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**REQUEST FOR MARKET RULES AND MANUALS AMENDMENTS**

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Proposals made only under this prescribed form shall be accepted and considered as submitted.

This request for amendments are be submitted to:

**Rules Change Committee**

Attention: WESM Governance Committee Secretariat  
Philippine Electricity Market Corporation  
18/F Robinsons Equitable Tower  
ADB Avenue, Ortigas Center  
Pasig City, 1605 Philippines  
Email addresses: [rcc@wesm.ph](mailto:rcc@wesm.ph) / [mag\\_rrd@wesm.ph](mailto:mag_rrd@wesm.ph)  
Contact No: (+632) 8631-8734

**I. Proponent's Information**

Name	<b>Atty. Doroteo B. Aguila / Dr. Peter Lee U</b>
Designation	Market Surveillance Committee (MSC) Chairman / Compliance Committee (CC) Chairman
Company	Philippine Electricity Market Corporation (PEMC)
Company Address	18F Robinsons Equitable Tower
	Ortigas Center, Pasig City
Telephone No.	
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Email Address	<a href="mailto:dodiaguila@yahoo.com">dodiaguila@yahoo.com</a> / peter.u@uap.asia

## II. Amendment Information

<b>Proposed Amendments to the</b> (please tick the box):	
<input checked="" type="checkbox"/> WESM Rules	<input type="checkbox"/> Retail Rules
<input checked="" type="checkbox"/> Market Manual:	WESM Manual on Dispatch Protocol Issue 16.0
Topic:	Proposed Amendments to the WESM Rules and WESM Manual on Dispatch Protocol regarding Maximum Available Capacity
<b>Proposed Classification of Amendments</b> (please tick the box):	
<input checked="" type="checkbox"/> General	<input type="checkbox"/> Minor <input type="checkbox"/> Urgent
If Urgent, reason for urgency: _____	

## III. SUMMARY OF THE PROPOSED RULES CHANGE

The proposed amendments to the WESM Rules and WESM Manual on Dispatch Protocol will provide a clearer guidance and include other conditions (e.g., circuit breaker status, ramp rates) that shall be considered by the Trading Participants when offering/bidding or revising/updating offers in the market.

## IV. BACKGROUND

When a Trading Participant offers in the market, it includes (1) the quantity willing to be sold in the WESM, (2) the price at which the quantities are willing to be sold, and (3) the ramp rates that determine the capability of a plant to reach a target generation/schedule. These are some of the key inputs in determining prices and schedules in the market.

The Must-Offer Rule (MOR) prohibits generators in offering capacities below their registered capacity (Pmax) without a valid or justifiable cause. The act of offering in the market implies that they are willing and capable to run when dispatched at certain price levels.

However, there were instances when Trading Participants offer in the WESM without clear intention of generating energy for the grid. This is done by opening the breaker so that no schedule will be given, and offers/bids will not be considered in the optimization due to plant's disconnection from the grid. This act is a possible circumvention of the MOR and shows a disconnect between the intention to run by offering capacities, and the actual plan

of not running. In so doing, the Trading Participants are able to free themselves from the possible flagging of probable breach of the MOR.

Aside from the opening of the breaker, Trading Participants can also offer very low ramp rates as would render it impossible for the generating unit or plant to attain the offered capacity in the market. In this manner, they also impact the maximum available capacity that they can produce thereby defeating the purpose of the MOR. While this is currently allowed in the rules, the proponent believes that generators should be more aware of the impact or consequences of their actions vis-à-vis their obligations in the WESM.

## V. THE PROPOSED RULES CHANGE

The proposed amendments to the WESM Rules and WESM Manual on Dispatch Protocol aim to:

- have a clearer definition of maximum available capacity;
- provide guidance when offering/bidding or revising/updating of offers, which should be equal to the maximum available capacity;
- require Trading Participants to revise offers/bids if they do not reflect reasonable estimates of the unit's maximum available capacity; and
- include other conditions (e.g., circuit breaker status, ramp rates) in revising/updating offers.

By implementing the proposed rules changes, Trading Participants will reflect more accurately the maximum available capacity of the generating unit by considering other plant conditions in their market offers which achieves the objectives of the proposed amendments. These plant conditions will be part of the considerations of the Enforcement and Compliance Office (ECO) during the validation of the reasons or justifications provided.

In addition, the proposed amendments will encourage Trading Participants to be more responsible in accounting for permissible limitations in their offers and to recommend a more stringent process in monitoring the MOR following the proposed rules changes.

## VI. BACKGROUND AND DESCRIPTION OF THE PROPONENT

The proponent is the Market Surveillance Committee (MSC), alongside with the Compliance Committee (CC), as the co-proponent of the proposed amendments.

- a. **Market Surveillance Committee** – acts to monitor and report on activities in the spot market in accordance with the WESM Rules Clause 1.6

Chairman: Atty. Doroteo B. Agila  
Members: Engr. Arthur N. Escalante  
Engr. Christian M. Orias  
Engr. Ferdinand P. Villareal  
Engr. Peter L. Wallace

- b. **Compliance Committee** – acts to monitor compliance to and oversee the investigation of breach of the WESM Rules and Market Manuals by WESM Members, System Operator and the Market Operator, and to perform the functions set out in WESM Clause 1.8

Chairman: Dr. Peter Lee U  
Members: Engr. Primo M. Lim III  
Atty. Alejandro C. Dueñas II

## VII. CONCLUSIONS AND RECOMMENDATIONS

The proposed amendments are recommended to be adopted, as this will improve the compliance of the Trading Participants with the MOR by being more responsible in offering/bidding and revising/updating of offers.

## VIII. REFERENCES

- WESM Rules (as of May 06, 2022)
- WESM Manual on Dispatch Protocol Issue 16.0
- WESM Compliance Bulletin 11.0<sup>1</sup> – This issue of the WESM Compliance Bulletin provides for the updated Event Categories Guide for Generator-Trading Participants in Responding to Non-Compliance Notice/ Notice of Investigation

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<sup>1</sup> <https://www.wesm.ph/downloads/download/TWFya2V0IFJlcG9ydHM=/MTMwNw==>

**IX. Proposed Amendment to the WESM Rules and WESM Manual on Dispatch Protocol regarding Maximum Available Capacity**

**A. WESM Rules**

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
<p><i>Please write general comments here, if any.</i></p> <ol style="list-style-type: none"> <li>To avoid artificial supply, it must be ensured that the undischarged Reserve Schedule (contracted in the absence of the Reserve Market) is not used for the Genco's BCQ.</li> <li>A system for offer validation must be put in place to determine any significant deviation from historical or normal ramping rates. It may be a soft warning prompt which can enable the TP to include in its submission its explanation to such deviation.</li> <li>NGCP agrees with the amendment regarding the revision of Maximum Available Capacity prior to gate closure as long as the following should be observed: a) When the breaker is at OPENED position – it should be supported with valid reasons and not just to avoid possible breach of the MUST OFFER RULE. b) Also, same with the declaration of ramp rate – this should be based on the actual ramp rate and not artificial ramp rate, as what was being allowed by the rules. No need for TPs to offer with very low ramp rate since they are now allowed to submit revised capacity prior to gate closure subject for validation.</li> </ol>								
Generation Offers and Data	3.5.5.1	Each <i>Generation Company</i> including <i>Generation Companies</i> with <i>bilateral contracts</i> shall submit a standing <i>market offer</i> for each of its <i>scheduled generating units, battery energy storage systems and pumped-storage units</i>	Each <i>Generation Company</i> including <i>Generation Companies</i> with <i>bilateral contracts</i> shall submit a standing <i>market offer</i> <b><u>equivalent to the registered capacity or maximum available capacity</u></b> , for each of its <i>scheduled generating units, battery energy storage systems,</i>	<ul style="list-style-type: none"> <li>The Generation Companies shall consider the “possible constraints”, as defined in the maximum available capacity, in submitting a standing market offer.</li> </ul>	Agree. Proposing that the Generation Company shall be required to include in its standing and revised offers the reason in case wherein the Maximum Available Capacity is less	Each <i>Generation Company</i> including <i>Generation Companies</i> with <i>bilateral contracts</i> shall submit a standing <i>market offer</i> <b><u>equivalent to the registered capacity or maximum available capacity</u></b> , for each		

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		for each <i>dispatch interval</i> in each <i>trading day</i> of the week in accordance with the <i>timetable</i> . The standing <i>market offer</i> shall apply until revised or updated by the <i>Generation Company</i> .	and <i>pumped-storage units</i> for each <i>dispatch interval</i> in each <i>trading day</i> of the week in accordance with the <i>timetable</i> . The standing <i>market offer</i> shall apply until revised or updated by the <i>Generation Company</i> .	<ul style="list-style-type: none"> <li>To make sure that the offers in the market are readily available and TPs can provide.</li> </ul>	<p>than the Registered Capacity.</p> <p>For Clarification: Would a BESS and a pumped storage generator be required to offer its capacity while charging batteries or pumping energy for storage in upper reservoir? Are they allowed to offer negative quantities? How much negative quantities are they allowed to offer at the minimum? There ought to be rules for ancillary services vis-a-vis must offer rule as well.</p>	<p>of its <i>scheduled generating units, battery energy storage systems, and pumped-storage units</i> for each <i>dispatch interval</i> in each <i>trading day</i> of the week in accordance with the <i>timetable</i>. <b><u>If the submitted offer reflects a capacity that is less than the registered capacity, the Generation Company shall include the reason for such in its standing offer.</u></b> The standing <i>market offer</i> shall apply until revised or updated by the <i>Generation Company</i>.</p> <p><b>Appendix A1.1 Generation Offers</b></p> <p><b><u>(f) (new) Reasons or circumstances</u></b></p>		

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
						<u>whenever the submitted market bids or market offers are cancelled or are less than the registered capacity of its facility or generating unit.</u>		
Revision of Market Offers/Bids, Nomination of Loading Levels, and Projected Outputs	3.5.11.1	Each <i>Trading Participant</i> which has submitted standing <i>offers</i> or bids for each of its <i>scheduled generating unit, battery energy storage system and pumped-storage unit</i> may revise any of its <i>market offers</i> or <i>market bids</i> for any <i>dispatch interval</i> in any trading day of the current week-ahead <i>market horizon</i> in accordance with the <i>timetable</i> , and subject to Clause 3.5.11.4 and each revised <i>market offer</i> or <i>market bid</i> submitted shall provide the	Each <i>Trading Participant</i> which has submitted standing <i>offers</i> or bids for each of its <i>scheduled generating unit, battery energy storage system, and pumped-storage unit</i> may revise any of its <i>market offers</i> or <i>market bids</i> <b><u>equivalent to the maximum available capacity and shall take into account the conditions under Clause 3.5.11.5 and Clause 3.5.11.6,</u></b> for any <i>dispatch interval</i> in any trading day of the current week-ahead <i>market horizon</i> . <b><u>Each revised market offer or market bid shall be submitted</u></b> in accordance with the <i>timetable</i> , and subject to	<ul style="list-style-type: none"> <li>To ensure that the revised/updated market offer reflects the TP's readily available capacity.</li> <li>TPs to consider the conditions mentioned in 3.5.11.6 in revising/updating offers.</li> </ul>	Agree			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		information set out in Appendix A1.	Clause 3.5.11.4, and <del>each revised market offer or market bid</del> submitted shall provide the <u>contain</u> information set out in Appendix A1.					
Revision of Market Offers/Bids, Nomination of Loading Levels, and Projected Outputs	3.5.11.5	<i>Market bids or market offers for any dispatch interval may be revised by Trading Participants prior to gate closure if they no longer represent a reasonable estimate of:</i> (a) the expected availability of the relevant <i>generating unit</i> or <i>scheduled load</i> for that <i>dispatch interval</i> ; or (b) the <i>demand bids</i> or <i>offers</i> likely to apply for the real-time <i>dispatch</i> optimization of that <i>dispatch interval</i> .	<i>Market bids or market offers for any dispatch interval may shall be revised by Trading Participants prior to gate closure in accordance with the timetable</i> if they no longer represent a reasonable estimate of: (a) the expected <i>availability</i> of the relevant <i>generating unit</i> <u>(e.g., plant breaker status, outage)</u> or <i>scheduled load</i> for that <i>dispatch interval</i> <u>in relation to its status, such as but not limited to, plant breaker status or commitment state</u> ; or	<ul style="list-style-type: none"> <li>Requires TP to revise their offers if it does not represent a reasonable estimate its maximum available capacity</li> <li>Provided conditions to be taken in revising/updating offers</li> <li>Revising/updating market bids shall be within the WESM timetable (Reference of timetable: DPM Sec. 4)</li> <li>Insertion of "shall" to harmonize with DP 6.1.7 and</li> </ul>	<p>Proposing to include consideration for target startup and shutdown</p> <p>Also, NGCP agrees that there is a need to require the Trading Participants to revise/update their bids or offers if there are changes in the breaker status or the offer cannot be reached with the ramp rate limitations. However, we would like to suggest a further improvement of the process by:</p> <p>1. Prohibiting a Trading Participant</p>	<i>Market bids or market offers for any dispatch interval may shall be revised by Trading Participants prior to gate closure in accordance with the timetable</i> if they no longer represent a reasonable estimate of: (a) the expected <i>availability</i> of the relevant <i>generating unit</i> <u>considering technical constraints (e.g., plant breaker status, outage, startup and shutdown)</u>		

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p>(b) <b><u>the attainable capacity as may be affected by the ramp rate limitations encountered or likely to be encountered by the generating unit during the relevant dispatch interval; or</u></b></p> <p>(c) <i>the demand bids or offers likely to apply for the real-time dispatch optimization of that dispatch interval.</i></p>	require the TPs to revise the offers if it does not represent a reasonable estimate	<p>with open breaker status from submitting offers. 2. Requiring the ramp- rate submissions of Trading Participants to be consistent with their registered or certified ramp-rates.</p> <p>This would ensure that the Trading Participants with open breaker status will not be able to submit offers entirely, and that no schedules will be given for them. As for the ramp-rates, the submission of ramp-rates consistent with the certified or registered values will ensure that the maximum available capacity is attainable and will be meet by the Trading Participant</p>	<p><b><u>procedures</u></b> or <i>scheduled load</i> for that <i>dispatch interval</i> <b><u>in relation to its status, such as but not limited to, plant breaker status or commitment state;</u></b> or</p> <p>(b) <b><u>the attainable capacity as may be affected by the ramp rate limitations encountered or likely to be encountered by the generating unit during the relevant dispatch interval; or</u></b></p>		

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					should they be scheduled.	the <i>demand bids</i> or <i>offers</i> likely to apply for the real-time <i>dispatch optimization</i> of that <i>dispatch interval</i> .		
Glossary	(new)	(Definition from Dispatch Protocol Manual)  <b>Availability.</b> The duration of time over a specified period that a plant/unit is ready to be in service or operational.	<b><u>Availability. The duration of time over specified period that a plant is ready to be in service or operational state of readiness of a generating unit or facility for actual use, operation, or service for a particular time, period, or dispatch interval.</u></b>	<ul style="list-style-type: none"> <li>Added to provide clarity on the intent of availability mentioned in 3.5.11.5, that the plant is ready to provide service.</li> <li>Transferred the definition from Dispatch Protocol Manual since this was already introduced in the WESM Rules</li> </ul>	Note, however, that the PGC 2016 defines "Availability" as "The long-term average fraction of time that a Component or system is in service and satisfactorily performing its intended function. Also, the steady-state probability that a Component or system is in service." This definition refers not only to generating units but also to other grid components.	<b>Availability.</b> The duration of time over a specified period that a plant/ <b>generating</b> unit is ready to be in service or operational.		
Glossary	(new)	(Definition from Dispatch Protocol Manual)  <b>Maximum available capacity.</b> Equal to the	<b><u>Maximum available capacity. Equal to the registered maximum capacity (Pmax) of the (aggregate) unit less forced unit outages,</u></b>	<ul style="list-style-type: none"> <li>Transferred the definition from Dispatch Protocol Manual since this was already</li> </ul>	Agree			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		registered maximum capacity (Pmax) of the (aggregate) unit less forced unit <i>outages</i> , scheduled unit <i>outages</i> , de-rated capacity due to <i>technical constraints</i> and weather disturbance that cause damage to the unit or that would otherwise limit its ability to inject power to the <i>grid</i> . For co-generation systems, the <i>maximum available capacity</i> is further determined by taking into account the equivalent power of the thermal <i>energy</i> extraction by the <i>energy</i> host and <i>technical constraints</i> .	<b><u>scheduled unit outages, de-rated capacity technical constraints and weather disturbance that cause damage to the unit or that would otherwise limit its ability to inject power to the grid.</u></b> <del>For co-generation systems, the maximum available capacity is further determined by taking into account the equivalent power of the thermal energy extraction by the energy host and technical constraints.</del>	introduced in the WESM Rules <ul style="list-style-type: none"> <li>Previous definition includes the condition for co-generation systems. Proposed to delete since this condition is already specified in the definition of technical constraints including other conditions plant types.</li> </ul>				
Glossary	(new)	(Definition from Dispatch Protocol Manual)  <b>Technical Constraint.</b> Refers to plant equipment-related failure,	<b><u>Technical Constraint. Refers to plant equipment related failure/constraints, limitations encountered during start up/shutdown</u></b>	<ul style="list-style-type: none"> <li>Transferred the definition from Dispatch Protocol Manual since this was already introduced in the WESM Rules</li> </ul>	Agree.  Further, NGCP suggests to omit “constraints” since this is synonymous to “limitations”.	<b><u>Technical Constraint. Refers to plant equipment related failure/constraints, limitations encountered</u></b>		

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p>limitations encountered during <i>start-up/shutdown</i> procedure, effects of ambient temperature and resource-related <i>constraints</i> due to the following: (a) water elevation and diversion requirements for domestic or irrigation use for hydro plants; (b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants; (c) unavailability of fuel resources that are not within the control of the <i>Generation Company</i> for biomass power plants; and (d) steam flow limitations, station <i>load</i>, and electricity demand of its <i>energy</i> host, in the case of the co-generation systems.</p>	<p><b><u>procedure, effects of ambient temperature and resource-related constraints due to the following:</u></b></p> <p><b><u>(a) water elevation and diversion requirements for domestic or irrigation use for hydro plants;</u></b></p> <p><b><u>(b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants;</u></b></p> <p><b><u>(c) unavailability of fuel resources that are not within the control of the Generation Company for biomass power plants; and</u></b></p>			<p><b><u>during start up/shutdown procedure, effects of ambient temperature and resource-related constraints due to the following:</u></b></p>		

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<u>(d) steam flow limitations, station load, and electricity demand of its energy host, in the case of the co-generation systems.</u>					

B. WESM Manual on Dispatch Protocol Issue 16.0

WESM Manual on Dispatch Protocol Issue 16.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
<i>Please write general comments here, if any.</i>								
BIDS, OFFERS AND DATA SUBMISSION AND PROCESSING	Background	6.1.7 WESM Rules Clause 3.5.11.5 requires <i>Trading Participants</i> to revise their <i>bids</i> or <i>offers</i> if they no longer represent a reasonable estimate of either the expected <i>availability</i> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> or <i>scheduled load</i> or the <i>demand bids</i> or <i>offers</i> likely to apply in the <i>real-time dispatch</i> optimization for the <i>dispatch interval</i> .	6.1.7 WESM Rules Clause 3.5.11.5 requires <i>Trading Participants</i> to revise their <i>bids</i> or <i>offers</i> if they no longer represent a reasonable estimate of either the expected <b><u>status and availability (e.g., plant breaker status, outage)</u></b> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> , <b><u>ramp rate limitations from the plant statuses in attaining the market bids or market offers,</u></b> or <i>scheduled load</i> or the <i>demand bids</i> or <i>offers</i> likely to apply in the <i>real-time dispatch</i> optimization for the <i>dispatch interval</i> .	<ul style="list-style-type: none"> <li>To include other conditions in revising offers and cite samples</li> <li>To harmonize with the proposed amendment in WESM Rules Clause 3.5.11.5</li> </ul>	<p>For consistency with the aforementioned proposal</p> <p>NGCP also agrees that there is a need to require the <i>Trading Participants</i> to revise/update their offers, if there are changes in the breaker status or the offer cannot be reached with the ramp rate limitations. However, we would like to suggest a further improvement of the process by:</p> <p>1. Prohibiting a Trading</p>	6.1.7 WESM Rules Clause 3.5.11.5 requires <i>Trading Participants</i> to revise their <i>bids</i> or <i>offers</i> if they no longer represent a reasonable estimate of either the expected <b><u>status and availability considering technical constraints (e.g., plant breaker status, outage, startup and shutdown procedures)</u></b> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> , <b><u>ramp rate limitations from the plant statuses in attaining the market bids or market offers,</u></b> or <i>scheduled load</i> or the <i>demand bids</i> or <i>offers</i> likely to apply in the <i>real-time dispatch</i> optimization for the <i>dispatch interval</i> .		

**WESM Manual on Dispatch Protocol Issue 16.0**

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					<p>Participant with open breaker status from submitting offers.                      2. Requiring the ramp- rate submissions of Trading Participants to be consistent with their registered or certified ramp-rates.</p> <p>This would ensure that the Trading Participants with open breaker status will not be able to submit offers entirely, and that no schedules will be given for them. As for the ramp-rates, the submission of ramp-rates consistent with the certified or registered values will ensure that the maximum</p>			

**WESM Manual on Dispatch Protocol Issue 16.0**

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					available capacity is attainable and will be meet by the Trading Participant should they be scheduled.			
BIDS, OFFERS AND DATA SUBMISSION AND PROCESSING	Background	6.1.8 Pursuant to <i>WESM Rules</i> Clause 3.5.11.6, <i>Trading Participants</i> that cancel their <i>bids</i> or <i>offers</i> , or submit <i>bids</i> or <i>offers</i> less than the registered capacity or <i>maximum available capacity</i> of their <i>facility</i> or <i>generating unit</i> are required to provide information on the reasons or circumstances of such cancellation or submission.	6.1.8 Pursuant to <i>WESM Rules</i> Clause 3.5.11.6, <i>Trading Participants</i> that cancel their <i>bids</i> or <i>offers</i> , or submit <i>bids</i> or <i>offers</i> less than the registered capacity or <del><i>maximum available capacity</i></del> of their <i>facility</i> or <i>generating unit</i> are required to provide information on the reasons or circumstances of such cancellation or submission.	<ul style="list-style-type: none"> <li>Trading Participants who cancel their <i>bids/offers</i> or submit <i>bids</i> or <i>offers</i> less than the registered capacity, shall provide reasons or justifications.</li> <li>To harmonize with <i>WESM Rules</i> Clause 3.5.11.6</li> </ul>	Agree.  Proposing to include in Section 6.9.2	<b><u>(f) (new) Reasons or circumstances whenever the submitted market bids or market offers are cancelled or are less than the registered capacity of its facility or generating unit.</u></b>		

**WESM Manual on Dispatch Protocol Issue 16.0**

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
BIDS, OFFERS AND DATA SUBMISSION AND PROCESSING	Revisions of Self-scheduled Nominations, Bids and Offers Based on Reasonable Estimates	6.13 <i>Trading Participants</i> shall revise their <i>self-scheduled nominations, bids, or offers</i> , if the <i>self-scheduled nominations, bids or offers</i> submitted no longer represent a reasonable estimate of either the following:  a. The expected <i>availability</i> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> or <i>scheduled load</i> ; or  b. The <i>loading level</i> ,	6.13 <i>Trading Participants</i> shall revise their <i>self-scheduled nominations, bids, or offers</i> , if the <i>self-scheduled nominations, bids or offers</i> submitted no longer represent a reasonable estimate of either the following:  a. The expected <b><u>status</u></b> and <b><u>availability (e.g., plant breaker status, outage)</u></b> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> or <i>scheduled load</i> <b><u>in relation to its status, such as but not limited to, plant breaker status or commitment state</u></b> ; or  b. <b><u>The attainable capacity as may be affected by the ramp rate limitations</u></b>	<ul style="list-style-type: none"> <li>To include other conditions in revising offers and cite samples</li> <li>To harmonize with the proposed amendment in WESM Rules Clause 3.5.11.5</li> </ul>	<p>For consistency with the aforementioned proposal.</p> <p>Also, NGCP agrees that there is a need to require the Trading Participants to revise/update their offers, if there are changes in the breaker status or the offer cannot be reached with the ramp rate limitations. However, we would like to suggest a further improvement of the process by:</p> <p>1. Prohibiting a Trading Participant with open breaker status from submitting offers.</p>	6.13 <i>Trading Participants</i> shall revise their <i>self-scheduled nominations, bids, or offers</i> , if the <i>self-scheduled nominations, bids or offers</i> submitted no longer represent a reasonable estimate of either the following:  a. The expected <b><u>status</u></b> and <b><u>availability (e.g., plant breaker status, outage)</u></b> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> or <i>scheduled load</i> <b><u>in relation to its status, such as but not limited to, plant breaker status, shutdown/startup procedures or commitment state</u></b> ; or  b. <b><u>The attainable capacity as may be affected by</u></b>		

**WESM Manual on Dispatch Protocol Issue 16.0**

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<i>projected output, bid or offer</i>	<p><b><u>encountered or likely to be encountered by the generating unit during the relevant dispatch interval; or</u></b></p> <p>c. <i>The loading level, projected output, bid or offer.</i></p>		<p>2. Requiring the ramp- rate submissions of Trading Participants to be consistent with their registered or certified ramp-rates.</p> <p>This would ensure that the Trading Participants with open breaker status will not be able to submit offers entirely, and that no schedules will be given for them. As for the ramp-rates, the submission of ramp-rates consistent with the certified or registered values will ensure that the maximum available capacity is attainable and will be meet by the Trading</p>	<p><b><u>the ramp rate limitations encountered or likely to be encountered by the generating unit during the relevant dispatch interval; or</u></b></p> <p>c) <i>The loading level, projected output, bid or offer.</i></p>		

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					Participant should they be scheduled.			
DEFINITIONS, REFERENCES AND INTERPRETATION	Definitions	<p>2.1.2 The following words and phrases as used in this <i>Market Manual</i> shall have the following meaning:</p> <p>a. Ancillary Service Procurement Agreement</p> <p>b. Automatic Generation Control</p> <p>c. Automatic Load Dropping (ALD)</p> <p>d. <b>Availability.</b> The duration of time over a specified period</p>	<p>2.1.2 The following words and phrases as used in this <i>Market Manual</i> shall have the following meaning:</p> <p>a. Ancillary Service Procurement Agreement</p> <p>b. Automatic Generation Control</p> <p>c. Automatic Load Dropping (ALD)</p> <p><del>d. <b>Availability.</b> The duration of time over a specified period that a plant/unit is ready to be in service or operational.</del></p> <p><del>e.</del> Bid</p> <p><del>f.</del> Capability</p> <p><del>g.</del> Cascading Outages</p> <p><del>h.</del> Contingency</p>	<ul style="list-style-type: none"> <li>To refer the definition of terms to WESM Rules</li> <li>Clerical enhancements</li> </ul>	Noted but with proposed revision on the term.			

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		<p>that a plant/unit is ready to be in service or operational.</p> <p>e. xxx</p> <p>.</p> <p>.</p> <p>.</p> <p><b>s. Maximum available capacity.</b> Equal to the registered maximum capacity (Pmax) of the (aggregate) unit less forced unit <i>outages</i>, scheduled unit <i>outages</i>, de-rated capacity due to <i>technical constraints</i> and weather disturbance that cause damage to the unit or that would otherwise limit its ability to inject power to</p>	<p><del>ih.</del> Contingency Reserve</p> <p><del>ji.</del> Demand Control</p> <p><del>kj.</del> Demand Control Imminent Warning</p> <p><del>lk.</del> Dispatchable Reserve</p> <p><del>ml.</del> Disturbance</p> <p><del>nm.</del> Frequency control</p> <p><del>on.</del> Generator</p> <p><del>po.</del> Load shedding</p> <p><del>qp.</del> Manual Load Dropping</p> <p><del>rq.</del> Market Management System (MMS)</p> <p><b>s. Maximum available capacity.</b> Equal to the registered maximum capacity (Pmax) of the (aggregate) unit less forced unit <i>outages</i>, scheduled unit <i>outages</i>, de-rated capacity due to <i>technical constraints</i> and weather disturbance that cause damage to the unit or that would otherwise limit its ability to inject power to the <i>grid</i>. For <i>co-generation systems</i>, the</p>					

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		<p>the <i>grid</i>. For co-generation systems, the <i>maximum available capacity</i> is further determined by taking into account the equivalent power of the thermal <i>energy</i> extraction by the <i>energy</i> host and <i>technical constraints</i>.</p> <p>t. xxx</p> <p>.</p> <p>.</p> <p>.</p> <p><b>jj. Technical Constraint.</b> Refers to plant equipment-related failure, limitations encountered during <i>start-up/shutdown</i></p>	<p><del><i>maximum available capacity</i></del> is further determined by taking into account the equivalent power of the thermal <del><i>energy</i></del> extraction by the <del><i>energy</i></del> host and <del><i>technical constraints</i></del>.</p> <p><del>t</del>r. MMS-Market Participant Interface (MPI)</p> <p><del>u</del>s. Multiple Outage Contingency</p> <p><del>v</del>t. Offer</p> <p><del>w</del>u. Operating Margin</p> <p><del>x</del>v. Preferential Dispatch Units</p> <p><del>y</del>w. Real-Time Data</p> <p><del>z</del>x. Real-Time Dispatch</p> <p><del>aa</del>y. Red Alert</p> <p><del>bb</del>z. Regulating Reserve</p> <p><del>cc</del>aa. Security</p> <p><del>dd</del>bb. Self-scheduled nomination</p> <p><del>ee</del>cc. Shutdown</p>					

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		procedure, effects of ambient temperature and resource-related <i>constraints</i> due to the following: (a) water elevation and diversion requirements for domestic or irrigation use for hydro plants; (b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants; (c) unavailability of fuel resources that are not within the control of the <i>Generation Company</i> for biomass power plants; and (d) steam flow limitations, station <i>load</i> , and electricity	<del>ffdd.</del> Stability <del>ggge.</del> Start-up <del>hhff.</del> System Integrity Protection Scheme (SIPS) <del>igg.</del> System Operator System Advisories jj. <b>Technical Constraint.</b> Refers to plant equipment-related failure, limitations encountered during <i>start-up/shutdown</i> procedure, effects of ambient temperature and resource-related <i>constraints</i> due to the following: (a) water elevation and diversion requirements for domestic or irrigation use for hydro plants; (b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants; (c) unavailability of fuel resources that are not within the control of the <i>Generation Company</i> for biomass power plants;					

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		demand of its <i>energy</i> host, in the case of the co-generation systems.  kk. xxx  ll. xxx  mm. xxx	<del>and (d) steam flow limitations, station load, and electricity demand of its <i>energy</i> host, in the case of the co-generation systems.</del>  <b>kk</b> <u>hh</u> . Voltage Control  <b>ll</b> <u>jj</u> . Voltage Instability  <b>mm</b> <u>jj</u> . Voltage Sag					

*Note: Please underline and put in bold letters the proposed changes to the Market Rules or Manual.*