



## **Call for Comments to the Proposed General Amendments to the WESM Rules and Various WESM Manuals on the Interruptible Load Program Implementation**

The Rules Change Committee (RCC) is inviting all WESM Members and interested parties to submit comments to the *Proposed General Amendments to the WESM Rules and Various WESM Manuals on the Interruptible Load Program Implementation*.

The proposed amendments seek to harmonize the WESM Rules and relevant Manuals with the DOE policies and ERC regulations related to ILP and to recommend improvements to existing market processes to aid in smooth implementation of ILP.

The WESM documents for amendments are:

- 1) WESM Rules;
- 2) WESM Manual on Dispatch Protocol;
- 3) WESM Manual on Load Forecasting Methodology; and
- 4) WESM Manual on Billing and Settlement.

### **BACKGROUND:**

The proposed amendments were submitted by the Independent Electricity Market Operator of the Philippines (IEMOP) on 17 February 2023 by way of the rules change process for urgent amendments. However, after deliberating the urgent proposals in two (2) meetings, the RCC, during its 212<sup>th</sup> Regular Meeting, certified the proposal as not urgent and reclassified the same to be a general proposal. Correspondingly, on 29 March 2023, the PEM Board during its 58th Meeting concurred with the RCC's decision on the said proposal.

### **DOCUMENTS:**

Provided below are the relevant materials for your reference:

- 1) Original Rules Change Proposal submitted by IEMOP (ORCP-WR-WM-23-02)
- 2) PEM Board-approved proposal (RCC Resolution No. 2023-03) per PEM Board Approval on 29 March 2023
- 3) Matrix of Proposed Amendments for Comments - Annexes A to D of this document (*See below. Please write your comments in the proper columns in the matrix.*)

Kindly submit your comments (in Word format) through the [File a Submission](#) page no later than **18 May 2023** or 30 working days from the date of publication (31 March 2023). *Please input in the proper field the e-mail address of your point person(s) who we could further contact regarding activities related to the processing of the proposal.*

Thank you.

For the Rules Change Committee,

**Rules Review Division**

Market Assessment Group

**Philippine Electricity Market Corporation**

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

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

WESM Rules								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
<i>Please write your general comment here, if any:</i>								
Submission of Offers, Bid and Data – Load Forecasting	3.5.8	(new)	<b><u>3.5.8 Network Service Providers shall inform the Market Operator of the total MW demand per hour that is committed for the implementation of the Interruptible Load Program for the next day.</u></b>	To enable MO to consider ILP de-loading capacity in forecasted demand during real-time scheduling	NGCP would like to inquire if the proposal is consistent with the Section 3 of ERC Resolution No. 8, Series of 2010, which states that the DU will inquire with the Participating Customer (PC) the amount of load they can drop 45 minutes before the activation of ILP.			
GLOSSARY	11	(new)	<b><u>Interruptible Load Program. The program where an End-user, in accordance with its protocol with its Network Service Providers, voluntarily agrees to either fully de-load, by disconnecting its delivery point that receives electricity, or partially de-load by reducing its load in response to an alert or notice issued by the System Operator of an expected power shortage.</u></b>	To define Interruptible Load Program based on provisions of relevant rules and issuances on ILP				

WESM Manual on Dispatch Protocol Issue 18.0								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
<i>Please write your general comment here, if any:</i>								
WESM Timetable – Week-Ahead Projection	4.3.2	WAP Timeline		WAP Timeline		To establish that Market Participants should provide inputs based on reasonable estimates of their expected capability for the upcoming week.		
		Time	Activity	Responsible Party	Time			
		Before 0845H	Submit the most recent self-scheduled nominations, bids and offers for all relevant hours of the WAP run	Trading Participants	Before 0845H	Submit the most recent self-scheduled nominations, bids and offers for all relevant hours of the WAP run <b>consistent with the provisions of Clauses 6.1.7 and 6.13 of this Manual.</b>	Trading Participants	

WESM Manual on Dispatch Protocol Issue 18.0												
Title	Clause	Original Provision			Proposed Amendment (as amended by RCC)			Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
WESM Timetable – Day-Ahead Projection	4.4.2	DAP Timeline			DAP Timeline			To establish that Market Participants should provide inputs based on reasonable estimates of their expected capability for the upcoming week.				
		Time	Activity	Responsible Party	Time	Activity	Responsible Party					
		Before the most recent self-scheduled nominations, bids and offers for all relevant hours of the DAP run	Submit the most recent self-scheduled nominations, bids and offers for all relevant hours of the DAP run <b>consistent with the provisions of Clauses 6.1.7 and 6.13 of this Manual.</b>	Trading Participants	Trading Participants							

WESM Manual on Dispatch Protocol Issue 18.0								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
Real-Time Dispatch Scheduling - Responsibilities	9.3.4	(new)	<b><u>9.3.4 Network Service Providers shall be responsible for providing information on the committed MW demand for the implementation of the Interruptible Load Program in accordance with the WESM Manual on Load Forecasting Methodology</u></b>	To enable MO to consider ILP de-loading capacity in forecasted demand during real-time scheduling				

WESM Manual on Load Forecasting Methodology Issue 4.0								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
Please write your general comment here, if any:								
Responsibilities	3.4	(new)	<b><u>3.4 Network Service Providers shall be responsible for submitting the Market Operator of the total MW demand per hour that is committed for the implementation of the Interruptible Load Program in accordance with Section 7.3 of this Manual and ensure such information's accuracy.</u></b>	To enable MO to consider ILP de-loading capacity in forecasted demand during real-time scheduling				
Customer Forecasts	7.3	(new)	<b><u>7.3 INFORMATION ON INTERRUPTIBLE LOAD PROGRAM IMPLEMENTATION</u></b>  <b><u>7.3.1 By 2000H, Network Service Providers shall submit the Market Operator of the total MW demand per hour that is committed for the implementation of the Interruptible Load Program for the next day.</u></b>	To enable MO to consider ILP de-loading capacity in forecasted demand during real-time scheduling	NGCP would like to inquire if the proposal is consistent with the Section 3 of ERC Resolution No. 8, Series of 2010, which states that the DU will inquire with the Participating Customer (PC) the amount of load they can drop 45 minutes before the activation of ILP.			

WESM Manual on Billing and Settlement Issue 12.1								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
Please write your general comment/s here, if any:								
Bilateral Contract Declaration	9.5	(new)	<p><b><u>REDECLARATIONS FOR ENERGY TRANSACTIONS</u></b></p> <p><b><u>9.5.1 Generation Companies may re-declare bilateral contract quantities in respect to:</u></b></p> <ul style="list-style-type: none"> <li>a) <b><u>Contestable Customers that are registered with the Distribution Utility as Interruptible Load Program participants;</u></b></li> <li>b) <b><u>Directly connected customers that are registered with NGCP as Interruptible Load Program participants;</u></b></li> <li>c) <b><u>Force majeure events resulting to inability to access the Market Operator's electronic submission platform</u></b></li> </ul>	<p>To institutionalize the Interim Protocol, which is currently not officially part of the WESM Manuals</p> <p>Section 9.5.1.a and 9.5.1.b are adopted from the Interim Protocol. Section 9.5.1.c is added to accommodate cases of Trading Participants requesting for re-declaration during force majeure events resulting to inability to access the Central Registration and Settlement System</p>				
		(new)	<p><b><u>9.5.2 In relation to Section 9.5.1.a and 9.5.1.b of this Manual, the System Operator and Distribution Utilities shall provide the Market Operator the list of their respective customers participating in the</u></b></p>	<p>Section 9.5.2 is adopted from the Interim Protocol.</p>				

WESM Manual on Billing and Settlement Issue 12.1								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
			<u>Interruptible Load Program every 15<sup>th</sup> day of the month.</u>					
		(new)	<u>9.5.3 If re-declaration is due to Section 9.5.1.a of this Manual, the Generation Companies shall enroll the applicable Distribution Utility as a supply customer with the Market Operator prior to re-declaration in accordance with Section 3.5 of the WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures.</u>	Section 9.5.3 is adopted from the Interim Protocol.				
		(new)	<u>9.5.4 The System Operator and Distribution Utilities shall inform the Market Operator of the actual time and duration of de-loading of their customers participating in the Interruptible Load Program no later than one (1) business day from the end of the relevant trading day the Interruptible Load Program was activated.</u>	Section 9.5.4 is adopted from the Interim Protocol.				
		(new)	<u>9.5.5 If re-declaration is due to Section 9.5.1.a of this Manual,</u>	Section 9.5.5 is adopted from the Interim Protocol.				

WESM Manual on Billing and Settlement Issue 12.1								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
			<u>the Generation Companies shall submit the re-declaration of bilateral contract quantities for the applicable Contestable Customers for the account of the corresponding Distribution Utilities no later than seven (7) business days from the end of the relevant trading day when the Interruptible Load Program was activated.</u>					
		(new)	<u>9.5.6 If re-declaration is due to Section 9.5.1.b of this Manual, the Generation Companies shall submit the re-declaration of bilateral contract quantities for the applicable directly connected customers no later than seven (7) business days from the end of the relevant trading day when the Interruptible Load Program was activated.</u>	Section 9.5.6 is adopted from the Interim Protocol.				
		(new)	<u>9.5.7 If re-declaration is due to Section 9.5.1.c of this Manual, the Generation Companies shall submit the re-declaration of bilateral contract quantities for the affected dispatch intervals, with accompanying</u>	Section 9.5.7 is proposed to accommodate cases of Trading Participants requesting for re-declaration during force majeure events resulting to inability to access the				

WESM Manual on Billing and Settlement Issue 12.1								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
			<u>proof of inability to access the Market Operator's electronic submission platform, no later than seven (7) business days from the end of the relevant trading day when the force majeure event occurred, provided that the Generation Company shall immediately report the inability to access the Market Operator's electronic submission platform within the day of occurrence of the force majeure event.</u>	Central Registration and Settlement System				
		(new)	<u>9.5.8 The Market Operator is authorized to approve a request for re-declaration of bilateral contract quantities made under Section 9.5.5 and 9.5.6 of this Manual provided that such re-declaration complies with all the following requirements:</u>  <u>a) The bilateral contract quantity re-declarations were submitted no later than seven (7) business days from the end of the relevant trading day when the Interruptible</u>	Section 9.5.8 is adopted from the Interim Protocol.				

WESM Manual on Billing and Settlement Issue 12.1								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
			<p><u>Load Program was activated;</u></p> <p>b) <u>The bilateral contract quantity re-declarations were only for intervals when the Interruptible Load Program was activated;</u></p> <p>c) <u>The bilateral contract quantity re-declarations of Generation Companies correspond with their respective contract enrolments; and</u></p> <p>d) <u>The bilateral contract re-declarations of Generation Companies follow the prescribed format and mode of submissions.</u></p>					
		(new)	<p><u>9.5.9 The Market Operator is authorized to approve a request for re-declaration of bilateral contract quantities made under Section 9.5.7 of this Manual provided that such re-declaration complies with all the following requirements:</u></p> <p>a) <u>The bilateral contract quantity re-declarations were submitted no later than</u></p>	Section 9.5.9 is proposed to provide guidance to the Market Operator and Generation Companies on criteria for evaluation of submitted re-declarations.				

WESM Manual on Billing and Settlement Issue 12.1								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
			<p><u>seven (7) business days from the end of the relevant trading day when the force majeure event occurred;</u></p> <p>b) <u>The bilateral contract quantity re-declarations were only for intervals when the Market Operator's electronic submission platform was inaccessible;</u></p> <p>c) <u>The bilateral contract quantity re-declarations of Generation Companies correspond with their respective contract enrolments;</u></p> <p>d) <u>The bilateral contract re-declarations of Generation Companies follow the prescribed format and mode of submissions;</u></p> <p>e) <u>The Generation Company immediately reported the inability to access the Market Operator's electronic</u></p>					

WESM Manual on Billing and Settlement Issue 12.1								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
			<u>submission platform within the day of occurrence of the force majeure event; and</u> f) <u>The Generation Company attests, by way of a public document, to the truthfulness and correctness of the submitted proof of inability to access the Market Operator's electronic submission platform.</u>					
		(new)	<b><u>9.5.10 The Market Operator shall act upon requests for re-declaration within a period of five (5) working days from receipt thereof.</u></b>	To provide timeline for approval/disapproval of request for redeclarations	<u>Is there a proposed timeline/procedure for addressing discrepancies?</u>			
		(new)	<b><u>9.5.11 Disputes in respect of the Market Operator's disapproval of a request for redeclaration may be raised within six (6) months from the WESM Member's receipt of the Market Operator's decision. It shall be resolved pursuant to the</u></b>	To provide recourse for participants in case of disputes in line with existing dispute resolution process				

WESM Manual on Billing and Settlement Issue 12.1								
Title	Clause	Original Provision	Proposed Amendment (as amended by RCC)	Rationale	Comment	Proposed Re-wording based on Comment	Original Proponent's Response	RCC Decision
			<u>dispute resolution procedure set out in the WESM Rules Clause 7.3.</u>					
		(new)	<u>9.5.12 Re-declarations approved after the 28<sup>th</sup> day of the calendar month shall not be included in the computation of the preliminary settlement statement and instead shall be included in the final settlement statements for that billing month.</u>	To be consistent with new clauses 9.5.10 and 9.5.11 above, we propose that cut-off for inclusion of redeclarations in the preliminary statements shall be reckoned from approval date. In addition, we propose to move cut-off to 28 <sup>th</sup> of the calendar month. This is because IEMOP's run for preliminary billing starts on the 29th.				
		(new)	<u>9.5.13 The Market Operator shall issue advisories on the mode of submissions of the re-declaration and publish the same in its website.</u>	To institutionalize the Interim Protocol, which is currently not officially part of the WESM Manuals				