 SEC	32.96	-	-	-	32.96	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:15	21 SEC	31.84	-	-	-	31.84	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:20	21 SEC	31.59	-	-	-	31.59	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:25	21 SEC	31.33	-	-	-	31.33	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:30	21 SEC	31.31	-	-	-	31.31	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:35	21 SEC	31.20	-	-	-	31.20	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:40	21 SEC	29.04	-	-	-	29.04	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:45	21 SEC	31.20	-	-	-	31.20	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:50	21 SEC	28.60	-	-	-	28.60	1.64	-	32,400.0000	6,245.0000
10/14/2022	12:55	21 SEC	29.87	-	-	-	29.87	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:00	21 SEC	29.18	-	-	-	29.18	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:05	21 SEC	29.65	-	-	-	29.65	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:10	22 SEC	35.93	-	-	-	35.93	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:15	22 SEC	32.43	-	-	-	32.43	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:20	22 SEC	35.93	-	-	-	35.93	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:25	22 SEC	49.41	-	-	-	49.41	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:30	22 SEC	56.29	-	-	-	56.29	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:35	22 SEC	55.44	-	-	-	55.44	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:40	22 SEC	55.23	-	-	-	55.23	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:45	22 SEC	41.73	-	-	-	41.73	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:50	22 SEC	55.63	-	-	-	55.63	1.64	-	32,400.0000	6,245.0000
10/14/2022	13:55	22 SEC	52.44	-	-	-	52.44	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:00	22 SEC	41.99	-	-	-	41.99	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:05	22 SEC	32.40	-	-	-	32.40	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:10	22 SEC	41.40	-	-	-	41.40	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:15	22 SEC	28.20	-	-	-	28.20	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:20	22 SEC	14.73	-	-	-	14.73	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:25	22 SEC	28.20	-	-	-	28.20	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:30	22 SEC	41.73	-	-	-	41.73	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:35	22 SEC	33.24	-	-	-	33.24	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:40	22 SEC	35.02	-	-	-	35.02	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:45	22 SEC	33.21	-	-	-	33.21	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:50	22 SEC	32.22	-	-	-	32.22	1.64	-	32,400.0000	6,245.0000
10/14/2022	14:55	22 SEC	35.02	-	-	-	35.02	1.64	-	32,400.0000	6,245.0000
10/14/2022	15:00	22 SEC	35.02	-	-	-	35.02	1.64	-	32,400.0000	6,245.0000
10/14/2022	15:05	24 SEC	32.22	-	-	-	32.22	1.64	-	32,400.0000	6,245.0000
10/14/2022	15:10	24 SEC	35.02	-	-	-	35.02	1.64	-	32,400.0000	6,245.0000
10/14/2022	15:15	24 SEC	49.32	-	-	-	49.32	1.64	-	32,400.0000	6,245.0000
10/14/2022	15:20	24 SEC	24.31	-	-	-	24.31	1.64	-	32,400.0000	6,245.0000
10/14/2022	15:25	24 SEC	42.46	-	-	-	42.46	1.64	-	32,400.0000	6,245.0000
10/14/2022	15:30	24 SEC	35.31	-	-	-	35.31	1.64	-	32,400.0000	6,245.0000
10/14/2022	15:35	24 SEC	24.62	-	-	-	24.62	1.63	-	32,400.0000	6,245.0000
10/14/2022	15:40	24 SEC	17.24	-	-	-	17.24	1.63	-	32,400.0000	6,245.0000
10/14/2022	15:45	24 SEC	7.34	-	-	-	7.34	1.63	-	32,400.0000	6,245.0000
10/14/2022	15:50	24 SEC	20.49	-	-	-	20.49	1.63	-	32,400.0000	6,245.0000
10/14/2022	15:55	24 SEC	24.30	-	-	-	24.30	1.64	-	32,400.0000	6,245.0000
10/14/2022	16:00	24 SEC	18.80	-	-	-	18.80	1.63	-	32,400.0000	6,245.0000
10/14/2022	16:05	24 SEC	24.30	-	-	-	24.30	1.63	-	32,400.0000	6,245.0000

DATE : 10/14/2022
INTERVAL : 1805H
UNIT : Limay 7
SO DISPATCHER : Orenica
INSTRUCTION TIME (START) : 1802H
FROM (MW) : 56MW
TO (MW) : 35MW
REMARKS : MOT lower due to line limitation

DATE : 10/14/2022
INTERVAL : 1815H
UNIT : Limay 7
SO DISPATCHER : Orenica
INSTRUCTION TIME (START) : 1811H
FROM (MW) : 55.15MW
TO (MW) : 30MW
REMARKS : MOT lower due to line limitation

DATE : 10/14/2022
INTERVAL : 1900H
UNIT : Limay 7
SO DISPATCHER : Orenica
INSTRUCTION TIME (START) : 1858H
FROM (MW) : 37.25MW
TO (MW) : 25MW
REMARKS : MOT lower due to line limitation

DATE : 10/14/2022
INTERVAL : 1915H
UNIT : Limay 7
SO DISPATCHER : Orenica
INSTRUCTION TIME (START) : 1906H
FROM (MW) : 33.44MW
TO (MW) : 20MW
REMARKS : MOT lower due to line limitation

DATE : 10/14/2022
INTERVAL : 2335H
UNIT : Limay 7
SO DISPATCHER : Orenica
INSTRUCTION TIME (START) : 2333H
FROM (MW) : 25MW
TO (MW) : 26.2MW
REMARKS : MOT Lifted, follow RTD

End of Presentation
Thank you