



Control No: ORCP-WR-WM-22-14
Date Received by RCC: 04-Jan-2023

REQUEST FOR MARKET RULES AND MANUALS AMENDMENTS

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
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I. Proponent's Information

Name	Reynaldo B. Abadilla
Designation	OIC – Vice President and Head, System Operations
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II. Amendment Information

Proposed Amendments to the (please tick the box):

WESM Rules Retail Rules

Market Manual: *DISPATCH PROTOCOL ISSUE 17.0*

Topic: Enhancements and Updating of the System Operator's Re-Dispatching, Reporting and Market Intervention/Suspension Procedures

Proposed Classification of Amendments (please tick the box):

General Minor 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 Issue 17.0 aims to update and enhance the System Operator's procedures for re-dispatch implementation, submission of system advisories and significant incident reports, and the procedures during Market Intervention/Suspension.

IV. BACKGROUND

In the Dispatch Protocol Manual Issue 16.0, enhancements to the Market Operator and System Operator procedures were incorporated in view of the implementation of the enhanced WESM design and operations on 26 June 2021.

As part of the said enhancements, it was promulgated that in the process of issuing re-dispatch instructions that the System Operator shall make use of the first WMOT available for the hour as reference for its re-dispatch instruction at any dispatch interval for that hour. This enhancement was intended to address the System Operator's foreseen difficulties in the dispatch of power plants brought about by the frequent changes in the list of WMOT, in reference to the implementation of the enhanced WESM design and operations.

With the improvement of the System Operator's internal procedures, the issuance of re-dispatch instructions based on the 5-minute WMOT is now possible and the difficulties that were previously anticipated were already addressed. The System Operator is proposing to incorporate this enhancement in view of the following advantages:

1. Real-time approach and reflects the actual sequence of dispatch of power plants per 5-minutes;
2. Alignment with the methods set by the Market Operator; and
3. Utilization of the existing platform used by SCADA in displaying the WMOT in OPEN-3000.

WMOT is also proposed to be specified into national WMOT and regional WMOT. National WMOT will cover the interconnected grids where WESM is in operation, while regional WMOT is proposed to be further classified into:

1. Luzon-Visayas WMOT - WMOT for interconnected Luzon-Visayas Grid upon energization of MVIP and commercial operation of WESM Mindanao
2. Visayas-Mindanao WMOT - WMOT for interconnected Visayas-Mindanao Grid upon energization of MVIP and commercial operation of WESM Mindanao
3. Luzon WMOT - WMOT for Luzon Grid
4. Visayas WMOT - WMOT for Visayas Grid
5. Mindanao WMOT - WMOT for Mindanao Grid upon commercial operation of WESM Mindanao
6. Island WESM Merit Order Table (WMOT) - as necessary, WMOT for the isolated Grid where WESM is in operation.

Related to the re-dispatch implementation, the System Operator also proposes to incorporate the Generator's seeking of clearance from the System Operator prior to following dispatch schedules, when coming from complying to re-dispatch instructions. This is to avoid persistent issues which may still be present after the re-dispatch instructions.

For outage schedules, the System Operator proposes the amendment of the basis of updating of outage schedule due to deferred start-up, and the removal of the Grid Management Committee in the recipients of the Significant Incident Report and System Advisories.

As for the Market Intervention/Suspension procedures, the System Operator proposes the addition of the System Operator as recipient of the Market Surveillance Committee's assessment report during Market Intervention or Suspension, and

provision of an option to the System Operator the option to submit its comments on the Market Surveillance Committee’s assessment report during Market Intervention or Suspension.

V. THE PROPOSED RULES CHANGE

The proposal seeks to update and enhance the System Operator’s re-dispatch and reporting procedures as follows:

No.	Proposed Change	WESM Manual
1	Removal of the Grid Management Committee on the recipients of the System Operator’s System Advisories and Significant Incident Reports	WESM Rules Dispatch Protocol Manual Issue 17.0
2	System Operator’s use of the 5-minute WMOT as reference in issuing re-dispatch instructions	Dispatch Protocol Manual Issue 17.0
3	Addition of national WMOT which will cover the interconnected grids where WESM is in operation	Dispatch Protocol Manual Issue 17.0
4	Specification of the different classification of regional WMOTs	Dispatch Protocol Manual Issue 17.0
5	Generator’s seeking of Clearance from the System Operator prior to following dispatch schedules, when coming from compliance to re-dispatch instructions	Dispatch Protocol Manual Issue 17.0
6	Amendment of the basis of updating of outage schedule due to generating unit’s deferred start-up	Dispatch Protocol Manual Issue 17.0
7	Addition of the System Operator as recipient of the Market Surveillance Committee’s assessment report during Market Intervention or Suspension;	WESM Rules Dispatch Protocol Manual Issue 17.0
8	Addition of a new provision providing the System Operator of the option to submit its comments on the Market Surveillance Committee’s assessment report during Market Intervention or Suspension	Dispatch Protocol Manual Issue 17.0
9	Revision of the provision which will give trading participants with sufficient time to prepare for market-based instructions, upon ERC lifting of the Market Suspension	Dispatch Protocol Manual Issue 17.0

VI. BACKGROUND AND DESCRIPTION OF THE PROPONENT

The proponent is the National Grid Corporation of the Philippines as the System Operator.

VII. CONCLUSIONS AND RECOMMENDATIONS

The proposed amendments to the WESM Rules and WESM Manual on Dispatch Protocol Issue 17.0 will update and enhance the System Operator's procedure in issuing re-dispatch instructions, submission of system advisories and significant incident reports, and the procedures during Market Intervention/Suspension.

It is recommended that the proposed changes to be adopted.

VIII. REFERENCES

1. WESM Rules
2. WESM Manual on Dispatch Protocol Issue 17.0

IX. Proposed Amendments to the WESM Rules and WESM Manual on Dispatch Protocol regarding Enhancements and Updating of the System Operator’s Re-Dispatching, Reporting and Market Intervention/Suspension Procedures

A. WESM Rules

Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent’s Response	RCC Agreement
General Comments:								
CHAPTER 6 MARKET INTERVENTIO N AND SUSPENSION	6.2	<p>“6.2 OVERVIEW</p> <p>6.2.1 Preparation of Responses</p> <p>xxx</p> <p>6.2.1.5 WESM Participants acknowledge that:</p> <p>xxx</p> <p>(c) Subject to Clause 6.2.1.1, the <i>System Operator</i> shall issue <i>emergency instructions to all WESM Members</i> in accordance with the <i>WESM Rules</i> and the <i>Grid Code</i>, and shall prepare and submit a significant incident report, as soon as practicable, to the <i>ERC, PEM Board, DOE, Grid</i></p>	<p>Propose to revise as:</p> <p>“6.2 OVERVIEW</p> <p>6.2.1 Preparation of Responses</p> <p>xxx</p> <p>6.2.1.5 WESM Participants acknowledge that:</p> <p>xxx</p> <p>(c) Subject to Clause 6.2.1.1, the <i>System Operator</i> shall issue <i>emergency instructions to all WESM Members</i> in accordance with the <i>WESM Rules</i> and the <i>Grid Code</i>, and shall prepare and</p>	<p>Dissolution of the Grid Management Committee and Distribution Management Committee</p>				

Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		Management Committee and the <i>Market Operator</i> .”	submit a significant incident report, as soon as practicable, to the <i>ERC, PEM Board, DOE, Grid Management Committee</i> and the <i>Market Operator</i> .”					
	6.5	<p>“6.5 RESPONSE TO AN EMERGENCY</p> <p>6.5.1 Instructions During Emergency Condition</p> <p>xxx</p> <p>6.5.1.2 When an emergency condition arises, the <i>System Operator</i> shall immediately notify the <i>ERC, the DOE, Market Operator</i> and Grid Management Committee as soon as reasonably practicable, of the commencement and nature of the emergency. The <i>Market Operator</i>, on the other hand, shall notify <i>WESM Participants</i>, as soon as reasonably practicable, of the commencement</p>	<p>Propose to revise as:</p> <p>“6.5 RESPONSE TO AN EMERGENCY</p> <p>6.5.1 Instructions During Emergency Condition</p> <p>xxx</p> <p>6.5.1.2 When an emergency condition arises, the <i>System Operator</i> shall immediately notify the <i>ERC, the DOE, <u>and the Market Operator</u></i> and <i>Grid Management Committee</i> as soon as reasonably practicable, of the</p>	Dissolution of the Grid Management Committee and Distribution Management Committee				

Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		and nature of the <i>emergency</i> .”	commencement and nature of the emergency. The <i>Market Operator</i> , on the other hand, shall notify <i>WESM Participants</i> , as soon as reasonably practicable, of the commencement and nature of the <i>emergency</i> .”					
CLAUSE 6.9 MARKET SUSPENSION	6.9.4.2	A copy of the report prepared under Clause 6.9.4.1 shall be provided to: (a) the PEM Board; (b) the Market Operator; (c) the ERC and the DOE; and (c) WESM Participants and interested persons on request.	Propose to revise as: “A copy of the report prepared under Clause 6.9.4.1 shall be provided to: (a) the PEM Board; (b) the Market Operator; (c) <u>System Operator</u> ; (d) the ERC and the DOE; (e) WESM Participants and	To apprise the System Operator of the MSC's assessment result.				

Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			interested persons on request.”					

B. WESM Manual on Dispatch Protocol Issue 17.0

Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
General Comments:								
SECTION 2 DEFINITION, REFERENCES AND INTERPRETATION	2.1.2	NEW	<p>Propose to add new definitions as follows:</p> <p><u>“National WESM Merit Order Table (WMOT). WMOT for the interconnected grids where WESM is in operation. Prior to WESM Mindanao, National WMOT refers to interconnected Luzon and Visayas. Upon commencement of WESM Mindanao and upon energization of MVIP, National WMOT refers to interconnected Luzon-Visayas-Mindanao.</u></p>	<p>To clarify that the MO will prepare a National WMOT for the interconnected grids and a Regional WMOT for each of the grids where WESM is in commercial operation.</p> <p>The addition of the National WMOT will cover the interconnected grids, to serve as a guide of the SO (particularly the Central Grid Operations) in managing the</p>				

Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p><u>Regional WESM Merit Order Table (WMOT). WMOT for each of the grids where WESM is in operation and is further classified into:</u></p> <p>i. <u>Luzon-Visayas WMOT - WMOT for interconnected Luzon-Visayas Grid, when the Mindanao Grid in Market Intervention, upon energization of MVIP and commercial operation of WESM Mindanao</u></p> <p>ii. <u>Visayas-Mindanao WMOT - WMOT for interconnecte</u></p>	<p>capacity sharing between regions.</p> <p>Different Regional WMOT are also proposed to be specified.</p>				

Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p><u>d. Visayas-Mindanao Grid, when the Luzon Grid is in Market Intervention, upon energization of MVIP and commercial operation of WESM Mindanao</u></p> <p>iii. <u>Luzon WMOT - WMOT for Luzon Grid</u></p> <p>iv. <u>Visayas WMOT - WMOT for Visayas Grid</u></p> <p>v. <u>Mindanao WMOT - WMOT for Mindanao Grid upon commercial operation of WESM Mindanao</u></p> <p>vi. <u>Island WESM Merit Order Table (WMOT)</u></p>					

Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<p align="center">- _____ as <u>necessary,</u> <u>WMOT for the</u> <u>isolated grid</u> <u>where WESM</u> <u>is _____ in</u> <u>operation."</u></p>					
SECTION 7 SYSTEM OPERATOR INPUT DATA AND REPORTS	7.4	<p>“7.4 Data and Report Requirements xxx 7.4.2 The <i>System Operator</i> shall issue System Advisories to relevant agencies such as <i>DOE, ERC, Grid Management Committee (GMC)</i> and the <i>Market Operator</i> based on the following information: a. Alert Notices; b. Significant incidents; and c. Declaration of <i>market intervention</i></p>	<p>Propose to revise as: “7.4 Data and Report Requirements xxx 7.4.2 The <i>System Operator</i> shall issue System Advisories to relevant agencies such as <i>DOE, ERC, Grid Management Committee (GMC)</i> and the <i>Market Operator</i> based on the following information: a. Alert Notices; b. Significant incidents; and c. Declaration of <i>market intervention</i></p>	Dissolution of the Grid Management Committee and Distribution Management Committee				

Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		and <i>market suspension.</i> "	and <i>market suspension.</i> "					
SECTION 10 PREPARATION OF THE WESM MERIT ORDER TABLE	10.1	<p>"10.1 Background XXX</p> <p>10.1.4 The <i>Market Operator</i> prepares a separate <i>WMOT</i> for each of the <i>grids</i> where the <i>WESM</i> is in commercial operation."</p>	<p>Propose to revise as:</p> <p>"10.1 Background XXX</p> <p>10.1.4 The <i>Market Operator</i> prepares a <u>national WMOT, regional separate WMOTs for each of the grids, and an island WMOT (as necessary),</u> where the <i>WESM</i> is in commercial operation.</p> <p><u>10.1.5 The System Operator utilizes the national WMOT and the regional WMOT as a guide in the management of capacity sharing between grids, where WESM is in commercial operation.</u>"</p>	<p>To clarify that the MO will prepare a national WMOT for the interconnected grids and a regional WMOT for each of the grids where WESM is in commercial operation.</p> <p>The national WMOT will cover the interconnected grids, to serve as a guide of the SO (particularly the Central Grid Operations) in managing the capacity sharing between regions.</p>				

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SECTION 11 DISPATCH IMPLEMENTATION Background	11.1	<p>“11.1 Background xxx</p> <p>11.1.4 At any given dispatch interval, the System Operator shall issue re-dispatch instructions in accordance to the WMOT and shall make an out-of-merit dispatch when the system security is at risk.</p> <p>11.1.5 The System Operator shall make use of the first WMOT available for the hour as reference for its re-dispatch instruction at any dispatch interval for that hour (e.g. 1005H WMOT shall be used for all dispatch intervals from 1005H to 1100H).”</p>	<p>Propose to delete Section 11.1.5 as follows:</p> <p>“11.1 Background xxx</p> <p>11.1.4 At any given dispatch interval, the System Operator shall issue re-dispatch instructions in accordance to the WMOT and shall make an out-of-merit dispatch when the system security is at risk.</p> <p>11.1.5 The System Operator shall make use of the first WMOT available for the hour as reference for its re-dispatch instruction at any dispatch interval for that hour (e.g. 1005H WMOT shall be used for all dispatch</p>	<p>The use of the first WMOT as the SO's reference in issuing re-dispatch instructions was due to the foreseen difficulty in the dispatch of power plants brought about by the frequent changes in the list of WMOT.</p> <p>With the improvement of the System Operator's internal procedures, the issuance of re-dispatch instructions based on the 5-minute WMOT is now possible and the difficulties that were previously anticipated were</p>				

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			intervals from 1005H to 1400H).”	<p>already addressed. The System Operator is proposing to incorporate this enhancement in view of the following advantages:</p> <ol style="list-style-type: none"> 1. Real-time approach and reflects the actual sequence of dispatch of power plants per 5-minutes; 2. Alignment with the methods set by the Market Operator; and 3. Utilization of the existing platform used by SCADA in displaying 				

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				the WMOT in OPEN-3000.				
SECTION 11 DISPATCH IMPLEMENTATION	11.7	<p>“11.7 Re-dispatch Procedures xxx</p> <p>11.7.5 After complying with the re-dispatch instructions, <i>generators</i> shall immediately follow the <i>dispatch schedules</i> for the next <i>dispatch interval</i>.”</p>	<p>Propose to revise as: “11.7 Re-dispatch Procedures xxx</p> <p>11.7.5 After complying with the re-dispatch instructions, <i>generators</i> shall immediately <u>seek clearance from System Operator to</u> follow the <i>dispatch schedules</i> for the next <i>dispatch interval</i>.”</p>	For example, during MOT constrain-off instruction due to over frequency, it is highly possible that over frequency still persists for the following dispatch interval. Hence, generators must seek clearance from SO first before following their dispatch schedules.				
SECTION 13 START-UP AND SHUTDOWN OF GENERATING UNITS	13.4	<p>“13.4 Start-up of a Generating Unit xxx</p> <p>13.4.3 If the start-up will be deferred, the <i>System Operator</i> shall update the outage schedule accordingly and in</p>	<p>Propose to revise as: “13.4 Start-up of a Generating Unit xxx</p> <p>13.4.3 If the start-up will be deferred, <u>the generators shall submit its new outage schedule to the</u></p>	If a generating unit fails to start-up after its planned outage schedule has lapsed, its outage schedule must not be modified since this extension would				

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		accordance with the <i>WESM timetable</i> for submission of outage schedules.”	System Operator. The System Operator shall then update the outage schedule accordingly, and in accordance with the <i>WESM timetable</i> for submission of outage schedules.”	now fall under forced outage. If the extension is necessary for inclusion in SOMODIP, schedule must undergo proper coordination protocol and approved for unplanned outage (non-GOP). Generators should submit its new outage schedule to the System Operator for proper tagging and updating.				
SECTION 16 PROCEDURES DURING MARKET INTERVENTION AND SUSPENSION	16.3.3	The Market Surveillance Committee will perform an assessment and submit a report to the PEM Board, the DOE and the ERC	Propose to revise as: “The Market Surveillance Committee will perform an assessment and submit a report to the PEM Board, the DOE, and the ERC, and the	To apprise the System Operator of the MSC's assessment result.				

Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<p>containing the following:</p> <p>a. Adequacy of the provisions of the WESM Rules relevant to the event/s which occurred;</p> <p>b. Appropriateness of actions taken by the System Operator in relation to the event/s that occurred; and</p> <p>c. Costs incurred by the WESM Members as a result to responding to the event/s.</p>	<p>System Operator containing the following:</p> <p>a. Adequacy of the provisions of the WESM Rules relevant to the event/s which occurred;</p> <p>b. Appropriateness of actions taken by the System Operator and/or Market Operator in relation to the event/s that occurred; and</p> <p>c. Costs incurred by the WESM Members as a result to responding to the event/s.</p>	<p>For consistency with WESM Rules Section 6.9.4.1:</p> <p><i>“The PEM Board shall, within ten days thereof, direct the Market Surveillance Committee to investigate the circumstances of that event and prepare a report to assess:</i></p> <p><i>(a) The adequacy of the provisions of the WESM Rules relevant to the event, and its proposed amendments, if any;</i></p> <p><i>(b) The appropriateness of actions taken</i></p>				

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				<p><i>by the System Operator and/or the Market Operator in relation to the event;</i></p> <p><i>(c) The impact and possible costs incurred by WESM Members as a consequence of the event; and</i></p> <p><i>(d) Any finding of potential fault of any WESM Participant including a preliminary recommendation for further evaluation by the PEM Audit Committee.”</i></p>				
SECTION 16 PROCEDURES DURING MARKET INTERVENTION	NEW		Propose to add a new provision to read as:	To provide the System Operator with the option/opportunit				

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AND SUSPENSION			<u>"16.3.4 The System Operator may opt to submit its comments on the assessment report indicating its counter-arguments, if any."</u>	y to correct or comment on the report.				
SECTION 16 PROCEDURES DURING MARKET INTERVENTION AND SUSPENSION	16.8.1	Market Resumption after a Market Suspension. When the ERC lifts the suspension of the market, the operations of the market will resume at the soonest possible time following receipt by the Market Operator from the ERC of the notice lifting the market suspension. If the cause of the market suspension is the occurrence of a natural calamity, the Market Operator or the System Operator may recommend to the	Propose to revise as: "Market Resumption after a Market Suspension. When the ERC lifts the suspension of the market, the operations of the market will resume at the soonest possible time following receipt by the Market Operator from the ERC of the notice lifting the market suspension. If the cause of the market suspension is the occurrence of a natural calamity, the Market Operator or the System Operator may recommend to the ERC	To provide the participants with sufficient time to prepare for market-based instructions.	What if both the System Operator and Market Operator submit recommendations which would contradict one from another? Which will prevail? We suggest to reword the proposed amendment in this manner to ensure that the inputs of System Operator is considered prior to submission of			

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		ERC the lifting of the market suspension if the effects of the calamity on the market or the grid has already been resolved.	the lifting of the market suspension if the effects of the calamity on the market or the grid has already been resolved. <u>When the ERC lifts the suspension of the market, the operations of the market will resume at the specific dispatch interval prescribed by the ERC, which may come from the recommendation of the Market Operator or the System Operator considering the preparations necessitated by the participants in complying with market-based instructions.</u>		<p>recommendation to the ERC:</p> <p>xxx</p> <p>When the ERC lifts the suspension of the market, the operations of the market will resume at the specific dispatch interval prescribed by the ERC, which may come from the recommendation of the Market Operator or the in coordination with the System Operator considering the preparations necessitated by the participants in complying with market-</p>			

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					based instructions.”			
SECTION 20 EMERGENCY PROCEDURES	20.3	<p>“20.3 Responsibilities</p> <p>20.3.1 The <i>System Operator</i> shall:</p> <p>a. Give <i>emergency</i> instructions or directives when it determines the existence of a situation which has an adverse material effect on electricity supply or which poses as a significant threat to <i>system security</i>.</p> <p>b. Prepare and submit a significant incident report to the <i>ERC, PEM Board, DOE, Grid Management Committee</i> and the <i>Market Operator</i>.</p> <p>c. May from time to time specify</p>	<p>Propose to revise as:</p> <p>“20.3 Responsibilities</p> <p>20.3.1 The <i>System Operator</i> shall:</p> <p>a. Give <i>emergency</i> instructions or directives when it determines the existence of a situation which has an adverse material effect on electricity supply or which poses as a significant threat to <i>system security</i>.</p> <p>b. Prepare and submit a significant incident report to the <i>ERC, PEM Board, DOE, Grid Management Committee</i> and the <i>Market Operator</i>.</p> <p>c. May from time to time specify</p>	Dissolution of the Grid Management Committee and Distribution Management Committee				

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		<p>procedures for communicating the existence of an emergency and all relevant information relating to the <i>emergency</i> to the <i>WESM Participants</i>.</p> <p>d. Review and update the <i>emergency</i> procedures in consultation with the <i>Market Operator</i> as the need arises."</p>	<p>procedures for communicating the existence of an emergency and all relevant information relating to the <i>emergency</i> to the <i>WESM Participants</i>.</p> <p>d. Review and update the <i>emergency</i> procedures in consultation with the <i>Market Operator</i> as the need arises."</p>					

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