

ORCP-WR-WM-22-12

**Call for Comments to the Proposed General Amendments to the WESM Rules and WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units (FAS Manual) on Matters Relating to Enforcement Proceedings and Actions (ORCP-WR-WM-22-12)**

The Rules Change Committee (RCC) is inviting all WESM Members and interested parties to submit comments to the PEM Board-approved *Proposed General Amendments to the WESM Rules and WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units (FAS Manual) on Matters Relating to Enforcement Proceedings and Actions (ORCP-WR-WM-22-12)*.

The proposed amendments seek to:

1. address the gap between the FAS Manual and the actual procedures and practices being adopted to implement the provisions of the said Manual;
2. ensure compliance with the requirements set forth in the DOE DC2022-05-0015<sup>1</sup> that seeks to include in the FAS-related enforcement proceedings/actions the must dispatch generating units with issued FCATC;
3. define with more clarity the reference data for the calculation of the forecast percentage error and other terms used in the Manual;
4. address some unique conditions, situations, or circumstances affecting the compliance of the must dispatch generating units but are not otherwise included in the current FAS Manual;
5. give considerations or exemptions for some plants who have just commenced operations and have low chance of passing the mean absolute percentage error (MAPE) or the Percentile 95 of the forecasting error (Perc95) due to their limited time of participation in the WESM within the subject monitoring year; and
6. add provisions that will promote due process before any sanction is imposed relative to a finding of breach of MAPE and PERC95.

The WESM documents for amendments are:

- 1) WESM Rules; and
- 2) WESM Manual on Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units (FAS Manual)

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<sup>1</sup> "Pending the issuance of the COC by the ERC, a Generation Company that has been **issued with a final CATC** may be allowed to continue to operate and be compensated as price taker in the market, unless the ERC issues an Order for the Generation Company's immediate disconnection from the grid.

For this purpose, the Generation Company's dispatch shall be in accordance with the following:

4.4.5.1 For Variable Renewable Energy, the Generation Company shall x x x **comply with applicable forecast accuracy standards;** xxx" DOE DC2022-05-0015 (Emphasis supplied).

## **BACKGROUND:**

The proposed amendments were originally initiated by PEMC on 10 November 2022 by way of the rules change process for urgent amendments. Following the procedures for processing urgent proposals set forth in Section 7 of the Rules Change Manual, the RCC certified the proposal as urgent, immediately deliberated on the proposal on 14 November 2022, and approved it on 18 November 2022.

Activity	Date
RCC Approval	18 November 2022
PEM Board Approval	23 November 2022
Effectivity Date of Revised Rules and Manuals	25 November 2022

The urgent amendments shall remain in effect up to 6 months or until a general amendment on the same matter has been approved by the DOE and becomes continuously in effect, whichever comes first. The updated market rules and manuals could be accessed in this [webpage](#).

## **DOCUMENTS:**

Provided below are the relevant materials for your reference:

- 1) [Original Rules Change Proposal submitted by PEMC \(ORCP-WR-WM-22-09\)](#)
- 2) [PEM Board-approved urgent proposal \(RCC Resolution No. 2022-13\)](#)
- 3) Matrix of Proposed Amendments for Comments - Annexes A to B of this document  
(See below. Please write your comments in the proper columns in the matrix.)

Kindly submit your comments (in Word format) by e-mail at [mag\\_rrd@wesm.ph](mailto:mag_rrd@wesm.ph) no later than **27 January 2023** or 30 working days from the date of publication (14 December 2022).

Thank you.

For the Rules Change Committee,

### **Rules Review Division**

Market Assessment Group

### **Philippine Electricity Market Corporation**

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**I. Proponent's Information (for the Party Submitting the Comments)**

Name and Signature	
Designation	
Company	
Company Address	
Telephone No.	
Fax. No.	
Email Address	

WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
					<p>Please write general comments here, if any. <u>General Comment/Inquiry:</u></p> <p><u>1. Whose data (e.g. Actual Load) shall prevail in the calculation in case of a discrepancy between the plant data and the market data? It has been observed at times that data transmission is a potential point of failure (e.g. non-updating).</u></p> <p><u>2. We suggest to clarify and to specify what constitutes adequate supporting documents because sometimes the</u></p>			

Annex A

WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
					<u>actual load readings in logbooks are not being accepted as sufficient. Actual DCS screenshots may no longer be possible due to retention limitations.</u>  <u>3. Another frequent instance observed is the NULL PO data in the CPEMS despite having a value in the NMMS (e.g Ampohaw 09.09.2022 at 0135H and 0700H). Raw nomination excel files were not also accepted as sufficient supporting documents. The NMMS historical PO data is only limited to the previous 7 days.</u>			

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WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
Section 3.5.5 Generation Offers and Data	3.5.5.10	A Trading Participant who fails to meet the requisite forecast accuracy standards set out in accordance with Clause 3.5.5.8 in respect of projected outputs for a must dispatch generating unit submitted under Clause 3.5.5.5 may be liable for sanctions imposed under	A Trading Participant who fails to meet the requisite forecast accuracy standards set out in accordance with Clause 3.5.5.8 <b><u>based on an annual assessment and results</u></b> in respect of <del>projected outputs for a must dispatch generating unit submitted under</del> Clause 3.5.5.5 may be liable for sanctions imposed under Clause 7.2.	For clarity. ECO monitors monthly and annually. Only the failed <b><u>annual</u></b> rating shall be subject to sanctions.  Deleted part – redundant; it is already stated in the referred clause 3.5.5.8				

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WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
		Clause 7.2.						
	3.5.5.11	The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> the monthly and annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with	The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> , <b><u>the Compliance Committee</u></b> , and the <i>DOE</i> the monthly and annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to its <i>projected outputs</i> .	To include CC to whom ECO reports as part of the Committee's oversight functions.				

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WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
		respect to its <i>projected outputs.</i>						
	3.5.5.12	The <i>Market Operator</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> the monthly and annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to its	<del>The <i>Market Operator</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> the monthly and annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to its <i>projected outputs.</i></del>	Redundant provision. Under Clause 3.5.5.11, ECO shall perform this task.				

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WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
		<i>projected outputs.</i>						
Section 7.2 Enforcement	7.2.10	All <i>WESM Member</i> shall be exempted from an investigation and imposition of sanctions for probable <i>breach</i> that are committed –  (a) Within the first one (1) month of membership in the <i>WESM</i> by said <i>WESM Member</i> ; or  (b) Within the first one (1) month of the issuance of a new provision of the <i>WESM Rules</i> or a new <i>Market Manual</i> , or an amendment thereto, with respect to such new provisions, <i>Market Manual</i> or amendment, if non-	<u>Unless otherwise provided in the relevant <i>Market Manual</i>, All <i>WESM Members</i></u> shall be exempted from an investigation and imposition of sanctions for probable <i>breach</i> that are committed –  x x x	To allow flexibility in setting a different exemption period when the Market Manual provides for a more practicable provision or consideration.  Note: Under the WESM Rules, one-month exemption is provided. In the proposed FAS Manual, an exemption is provided if the plant is in operation for 3 months or less prior to the end of the covered monitoring year. (See related proposal, Section 4.6.2 [b] of the FAS Manual)				

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WESM Rules								
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		compliance with the same amounts to a <i>breach</i> .  Notwithstanding, the <i>DOE</i> may issue a longer exemptio n period as it may deem necessar y, to ensure the readiness of the <i>WESM</i> <i>Members</i> and in the implemen tation of a new policy or program that directly impacts the enforcem						

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WESM Rules								
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		ent of the <i>WESM Rules</i> and its <i>Market Manuals</i> . For this purpose, the <i>DOE</i> shall issue an advisory to the <i>Governan ce Arm</i> providing such details of exemptio n as necessar y.						
Chapter 11 GLOSSARY		<b>Must Dispatch Generating Unit.</b> A <i>Generating Unit</i> or <i>Generating System</i> so designated by the <i>Market Operator</i> under Clause 2.3.1.5 and is provided <i>Must Dispatch</i> .	<b>Must Dispatch Generating Unit.</b> A <i>Generating Unit</i> or <i>Generating System</i> so <del>designated by the <i>Market Operator</i></del> <b><u>certified by the DOE as must dispatch generating unit</u></b> under Clause 2.3.1.5 and is	Use of more appropriate terms.  Section 2.3.1.5 speaks of certification by the DOE rather than designation by the Market Operator.				

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WESM Rules								
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			<del>provided Must Dispatch</del> <b><u>registered as such in the WESM by the Market Operator.</u></b>					

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Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units (FAS Manual)								
Title	Section	Provision	Proposed Amendment	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
					Please write general comments here, if any.			
SECTION 1 – INTRODUCTION  1.1. Background	1.1.3	[NEW]	<b><u>A Generation Company that has secured a Final Certificate of Approval to Connect for completing the conduct of test and commissioning but with pending issuance of Certificate of Compliance from the ERC for its must dispatch generating unit shall comply with the forecast accuracy standards in respect of its projected outputs.<sup>2</sup></u></b>	To reflect the provisions of DOE DC 2022-05-0015 as regards MDGUs' obligation to comply with forecast accuracy standards				
SECTION 1 – INTRODUCTION  1.1. Background	1.1.4	[NEW]	<b><u>A Generation Company that has an expansion unit shall likewise comply with the forecast accuracy standards following the parameters set forth in Section 4.2.8 of this Manual.</u></b>	To consider the monitoring of a MDGU with expansion unit, i.e., facility with same plant substation and revenue meter; and				

<sup>2</sup> Section 4.4.5 of the DOE DC2022-05-0015 “Supplementing Department Circular No. DC2021-06-0013 on the Framework Governing Test and Commissioning of Generation Facilities for Ensuring Readiness to Deliver Energy to the Grid or Distribution Network” Published in June 2022

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Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units (FAS Manual)								
Title	Section	Provision	Proposed Amendment	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
				to comply with the requirements under				
SECTION 1 – INTRODUCTION  1.1. Background	1.1.3	A Trading Participant who fails to meet the requisite forecast accuracy standards in respect of projected outputs for a must dispatch generating unit may be liable for sanctions imposed under Clause 7.2 of the WESM Rules.	<del>4.1.3</del> <b>1.1.5</b> A Trading Participant <b>referred to in Sections 1.1.2, 1.1.3, and 1.1.4 hereof, who</b> which fails to meet the requisite forecast accuracy standards in respect of projected outputs for a must dispatch generating unit may be liable for sanctions imposed under Clause 7.2 of the WESM Rules <b>and the WESM Penalty Manual.</b>	<ul style="list-style-type: none"><li>Renumbered to <b>1.1.5</b> with modification</li><li>For clarity. MDGUs with FCATC are already liable for sanctions in case of violations / breach of FAS.</li></ul>				
SECTION 1 – INTRODUCTION	1.1.4	Moreover, the Enforcement and Compliance	<del>4.1.4</del> <b>1.1.6</b> Moreover, the Enforcement and Compliance Office is required by the WESM	<ul style="list-style-type: none"><li>Renumbered to <b>1.1.6</b></li></ul>				

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Title	Section	Provision	Proposed Amendment	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
1.1. Background		<i>e Office is required by the WESM Rules report to the PEM Board and the DOE the annual compliance of each must dispatch generating unit to the forecast accuracy standards with respect to its projected outputs.</i>	<i>Rules <u>to</u> report to the PEM Board, <u>the Compliance Committee</u>, and the DOE the annual compliance of each must dispatch generating unit to the forecast accuracy standards with respect to its projected outputs.</i>	<ul style="list-style-type: none"><li>• To include CC's oversight functions.</li><li>• There is also a corresponding change in WESM Rules Clause 3.5.5.11</li></ul>				
SECTION 2 DEFINITIONS, REFERENCES, AND INTERPRETATION  2.1 Definitions	2.1.2	<b><u>a) (new)</u></b>	<b><u>a) Expansion Unit. It shall refer to the expanded capacity of a must-dispatch generating unit or that built in phases and is designed to have the same plant substation</u></b>	<p>To clarify the term used in the Manual.</p> <p>To cover the expanded unit in the assessment of the FAS compliance of the MDGUs.</p>				

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			<u>and revenue meter as the existing capacity unit.</u>					
SECTION 2 DEFINITIONS, REFERENCES, AND INTERPRETATION  2.1 Definitions	2.1.2	<b><u>b) (new)</u></b>	<b><u>b) Forecast Accuracy Standards Report. Reports which are prepared and issued by the Enforcement and Compliance Office, as prescribed in Section 4.4 of this Manual.</u></b>	For reference to the type/s of report that ECO needs to prepare/issue in compliance with FAS Manual.				
SECTION 2 DEFINITIONS, REFERENCES, AND INTERPRETATION  2.1 Definitions	2.1.2	<b>a) Forecast percentage error.</b> Error (in %) of the <i>projected output</i> submitted by a <i>must dispatch generating unit</i> with respect to its maximum <i>metered quantity</i> over a <i>billing period</i> as dependable capacity and calculated in accordance with Section 4.2.3.	<del>a)</del> <b><u>c) Forecast percentage error.</u></b> Error (in %) of the <i>projected output</i> submitted by a <i>must dispatch generating unit</i> with respect to its maximum <i>metered quantity</i> over a <i>billing period</i> as dependable capacity and calculated in accordance with Section 4.2.3.	Clerical correction. Renumbered to <b><u>c</u></b>				

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Title	Section	Provision	Proposed Amendment	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
	2.1.2	<b>b) Initial loading.</b> Loading (in MW) for the beginning of the <i>dispatch interval</i> assumed in, or estimated by, the dispatch optimization performed prior to the beginning of that <i>dispatch interval</i> .	<del>b)-d)</del> <b><u>d) Initial loading.</u></b> <del>Loading (in MW) for the beginning of the <i>dispatch interval</i> assumed in, or estimated by, the dispatch optimization performed prior to the beginning of that <i>dispatch interval</i>. It</del> <b><u>shall refer to the previous <i>dispatch schedule</i> of the <i>must dispatch generating unit</i>. For example, the initial loading for 0105H shall be the <i>dispatch schedule</i> for 0100H.</u></b>	To reflect the nearest reference to the load for the beginning of the dispatch interval – which is more appropriate for MDGUs.  Note: the IL as originally defined is more appropriate for use by the conventional plants/facilities.  Clerical correction. Renumbered to <b><u>d</u></b>				
	2.1.2	<b>c) MAPE.</b> Abbreviation of <i>mean absolute percentage error</i> .	<del>e)-e)</del> <b><u>e) MAPE.</u></b> x x x	Clerical correction. Renumbered to <b><u>e</u></b>				
	2.1.2	<b>d) Mean absolute percentage error.</b> Mean of the <i>forecast percentage errors</i> of a <i>must dispatch generating unit</i> over a certain period calculated in	<del>d)-f)</del> <b><u>f) Mean absolute percentage error.</u></b> x x x	Clerical correction. Renumbered to <b><u>f</u></b>				

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Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units (FAS Manual)								
Title	Section	Provision	Proposed Amendment	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
		accordance with Section 4.2.1.						
	2.1.2	<b>e) Must dispatch generating unit.</b> A <i>generating unit</i> so designated by the <i>Market Operator</i> under clause 2.3.1.5 of the <i>WESM Rules</i> and is provided <i>Must Dispatch</i> . For brevity and when the context applies, this also refers to a <i>generation company</i> that operates a <i>must dispatch generating unit</i> in this <i>Market Manual</i> .	<del><b>e) Must dispatch generating unit.</b> A <i>generating unit</i> so designated by the <i>Market Operator</i> under clause 2.3.1.5 of the <i>WESM Rules</i> and is provided <i>Must Dispatch</i>. For brevity and when the context applies, this also refers to a <i>generation company</i> that operates a <i>must dispatch generating unit</i> in this <i>Market Manual</i>.</del>	Deleted since this is already defined in WESM Rules				
	2.1.2	<b>f) Perc95.</b> Abbreviation of <i>percentile 95 of the forecasting error</i> .	<del>f) <b>g) Perc95.</b></del> Abbreviation of <del><i>p</i></del> <b>Percentile 95 of the forecasting error.</b>	Clerical correction. Renumbered to <b>g</b>				
	2.1.2	<b>g) Percentile 95 of the forecasting error.</b> The value (in %) not exceeding 95% of the <i>forecast percentage errors</i> of the <i>must dispatch generating unit</i> during a certain period (see Section 6,	<del>g) <b>h) Percentile 95 of the forecasting error.</b></del> x x x	Clerical correction. Renumbered to <b>h</b>				

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Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units (FAS Manual)								
Title	Section	Provision	Proposed Amendment	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
		Appendix A of this Manual).						
	2.1.2	<b>h) Projected quantity.</b> Estimated <i>generation of a must dispatch generating unit</i> over a <i>dispatch interval</i> based on its submitted <i>projected output</i> assuming linear ramping calculated in accordance with Section 4.2.4.	<b>h) i) Projected quantity.</b> x x x	Clerical correction. Renumbered to <b>i</b>				
	2.1.2	<b>i) Transition Period.</b> The period specified by the <i>DOE</i> wherein the provisions under Section 4.5 shall apply.	<b>i) j) Transition Period.</b> The period specified by the <del>DOE</del> wherein the provisions under 4.5 shall apply <b><u>referred to in Section 4.5 of this Manual.</u></b>	Provide for the specific duration of transition for clarity.  Section 4.5 – 6 months from implementation of the EWDO.				
<b>SECTION 3 – RESPONSIBILITIES</b>  <b>3.1 Enforcement</b>	3.1.1	The <i>Enforcement and Compliance Office</i> shall evaluate annually	The <i>Enforcement and Compliance Office</i> shall <b><u>assess,</u></b> evaluate annually <b><u>and issue the cumulative results of MAPE and PERC95 to</u></b>	For consistency with Section 4.4.2 (renumbered to 4.4.5) of this Manual -requiring <u>monthly</u> reporting; and				

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Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units (FAS Manual)								
Title	Section	Provision	Proposed Amendment	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
and Compliance Office		the compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards in this <i>Market Manual</i>	<del>compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards in this <i>Market Manual</i>.</del> <b><u>on a monthly and annual basis in accordance with the procedures set forth in Section 4.4 hereof.</u></b>  <b><u>The Enforcement and Compliance Office shall, for this purpose, establish a detailed process or procedure of compliance monitoring and assessment and prescribe a reply format or template that may be accomplished by the Generation Company as part of the monitoring process.</u></b>	Section 4.4.1 (renumbered to 4.4.6) -requiring <u>annual</u> reporting  2 <sup>nd</sup> paragraph – to integrate current process as would allow ECO to efficiently gather adequate data, information, or evidence from the trading participants.				
	3.1.2	The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> its	The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> , <b><u>the Compliance Committee,</u></b> and the <i>DOE</i>	Included Compliance Committee in view of its oversight functions.  Reference to Section 4.4.6, as renumbered				

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Procedures for the Monitoring of Forecast Accuracy Standards for Must Dispatch Generating Units (FAS Manual)								
Title	Section	Provision	Proposed Amendment	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
		evaluation on the annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to each <i>must dispatch generating unit's</i> projected outputs	its evaluation on the annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards <b><u>as set forth in Section 4.4.6 of this Manual</u></b> —with respect to each <i>must dispatch generating unit's</i> projected outputs	(previously Section 4.4.1)				
3.4 Generation Companies	<b><u>3.4.3</u></b>	[NEW]	<b><u>Generation companies shall coordinate with the Enforcement and Compliance Office for matters, data, or information</u></b>	To integrate the current process; to ensure that all the data/information used in the calculation of FAS results are verified/validated. This requires active participation of the trading participants.				

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			<u>necessary to establish, validate, and verify the incidents or circumstances referred to in Sections 4.3, and such other matters, data, or information relative to the calculation of MAPE and PERC95.</u>	Due process requirement.				
3.5 Market Operator	<b><u>3.5.2</u></b>	[NEW]	<u>The Market Operator shall provide to the Enforcement and Compliance Office all the market data and information necessary for the calculation of MAPE and PERC95 and for verification or validation of data, when necessary.</u>	To integrate the current practice. All market data used in the calculation of FAS by ECO are obtained from IEMOP.				

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Title	Section	Provision	Proposed Amendment	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
SECTION 4 – FORECAST ACCURACY STANDARDS AND PROCEDURES			SECTION 4 – FORECAST ACCURACY STANDARDS, <u>AND</u> <u>PROCEDURES, AND SANCTIONS</u>	To align the title with the additional proposed sub-section on sanctions (Section 4.6)				
4.1 Standards	4.1.2	The <i>MAPE</i> and <i>Perc95</i> of each <i>must dispatch generating unit</i> shall be calculated over the period starting on the 26 <sup>th</sup> of December of a year and ending on the 25 <sup>th</sup> of December of the succeeding year.	The <i>MAPE</i> and <i>Perc95</i> of each <i>must dispatch generating unit</i> shall be calculated <u><b>every billing period in cumulative results and shall be reported to each Generation Company within the timeline prescribed in Section 4.4 hereof. The annual cumulative results covering</b></u> <del>over the period starting on the 26<sup>th</sup> of December of a year and ending on the 25<sup>th</sup> of December of the succeeding year</del> <u><b>shall be determined with finality by the Enforcement and Compliance Office within the period prescribed in Section 4.4.6 of this Manual</b></u>	To integrate the current procedure (due process requirement):  Issuance of Monthly FASR – to afford the Generation Companies the opportunity to see the results, provide relevant data as basis for recalculation, if any, and be able to catch up by improving its performance in the succeeding months.				

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	4.1.3	Subject to Section 4.5 of this <i>Market Manual</i> , must dispatch generating units who fail to meet the requisite forecast accuracy standards set out in Section 4.1.1 of this <i>Market Manual</i> may be liable for sanctions imposed under Clause 7.2 of the <i>WESM Rules</i> , and in accordance with the	Subject to Sections <u>4.5 and 4.6</u> of this <i>Market Manual</i> , <u>the Generation Companies of the must dispatch generating units</u> <del>who</del> <u>which</u> fail to meet the requisite forecast accuracy standards <u>based on the annual Forecast Accuracy Standards Report shall be considered in breach of</u> <del>set out in</del> Section 4.1.1 of this <i>Market Manual</i> <u>and</u> may be liable for sanctions imposed under Clause 7.2 of the <i>WESM Rules</i> , and in accordance with the <i>WESM Penalty Manual</i> .	For clarity – only the breach based on annual (final) FAS results shall be subject to sanctions per WESM Penalty Manual.				

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Title	Section	Provision	Proposed Amendment	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
		<i>WESM Penalty Manual.</i>						
4.2 Calculations	4.2.6	A one hundred (100) percent FPE shall be imposed to a must dispatch generating unit for non-submission of projected output.	A one hundred (100) percent FPE shall be imposed to a must dispatch generating unit for non-submission of projected output. <b><u>The non-submission of projected output referred to in this section shall exclude submission of zero (0) MW nomination or cancellation of nomination based on the zero projection or load profile of the must dispatch generating unit.</u></b>	To distinguish active nomination of zero (0) MW or cancellation of nomination due to unavailability of the plant, from the non-submission at all.				
	4.2.8	[NEW]	<b><u>For generating plants with expansion unit that is either on test and commissioning or in actual operation, as may</u></b>	To address changes and possible constraints in the nominations, meter readings of the				

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			<p><u>be allowed by the rules, but is awaiting the issuance of the Certificate of Compliance or the Provisional Authority to Operate, the following shall apply:</u></p> <p><u>a) A zero (0) FPE shall be imposed if the projected quantity is less than the combined metered quantity.</u></p> <p><u>b) A one hundred (100) FPE shall be imposed if the projected quantity is greater than the combined metered quantity.</u></p> <p><u>For this purpose, the combined metered quantity shall refer to the sum of the metered quantity of the existing capacity unit and that of the expansion unit.</u></p> <p><u>This provision shall apply until the registered Pmax of the</u></p>	<p>existing unit, and additional unit while the latter is on test and commissioning stage or before the commercial operation registration.</p> <p>Note: The IEMOP cannot update the Pmax of the generating facility (original capacity plus expanded capacity) in the WESM registration unless the same is supported by COC/PAO even if it had been issued with FCATC already. The generation company could not yet nominate its full/combined capacity in the MMS-MPI. Meanwhile, the meter reading already reflects the total capacity. In</p>				

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			<u>power plant or facility is updated in the WESM to include both the capacity of the existing and expansion unit.</u>	such a situation, the generation company would be adversely affected by the results of the FPE if it will be based on the normal computation.				
4.3 Exclusions			4.3 Exclusions <u>and Other Basis for Recalculation</u>	Align the title with the additional provisions under this Sub-section				

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	4.3.2	[NEW]	<b><u>Any variance in the market data used in the calculation of <i>MAPE</i> and/or <i>PERC95</i> that may be discovered during the monitoring and assessment must be properly addressed, validated, and verified within the prescribed timeline. The <i>Generation Company</i> shall provide adequate supporting documents to substantiate any claim of data variance. Only those data that have been proven and verified to be inaccurate, inconsistent, or erroneous shall be considered in the recalculation of the results.</u></b>	<p>To address the recurring problem on data inconsistency, non-updating, or variance.</p> <p>Due process requirement.</p>		<p><u>Any variance in the market data used in the calculation of <i>MAPE</i> and/or <i>PERC95</i> that may be discovered during the monitoring and assessment shall be addressed before the release of the Annual FAS results.</u></p> <p><u>The <i>Generation Company</i> shall provide adequate supporting documents to substantiate any claim of data variance. Only those data that have been proven and verified to be inaccurate, inconsistent, or erroneous shall be considered in the recalculation of the results.</u></p>		

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4.4. Monitoring, Reporting, and Review	4.4.1	[NEW]	<u>The <i>Enforcement and Compliance Office</i> shall monitor the compliance of the <i>Generation Company</i> of each <i>must dispatch generating unit</i>, calculate the MAPE and PERC95 and issue the Preliminary Forecast Accuracy Standards Reports including the data used in the calculation within 30 business days from the end of the calendar month of the covered monitoring period. For instance, the Preliminary Forecast Accuracy Standards Report for September billing period shall be issued not later than 30 October.</u>	To provide general provision on monitoring and issuance of preliminary results to the trading participants.				

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	4.4.2	[NEW]	<b><u>The Generation Company shall provide a reply or confirmation of the MAPE and PERC95 results, as the case may be, to the Enforcement and Compliance Office within fifteen (15) business days from receipt of the Preliminary Forecast Accuracy Standards Report. If any of the circumstances fall within the exclusions and data variance under Section 4.3 of this Market Manual, the Generation Company shall likewise provide and submit the documents or proof thereof as basis for recalculation of the results.</u></b>	<p>To afford the participants the opportunity to check the results and provide adequate basis for recalculation of the results, as may be allowed under Section 4.3 of the Manual</p> <p>Due process requirement</p>	<p><u>We suggest a reasonable timeline for the participants to file a reply or confirmation of the MAPE and PERC95 results considering the volume of the data to be validated.</u></p>	<p><u>The Generation Company shall provide a reply or confirmation of the MAPE and PERC95 results, as the case may be, to the Enforcement and Compliance Office within the following periods from receipt of the Preliminary Forecast Accuracy Standards Report:</u></p> <p><u>1. fifteen (15) business days if the subject validation constitutes one (1) billing month; or</u></p> <p><u>2. thirty (30) business days if the subject validation constitutes two (2) billing months. Additional</u></p>		

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						<u>reasonable period shall be given to the concerned Generation Company if the subject validation constitutes three (3) or more billing periods.</u>  <u>If any of the circumstances fall within the exclusions and data variance under Section 4.3 of this Market Manual, the Generation Company shall likewise provide and submit the documents or proof thereof as basis for recalculation of the results.</u>		
	<b><u>4.4.3</u></b>	[NEW]	<b><u>The Enforcement and Compliance Office shall assess, validate, and verify the responses and documents submitted by the Generation</u></b>	To ensure that there is adequate basis for recalculation.  Due process requirement				

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			<u><b>Company. It may also consult the Market Operator, the System Operator, or the Metering Service Provider, as necessary, to ascertain the truthfulness of the claim or allegations of the Generation Company. The Enforcement and Compliance Office shall perform the recalculation, as may be appropriate.</b></u>					
	<b>4.4.4</b>	[NEW]	<u><b>The Enforcement and Compliance Office shall issue the Final Forecast Accuracy Standards Report within seventy (70) business days from the end of the calendar month of the covered monitoring period regardless of whether a reply or confirmation is submitted by the concerned Generation Company or whether a recalculation of the results was performed</b></u>	To issue the final monthly results after recalculation. The ECO is mandated to issue the Final monthly reports – with or without change from preliminary results as official reference for the monthly performance or compliance of the MDGU.	<u>We suggest a provision for a periodic request for reconsideration against the monthly publication of the Final FAS which is aligned with the similar remedy provided for by the Penalty Manual 1.0.</u>	<u>The Enforcement and Compliance Office shall issue the Final Forecast Accuracy Standards Report within seventy (70) business days from the end of the calendar month of the covered monitoring period regardless of whether a reply or confirmation is submitted by the</u>		

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			<u>for a particular <i>must dispatch</i> generating unit.</u>			<u>concerned Generation Company or whether a recalculation of the results was performed for a particular must dispatch generating unit.</u>  <u>In case of the concerned Generation Company may request for reconsideration of the results of the Final FAS, subject to the following conditions: a) The request shall be filed within fifteen (15) Business Days from the receipt of the said notice; b) A request for reconsideration shall be based on the ground that</u>		

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						<u>the finding of breach is not supported by substantial evidence; and/or the computation is incorrect or the penalties imposed are not in accordance with the Penalty Manual and Market Rules; c) The request for reconsideration shall be filed with the Enforcement and Compliance Office.</u>		
	4.4.1	4.4.1 The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> the annual compliance of each <i>must dispatch generating unit</i> to the forecast accuracy standards with respect to its <i>projected outputs</i> within two (2) calendar months after the end of	4.4.1 <u><b>4.4.5</b></u> The <i>Enforcement and Compliance Office</i> shall <u><b>submit a consolidated monthly</b></u> report to the <i>PEM Board</i> , <u><b>the Compliance Committee,</b></u>	<ul style="list-style-type: none"><li>• Re-arranged for coherence. Previously Section 4.4.2 with modification</li><li>• Renumbered to <u><b>4.4.5</b></u></li><li>• Included Compliance Committee in view of its oversight functions.</li></ul>				

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		the period specified in Section 4.1.2.	and the <i>DOE</i> <b><u>containing</u></b> the status of the compliance of each <i>must dispatch generating unit</i> to the <i>forecast accuracy standards</i> as of the most recent <i>Billing Period</i> with a <i>final statement</i> on a <i>monthly basis</i> <b><u>based on the Final Forecast Accuracy Standards Report within the same timeline provided in Section 4.4.4 of this Manual.</u></b>					

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	4.4.2	4.4.2 The <i>Enforcement and Compliance Office</i> shall report to the <i>PEM Board</i> and the <i>DOE</i> the status of the compliance of each <i>must dispatch generating unit</i> to the <i>forecast accuracy standards</i> as of the most recent <i>Billing Period</i> with a <i>final statement</i> on a monthly basis.	4.4.2 <b><u>4.4.6</u></b> The <i>Enforcement and Compliance Office</i> shall <b><u>likewise submit an annual consolidated report to the PEM Board the Compliance Committee,</u></b> and the <i>DOE</i> <del>the annual compliance of each must dispatch generating unit to the forecast accuracy standards with respect to its projected outputs within two (2) calendar months after the end of the period specified in Section 4.1.2.</del> <b><u>on or before 31 March of the year following the covered monitoring period.</u></b>	<ul style="list-style-type: none"><li>• Re-arranged for coherence. Previously Section 4.4.1 with modification</li><li>• Renumbered to <b><u>4.4.6</u></b></li><li>• Provide a more definitive period for compliance</li><li>• Proposed period based on the calculated period to process one whole year of data.</li><li>• Included Compliance Committee in view of its oversight functions.</li></ul>				
	4.4.3	4.4.3 The <i>Market Operator</i> shall review annually the <i>forecast accuracy standards</i> set in	4.4.3 <b><u>4.4.7</u></b> The <i>Market Operator or the Enforcement and Compliance Office</i> shall review annually the <i>forecast accuracy standards</i> set in Section 4.1 and shall provide recommendation to the <i>PEM Board</i> and the <i>DOE</i> .	<ul style="list-style-type: none"><li>• Renumbered to <b><u>4.4.7</u></b></li><li>• To include ECO being the office in charge of the monitoring of FAS.</li></ul>				

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		Section 4.1 and shall provide recommendation to the <i>PEM Board</i> and the <i>DOE</i> .						
4.5 Transition Period	4.5.1	A <i>transition period</i> covering the period specified by the <i>DOE</i> shall be implemented. The sanction on the non-compliance with the forecast accuracy standards shall be implemented upon the commercial operation of the enhanced <i>WESM</i> design and operations.	A <i>transition period</i> <u>shall be six (6) months</u> covering the period specified by the <i>DOE</i> shall be implemented. The sanction on the non-compliance with the forecast accuracy standards shall be implemented upon <u>from</u> the commercial operation of the enhanced <i>WESM</i> design and operations <u>unless extended by the DOE through appropriate issuance.</u>	To reflect the current practice (as consulted with DOE – DOE will no longer issue formal issuance re: lifting of transition period; and the monitoring officially starts in January 2022 billing period).  Given that the annual FAS rating is reckoned from 26 December of the year until 25 December of the succeeding year, the annual FAS rating could NOT be computed for 2021 as the EWDO				

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				commenced only on 26 June 2021 (or short of 6 months for annual rating).  The annual FAS rating (Jan to Dec billing period) could be computed beginning January 2022				
	4.5.3	Before the end of the <i>transition period</i> , the <i>Market Operator</i> shall submit to the <i>DOE</i> and other concerned government agencies a report on the compliance of <i>must dispatch generating units</i> to the	Before the end of the <i>transition period</i> , the <del><i>Market Operator</i></del> <b><u>Enforcement and Compliance Office</u></b> shall submit to the <i>DOE</i> and other concerned government agencies a report on the compliance of <i>must dispatch generating units</i> to the	For consistency with Responsibilities of ECO under Section 3.1 of this Manual.  Not included in the PEM Board's approved Urgent amendments (RCC Reso 2022-13)				

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		forecast accuracy standards, and it shall inform the <i>must dispatch generating units</i> on their performance with respect to the forecast accuracy standards.	forecast accuracy standards, and it shall inform the <i>must dispatch generating units</i> on their performance with respect to the forecast accuracy standards.					
4.6 PENALTIES AND SANCTIONS		[NEW]	New sub-section	For clarity of the application of the penalty based on possible sets of circumstances.				
	4.6.1	[NEW]	<b><u>One breach is counted for each category of forecast accuracy standard that was not complied with based on the Annual Forecast Accuracy Standards Report. The breach of MAPE and PERC95 shall</u></b>	For clarity: separate finding for MAPE and PERC95; and separate penalty imposition; consistent with the provisions of the WESM Penalty Manual.				

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			<u>be counted as separate breach even if they occur on the same period subject to penalty under Clause 7.2 of the WESM Rules and the relevant provisions of WESM Penalty Manual.</u>					
	4.6.2	[NEW]	<p><u>The Generation Company with must dispatch generating unit that is in operation for less than a year and is found in breach of MAPE or PERC95, shall be:</u></p> <p><u>a) imposed a penalty in proportion to the number of months in operation during the covered monitoring year. For instance, the plant commenced operation on 26 March, the financial penalty to be imposed shall be in proportion to the nine (9) billing months over</u></p>	<p>To consider situation where the duration of commercial operation is less than one year.</p> <p>For (a): duration of commercial operation within the year is 9 months and above. Proportionate penalty.</p> <p>For (b): duration is less 3 months or less. MDGUs which commenced operation in October, November, and December billing period – exempted. This is in</p>				

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			<p><u>the twelve (12) month-period.</u></p> <p><u>b) exempted from liability, if it commences operation within three (3) months prior to the end of the covered monitoring year.</u></p> <p><u>A must dispatch generating unit shall be considered in operation, for purposes of this Section, upon commencement of its operation or participation in the WESM either by virtue of the Final Certificate of Approval to Connect or the commercial operation registration in the WESM, whichever is applicable.</u></p>	<p>consideration of the adjustments during the initial period of operation.</p> <p>Reckoning of operation: Issuance of FCATC (if plant opts to operate already); or commercial operation registration, as the case may be.</p>				
SECTION 5 – AMENDMENT, PUBLICATION, AND EFFECTIVITY	5.3.2	[NEW]	<p><u>The amendments made herein and approved pursuant to the</u></p>	<p>The final FAS results are <u>cumulative</u> in nature and are determined on <u>annual basis</u>. It</p>				

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5.3 Effectivity			<u><b>Procedures for Changes to the WESM Rules, Retail Rules and Market Manuals shall have a retroactive effect from the beginning of the year that the said amendments are approved, unless the application thereof becomes inequitable and impracticable under the circumstances. For avoidance of doubt, the amended provisions that are</b></u>	<p>would be impractical to have different sets of the governing rule in different months in one year. Thus, to always ensure uniformity and practicality in the application of the rules/provisions, the same should be applied for the whole year.</p> <p>For instance, the amendment is approved in July 2023, it shall be applied from January to December 2023 billing period.</p> <p><i>“unless the application thereof becomes inequitable and impracticable under the circumstances” –to consider the prospective</i></p>				

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			<u>given retroactive effect shall be indicated in the PEM Board resolution and/or DOE issuance approving or promulgating them.</u>	application of the amendment in the event that it would become unjust or affect the vested rights of the generation company ( <i>e.g. stricter rule</i> ).				