



Study on the Inclusion of Biomass Plants as Must-Dispatch under DOE DC No. 2022-10-0031



MAY 2023

This Report is prepared by the
Wholesale Electricity Spot Market –
Technical Committee (WESM – TC)

EXECUTIVE SUMMARY

The promulgation of the Department Circular (DC) No. 2022-10-0031 entitled *Declaring all Renewable Energy Resources as Preferential Dispatch Generating Units in the Wholesale Electricity Spot Market Amending for this Purpose Department Circular No. DC 2015-03-001* expanded the applicability of “Preferential Dispatch” to all types of RE resources to include dispatchable (i.e., not intermittent) such as impounding hydro, geothermal, and biomass power plants.

In relation to this amendment, the Office of the Chief Governance Officer (CGO) requested the TC to conduct a study whether the biomass plants should be facilitated as a “must dispatch” as prescribed in the subject DC. Based on the TC’s understanding, the study being requested is only a part of a blanket policy by the DOE. This is the reason the TC opted to offer their analysis and understanding of the shift in policy of DOE and how it can be addressed in WESM governance and operations.

The general observation of the TC is that both 2015 and 2022 circulars are inconsistent with the RE Act in the application of the phrases “must dispatch” and “dispatch priority”. The DOE circular DC2015-03-0001 differentiated “Must Dispatch” and “Dispatch Priority” with an interpretation of Sections 20 and 7 of the RE Act. On the other hand, DC-2022-10-0031 used the term “Preferential Dispatch” to expand the applicability to all types of RE resources including those using emerging technologies. As of the submission of this report, the TC has no knowledge of any amendments that may have been made to the RE Act to accommodate the two policies mentioned.

The TC believes that it would be more productive to support DOE in their mandate through the following suggestions and recommendations that will help WESM and the power industry in general to prepare for the high level of penetration of RE resources in the WESM:

1. Clarify concepts of dispatchability and variability.
2. Specify Dispatch Priority in the WESM.
3. Take advantage of the 5-minute dispatch interval in the WESM.
4. Study alternative methods to determine short-term reserve requirements.
5. Take advantage of ESS technologies to improve RE dispatchability.
6. Measure and monitor long-term generation reliability.

Furthermore, the TC understands the policy of the State to support the Climate Change Agenda and to insulate the country against any disruption in the global energy supply chain. The TC believes that the best way forward is to prepare for the increased penetration of RE resources should the DOE succeed in their policy objectives.

Contents

1.0	INTRODUCTION.....	3
2.0	FINDINGS AND OBSERVATIONS.....	4
3.0	SUGGESTIONS AND RECOMMENDATIONS.....	5
4.0	CONCLUSION	8
5.0	REFERENCES.....	8
6.0	APPENDIX 1.....	10

1.0 INTRODUCTION

This report is in response to a letter from the Chief Governance Officer (CGO) requesting the TC to conduct a study whether the biomass plants should be facilitated as a “must dispatch” as prescribed in the subject department circular dated 05 October 2022, and signed by the Department of Energy (DOE) Secretary.

Subsequently, a request for Market Rules and Manuals amendments (ORCP-WR-WM-22-13) was initiated by IEMOP on 23 December 2022, in compliance to this department circular. Later, a Resolution (No. 2023-01) was issued by the PEM Board on 09 January 2023 which certified the proposed amendment as urgent. Recently, the Rules Change Committee (RCC) is inviting discussion papers and comments on the proposed amendment setting the deadline for submission on 15 March 2023.

The TC did not provide any comments on the proposed amendments for two reasons: (1) the justifications used by IEMOP was mainly on compliance to the DOE circular, and (2) the PEMB have already certified the amendment as urgent.

The view of the TC is that it would be more productive to provide an analysis in the policy shift of DOE and recommend how such changes can be managed from a WESM governance and operations point of view.

Renewable Energy Law (RA 9513)

In 2008, Republic Act 9513 – “An Act Promoting the Development, Utilization, and Commercialization of Renewable Energy Resources and for Other Purposes” became a law which is known today as the RE Act.

Prior to the RE Act, the renewable energy generation mix was already at the national level stands at 33.92% primarily due to existing hydro (16.18%) and geothermal (17.63%) resources. Smaller RE resources (i.e., wind, solar biomass) shared (less) than 0.10% of the total generation. By 2021, the total RE energy share decreased to 22.4% but the contribution of wind, solar, and biomass combined increased to 3.68%. The national targets set by DOE for RE energy share are 35% by 2030 and 50% by 2040.

In addition to the establishment of the Renewable Energy Market (Section 8) and the Green Energy Option (Section 9) by PEMC, the RE Act required WESM to grant priority dispatch to intermittent RE generating plants. Section 20 of the RE Act defined intermittent RE resources as those using wind, solar, run-of-river hydro, or ocean energy. This is the main thrust of the 2015 and 2022 DOE circulars as presented in the following section.

DOE Policy Directions

The changes in policy direction of DOE regarding RE dispatch can be shown by comparing the department circulars DC2022-10-0031 to DC2015-03-0001 as shown in Appendix 1. The latter which was issued seven years earlier was deemed amended by the 2022 circular if there are inconsistencies.

The Preamble of the 2022 circular, although written in a different style, remains supportive of the RE Act. The Russian-Ukraine War which affected global supply chain and prices of fossil fuels was cited as a consideration to reduce dependence on imported energy.

The shift in the DOE policy as identified in the General Provisions can be summarized as follows:

- All RE resources shall enjoy “Preferential Dispatch” in the WESM regardless of the type of RE technology.
- Must Dispatch in the WESM is granted to intermittent energy or VRE resources which includes wind, solar, run-of-river hydro, and ocean energy power plants.
- Dispatch Priority in the WESM is granted to biomass, geothermal, and impounding hydro plants which are dispatchable generating units that are not “Must Dispatch”.
- Other emerging RE Technologies may also be considered for “Preferential Dispatch” subject to NREB recommendation and DOE approval.

The DC2022-10-0031 expanded the applicability of “Preferential Dispatch” to all types of RE resources to include dispatchable (i.e., not intermittent) such as impounding hydro, geothermal, and biomass power plants. The applicability may also extend to emerging RE resources.

In this respect, the TC would like to point out that the study being requested is only a part of a blanket policy by the DOE. This is the reason TC opted to offer their analysis and understanding of the shift in policy of DOE and how it can be addressed in WESM governance and operations.

2.0 FINDINGS AND OBSERVATIONS

Three documents relating to “must dispatch” and “dispatch priority” for RE resources were analysed by the TC which led to the following findings and observations:

1. Section 20 of the RE Act (of 2008) used the phrase “must dispatch” for intermittent RE resources which shall be given dispatch priority. Based on TC interpretation, it seems that this section is attempting to define “Must Dispatch” as registered intermittent RE resources given the benefit of priority dispatch based on available resource energy.

The section continues with the succeeding paragraph describing “Intermittent RE Resource” as location-specific and naturally difficult to precisely predict the availability of resource energy thereby making the generated output variable, unpredictable, irregular, and inherently uncontrollable. The paragraph further stated inclusion of plants utilizing wind, solar, run-of-river hydro, or ocean energy.

2. DC2015-03-0001 defined “Must Dispatch” as facilitated in the WESM by qualified and registered intermittent RE-based plants, whether under Feed-In Tariff (FIT) system or not, such as wind, run-of-river hydro, or ocean energy, according to the preference in the dispatch schedule whenever generation is available. The enjoyment of Must Dispatch by intermittent RE-based plants is based on the difficulty to precisely predict the availability of RE resource thereby making the energy generated variable and irregular and the availability of resource inherently uncontrollable pursuant to Section 20 of the RE Act. Based on TC understanding, term is still consistent with the RE Act even with the extraneous insertion of the FIT application.

The definition “Priority Dispatch” as giving preference to biomass plants under the FIT system, in the dispatch schedule pursuant to Section 7 of the RE Act. It is the opinion of TC that this definition is not consistent with the RE Act for two reasons: (a) dispatch priority is granted to intermittent RE resources which does not include biomass power plants, and (b) Section 7 of the RE Act refers to FIT applications (although it includes biomass) not to priority dispatch.

The term “Preferential Dispatch” was introduced in the 2015 circular (see Section 2[a]) when referring to “Must Dispatch” and “Dispatch Priority”, collectively.

3. DC2022-10-0031 provided a more concise definition of “Must Dispatch” (no FIT application mentioned) but it remains consistent with the Section 20 of the RE Act. “Priority Dispatch” was defined as giving the option or preference to all qualified and registered RE plants that are not Must Dispatch such as biomass, geothermal, and impounding hydro plant to enjoy preferential dispatch in the WESM, taking into consideration their contractual obligations with their respective customers.

The 2022 circular provide a blanket policy to grant dispatch priority to all types of RE resources including biomass, geothermal, and impounding hydro. Emerging RE technologies are also given the same considerations. TC believes that this deviates from the provisions of the RE Act.

The general observation of the TC is that both 2015 and 2022 circulars are inconsistent with the RE Act in the application of the phrases “must dispatch” and “dispatch priority”. The DOE circular DC2015-03-0001 differentiated “Must Dispatch” and “Dispatch Priority” with an interpretation of Sections 20 and 7 of the RE Act. On the other hand, DC-2022-10-0031 used the term “Preferential Dispatch” to expand the applicability to all type of RE resources including those using emerging technologies. As of the submission of this report, the TC has no knowledge of any amendments that may have been made to the RE Act to accommodate the two policies mentioned.

Notwithstanding, (the policy directions given by DOE to the WESM), the TC understands the necessity to adapt to local and global developments in the energy sector (e.g., Russia-Ukraine War) as a policy of the State for supply security and self-sufficiency.

Although the WESM objectives are clearly defined in the market rules (Section 1.2.5), it does not fully cover the policy of the State of ensuring the security of supply of electric power by promoting indigenous and renewable energy resources. In addition, Climate Change Agenda of reducing harmful emissions by increasing RE generation mix is also an international commitment of the State. The TC believes this is the mandate being exercised by DOE in the policies of the said circulars.

3.0 SUGGESTIONS AND RECOMMENDATIONS

The TC believes that it would be more productive to support DOE in their mandate through the following suggestions and recommendations that will help WESM and the power industry in general to prepare for the high level of penetration of RE resources in the WESM:

1. Clarify concepts of dispatchability and variability.

A market resource (generator, load, or energy storage system) should be considered as “dispatchable” if they can follow dispatch schedules and instructions. Variability, on the other hand, refers to the unpredictable, irregular, and inherently uncontrollable output of the resource which makes it intermittent.

If intermittent RE resource outputs are variable (i.e., VRE), they would be difficult (if not impossible) to dispatch making them “non-dispatchable”. It would even be more difficult if such resources are granted priority dispatch and if they have a significant share in the generation mix (e.g., 35% by 2030, and 50% by 2040).

From the point of view of dispatch and scheduling, the TC believes that intermittent RE resources which are prioritized based on their availability should be considered as “non-scheduled resources”. Only RE resources that are not intermittent (i.e., biomass, hydro and geothermal) should be classified for priority dispatch.

To explain further, the concept of resource-based and scheduling in the WESM as illustrated in Table 1. This concept is being introduced by the TC in their MNM and DAM/DABS studies which may require more detailed explanations. Suffice to say that fundamental concepts applied by MO and SO have to be considered in policy and rulemaking.

Table 1. Category of market resources in the WESM.

Market Resources	Dispatchable		Non-Dispatchable	
	Priority	Scheduled	Non-scheduled	Embedded
Generator	Projected Output	Offer	Nominated Output	DU Control
Load	Contracted A/S	Bid	Forecasted Demand	DU Control
Energy Storage	Contracted A/S	Offer/Bid	Price Triggered	DU Control

2. Specify Dispatch Priority in the WESM.

Given the concept of resource-based dispatch and scheduling in the WESM, the next logical step is to specify the order of priority (which is not necessarily economic merit order). In the opinion of the TC, the following order of priority of resource dispatch should be considered:

- First priority: Bilateral supply contracts,
- Second priority: RE and other resources based on DOE policies,
- Third priority: Bids and offers of resources.

Resources with bilateral supply contracts whether they are conventional or RE resources should be given highest priority since they are legally binding agreements and they provide more certainty to investors and stable supplies.

In a recent study by TC, it was proposed that day-head bilateral schedule be introduced in the WESM to improve accountability and transparency in bilateral contract management. The effect of this the WESM real-time market (RTD) shall be net of BCQ.

It is a given that DOE policies will evolve over time depending on global and local developments. For this reason, the mandate of DOE should be recognized when it comes to prioritizing the utilization of different energy resources which recently is being applied to RE. (In a recent PGC/PDC amendment consultative forum it was even mentioned by DOE representatives that the nuclear option is being considered in the future generation mix). However, the TC believes this should take second priority. Competitive market-based resources are the last in the order of priority for dispatch and scheduling in the WESM.

The TC believes that such order of priority in dispatch and scheduling will avoid the need to put details of laws and policies in the WESM rule and procedures which could complicate operation and governance.

It is also important to be able to objectively assess, identify, and manage the risks of demand-supply uncertainties not only with RE resources but even for conventional resources and other emerging technologies that comes with new DOE policies.

Lastly, note that the dispatch priority specified above should apply only under normal grid conditions and should give way to market intervention by SO during emergency and alert situations.

3. Take advantage of the 5-minute dispatch interval in the WESM.

The TC believes that the 5-minute dispatch interval introduced by the Enhanced WESM Design and Operations (EWDO) should have a significant role in defining dispatchability and variability of market resources.

If dispatchability is defined as the ability of a market resource to follow dispatch schedules and instructions, it has to be based on (a) dispatch tolerance and (b) sustained output over a given time interval.

Dispatch tolerance is the allowed deviation of the market resource output from the scheduled dispatch or dispatch instruction. Sustained output can be a linear ramping or constant output over specified time interval. The time interval can be the dispatch interval or any multiple of this interval.

In a similar logic, variability can be defined as the maximum time interval beyond which the resource is not able to sustain its output (whether linear ramping or constant output). In the preceding definitions, it can be inferred that a shorter dispatch interval will reduce the variability of a resource and make them more dispatchable. The 5-minute trading interval provides such benefit if applied properly.

4. Study alternative methods to determine short-term reserve requirements.

In a study made by TC on the penetration of VRE and the reserve market it was recommended that further studies on the methods of determination of reserve requirements given the high level of VRE in the generation mix and their dispatch priority. It is expected that such developments will lead to greater reserve requirements although there are very little empirical data to support further. A study by the National Renewable Energy Laboratory (NREL) on Operating Reserves and Variable Generation can be a good starting point for this endeavour.

5. Take advantage of ESS technologies to improve RE dispatchability.

In a study made by the TC on ESS participation in the WESM, it was proposed that only hybrid ESS (i.e., those integrated with generators should be classified as generator trading participant. It was further proposed that stand-alone ESS be allowed to trade in the WESM by demand bid and generation offers. This will support the RE development two-folds: (i) VRE with integrated BESS can become dispatchable and (ii) stand-alone BESS supplements system reserve and dispatchable loads to address variability of RE resources.

6. Measure and monitor long-term generation reliability.

The TC believes that security of supply in the market starts with the long-term reliability of the generation sector. This is traditionally measured by Loss of Load Probability (LOLP) which is the percentage of time

over a specified period when the available generation capacity cannot meet the demand in the grid. Similarly, Loss of Load Expectation (LOLE) is the number of hours or days in a given period when available generation cannot meet the demand. Both factor in demand through a load duration curve (LDC) and the availability of generator capacity, derating, and output energy. The benchmark LOLE for grids in developing countries like the Philippines is 1 day/year. In more developed grids like North America and Europe it is 1 day every 10 years.

These generation reliability indices can be applied historically, estimate current performance, and evaluate expansion plans. LOLE can provide a long-term indication of the security of the grid particularly with the increasing penetration of VRE in the grid. This would be a helpful tool in policy making on VRE penetration and reserve requirements.

There are many available power system planning references applying these indices considering VRE penetration. As of the writing of this report, the TC is not aware of any agency that performs this type of generation reliability assessment.

The above suggestions and recommendations are based on what the TC believes as “good utility practice and sound engineering judgements” which could serve as guide to policy and rulemaking.

4.0 CONCLUSION

The inclusion of biomass power plants as “Must Dispatch” in the WESM is just a portion of a blanket policy of DOE to promote and encourage RE resources in the power industry. The TC used the term blanket policy because of the inclusion of non-intermittent RE resources for priority dispatch in the WESM.

The TC understands the policy of the State is to support the Climate Change Agenda and to insulate the country against any disruption in the global energy supply chain. The TC believes that the best way forward is to prepare for the increased penetration of RE resources should the DOE succeed in their policy objectives.

The TC is basing this observation from their understanding of the documents being reviewed and does not claim any authority or expertise in the legal interpretation of laws and government policies.

5.0 REFERENCES

- Renewable Energy Act (RA 9513)
- Philippine Grid Code
- WESM Market Rules
- WESM Dispatch Protocol Manual
- DOE Department Circulars
- PEMB Resolution
- IEMOP Request for Market Rules and Manuals Amendments
- Technical Committee Studies on VRE Penetration

SUBMITTED BY:

[signed]

MARIO R. PANGILINAN
Chairperson

[signed]

JAIME V. MENDOZA
Member

[signed]

ERMELINDO R. BUGAOISAN, JR.
Member

[signed]

EDWIN N. MOSA
Member

6.0 APPENDIX 1

Changes in the DOE Policy on RE Dispatch.

Relevant Details	DC2022-10-0031	DC2015-03-0001
Circular Titles	<u>Declaring All RE Resources as Preferential Dispatch Generating Units</u> in the WESM Amending for this Purpose DC2015-03-0001	Promulgating the Framework of the Implementation of Must Dispatch and Priority Dispatch of RE Resources in the WESM
Date Issued	October 5, 2022	March 20, 2015

Relevant Details	DC2022-10-0031	DC2015-03-0001
Preamble Changes	<p>WHEREAS, granting all units utilizing RE resources either Must Dispatch or Dispatch Priority Status (collectively referred to as “Preferential Dispatch status) will aid in accelerating the development and utilization of indigenous RE resources and reduce dependence on imported conventional energy resources thereby minimizing the country’s exposure to price fluctuations in the global markets, and making the supply and delivery of electric power more stable and secured from international incidents, such as the conflict between Russia and Ukraine, which caused delays and disruptions in global supply value chain and price increase in imported fuel</p> <p>WHEREAS, the development and full utilization of RE will support the country’s efforts to achieve it Nationally Determined Contribution Targets that are primarily based on RE policies and programs, among others;</p> <p>WHEREAS, the grant of Preferential Dispatch status in the WESM to all generating units utilizing RE resources will reduce market settlement prices, based on study conducted by the DOE, in partnership with the Clean, Affordable and Secure Energy for Southeast Asia (CASE) Project ...</p>	<p>WHEREAS Section 2 of Republic Act No. 9513 otherwise known as the Renewable Energy Act of 2008 (RE Act), declares as a policy of the State to:</p> <ul style="list-style-type: none"> (a) Accelerate the exploration and development of RE resources such as but not limited to, biomass, solar, hydro, geothermal and ocean energy resources, including hybrid systems, to achieve energy self-reliance, through the adoption of sustainable energy development strategies to reduce the country’s dependence on fossil fuels and thereby minimize the country’s exposure to price fluctuation in the international markets, the effect of which spiral down to almost all sectors of the economy; (b) Increase utilization of RE by institutionalizing the development of national and local capabilities in the use of RE systems, and promoting its efficient and cost-effective commercial operation application by providing fiscal and non-fiscal incentives; and, (c) Encourage the development and utilization of RE resources as tools to effectively prevent or reduce harmful emissions and thereby balance the goals of economic growth and development with the protection of health and the environment...

Relevant Details	DC2022-10-0031	DC2015-03-0001
General Provisions – Coverage	<p>Section 2. Coverage. The Amended Preferential Dispatch classifications, as defined in Section 3 hereof, shall cover all existing and new RE generating plant.</p>	<p>Section 1. Scope and Application. This Circular shall apply to all agencies and entities named herein and all electric power industry participants in the country.</p> <p>Section 2. Purposes. This Circular is being issued to: (a) Define Must Dispatch pursuant to the RE Act including the high level process for qualification, certification, and registration of generating unit designated as must dispatch and priority dispatch (collectively referred to as Preferential Dispatch Units), and (b) Provide framework for integration in the WESM of Preferential Dispatch Generating Units consistent with the goals of EPIRA and the RE Act.</p>

Relevant Details	DC2022-10-0031	DC2015-03-0001
General Provisions – Must Dispatch Definition	Section 3. (a) “Must Dispatch” is facilitated in the WESM for qualified and registered intermittent and variable RE-based plants, which include wind, solar, run-of-river, hydro, and ocean energy plants according to the preference in the dispatch schedule whenever generation is available, pursuant to Section 20 of the RE Act	Section 4 (a). “Must Dispatch” Is facilitated in the WESM by qualified and registered intermittent RE-based plants, whether or not under FIT system, such as wind, run-of-river hydro, or ocean energy, according to the preference in the dispatch schedule whenever generation is available. The enjoyment of Must Dispatch by intermittent RE-based plants is based on the difficulty to precisely predict the availability of RE resource thereby making the energy generated variable and irregular and the availability of resource inherently uncontrollable pursuant to Section 20 ¹ of the RE Act.
General Provisions - Priority Dispatch Definition	Section 3 (b). “Priority Dispatch” means giving the option or preference to all qualified and registered RE plants that are not Must Dispatch such as biomass, geothermal and impounding hydro	Section 4 (b). “Priority Dispatch” means giving preference to biomass plants under the FIT system, in the dispatch schedule pursuant to Section 7 of the RE Act ² .

¹ **RE Act Section 20. Intermittent RE Resources.** – TRANSCO or its successors-in-interest, in consultation with stakeholders, shall determine the maximum penetration limit of the Intermittent RE-based power plants to the Grid, through technical and economic analysis. Qualified and registered RE generating units with intermittent RE resources shall be considered “must dispatch” based on available energy and shall enjoy the benefit of priority dispatch. All provisions under the WESM Rules, Distribution and Grid Codes which do not allow “must dispatch” status for intermittent RE resources shall be deemed amended or modified. The PEMC and TRANSCO or its successors-in-interest shall implement technical mitigation and improvements in the system in order to ensure safety and reliability of electricity transmission.

As used in this Act, RE generating unit with intermittent RE resources refers to a RE generating unit or group of units connected to a common connection point whose RE energy resource is location-specific naturally difficult to precisely predict the availability of RE energy resource thereby making the energy generated variable, unpredictable and irregular and the availability of the resource inherently uncontrollable, which include plants utilizing wind, solar, run-of-river hydro or ocean energy.

² **RE Act Section 7. Feed-In Tariff System.** – To accelerate the development of emerging renewable energy resources, a feed-in tariff system for electricity produced from wind, solar, ocean, run-of-river hydropower and biomass is hereby mandated. Towards this end, the ERC in consultation with the National Renewable Energy Board (NREB) created under Section 27 of this Act shall formulate and promulgate feed-in tariff system rules within one (1) year upon the effectivity of this Act which shall include, but not limited to the following:

- (a) Priority connections to the grid for electricity generated from emerging renewable energy resources such as wind, solar, ocean, run-of-river hydropower and biomass power plants within the territory of the Philippines;
- (b) The priority purchase and transmission of, and payment for, such electricity by the grid system operators;
- (c) Determine the fixed tariff to be paid to electricity produced from each type of emerging renewable energy and the mandated number of years for the application of these rates, which shall not be less than twelve (12) years;
- (d) The feed-in tariff to be set shall be applied to the emerging renewable energy to be used in compliance with the renewable portfolio standard as provided for in this Act and in accordance with the RPS rules that will be established by the DOE.

Relevant Details	DC2022-10-0031	DC2015-03-0001
	<p>plant to enjoy preferential dispatch in the WESM, taking into consideration their contractual obligations with their respective customers.</p>	
General Provisions – Policy Statement	<p>None</p>	<p>Section 3. Statement of Policy. Pursuant to the RE Act, intermittent RE resources including FIT-eligible generation shall be allowed to maximize injection to the grid while: (a) Maintaining system security at all times; (b) Maintaining economically efficient short-run dispatch of energy and ancillary services; and (c) Holding WESM participants to account for what they are able to control.</p>
General Provisions – Impounding Hydro Plants	<p>Section 4. Dispatch Priority of Impounding Hydro Plants. The grant of Priority Dispatch status to impounding hydro plant, currently categorized as scheduled plants in the WESM, shall be at the option of the RE developer with due consideration to grid security and reliability, and its contractual obligation.</p>	<p>None</p>
General Provisions – New RE Technologies	<p>Section 5. Emerging RE Technologies. The DOE may grant Preferential Dispatch status to any future emerging RE technologies that may be approved by the DOE upon recommendation of the NREB, which forms part of promoting energy transition towards energy security, energy self-sufficiency and sustainability for the country. In such case, the provisions laid down in this Circular and the WESM Rules and Manuals, as updated pursuant hereto, shall be followed.</p>	<p>None</p>