



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 212th 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

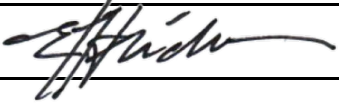
Market Assessment Group

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

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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>								
<i>A. For the RCC's information, IEMOP provided the following information on 17 March 2023 relative to this proposal's corresponding Urgent Amendment. May we request IEMOP for updated information, if available.</i>								
<i>a. Summary information and/or statistics on ILP registration and bilateral contract quantities</i>			218 Registered ILP Customers as of 15 September 2022; No BCQ declarations on ILP for the 5-minute market					
<i>b. Information on the issues encountered with the implementation of the Interim Protocol</i>			1. SO reported inaccuracy of DAP submissions which resulted in inaccurate determination of alert conditions. 2. No existing provision for NSPs to provide MO with information on ILP capacity prior to implementation					
<i>c. Summary information and/or statistics on instances when the CRSS cannot be accessed by Market Participants because of force majeure events</i>			Instances of CRSS Downtimes from MOPS Monitoring: 1. CRSS Application Issue - 5.77 hours 2. CRSS Users cannot login and authenticate Active Directory – 0.95 hours 3. CRSS not accessible due to SSL Certificate Expiration – 1.73 hours CRSS not accessible due to Firewall cable network issue – 0.25 hours					
<i>B. In reference to ERC Resolution No. 5, Series of 2015 (Annex B – Meter Reading, Computation of Payment for Re-declared BCQ and De-loading Compensation, and Payment to RES and Participating Contestable Customer), suggest including a general provision on BCQ redeclaration for ILP quantities in the WESM Rules. Could be a new provision under Section 3.13.1 (Submission of Bilateral Contract Data for Energy)</i>								
<i>C. Request sample computation in case of BCQ redeclaration using dummy values.</i>								

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
Submission of Offers, Bid and Data – Load Forecasting	3.5.8	(new)	<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>	To enable MO to consider ILP de-loading capacity in forecasted demand during real-time scheduling	What are the necessary information and process for NSPs to be able to comply with this provision? Note: related to proposed DPM Clause 9.3.4 and LFM Clause 3.4			
GLOSSARY	11	(new)	<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>	To define Interruptible Load Program based on provisions of relevant rules and issuances on ILP	Suggest inserting ERC issuances related to ILP as references.	<u>Interruptible Load Program. The program set out in relevant ERC issuances 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</u>		

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
						<u>expected power shortage.</u>		

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
Please write your general comment here, if any:										
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	Activity	Responsible Party			
		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 <u>consistent with the provisions of Clauses 6.1.7 and 6.13 of this Manual.</u>	Trading Participants			

WESM Manual on Dispatch Protocol Issue 18.0												
Title	Claus e	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.				
		Ti me	Activi ty	Respon sible Party	Time	Activity	Respo nsible Party					
		Bef ore [ST PH 1* - 10 min ute s]	Sub mit the most recen t self- sche duled nomi natio ns, bids and offers for all relev ant hours of the DAP run	Trading Particip ants	Befo re [STP H1* - 10 minu tes]	Submit the most recent self- scheduled nominations , bids and offers for all relevant hours of the DAP run <u>consistent with the provisions of Clauses 6.1.7 and 6.13 of this Manual.</u>	Tradin g Partici pants					

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)	<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>	To enable MO to consider ILP de-loading capacity in forecasted demand during real-time scheduling	Same comment in proposed WESM Rules Clause 3.5.8			

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)	<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>	To enable MO to consider ILP de-loading capacity in forecasted demand during real-time scheduling	Same comment in proposed WESM Rules Clause 3.5.8			
Customer Forecasts	7.3	(new)	<u>7.3 INFORMATION ON INTERRUPTIBLE LOAD PROGRAM IMPLEMENTATION</u> <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>	To enable MO to consider ILP de-loading capacity in forecasted demand during real-time scheduling	Should the SO be also provided with this information? Note that notification of Demand Control for the next day is also required to be provided to the SO by a User before 0900H of the current day under the PGC (GO 6.6.11.1).			

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><u>REDECLARATIONS FOR ENERGY TRANSACTIONS</u></p> <p><u>9.5.1 Generation Companies may re-declare bilateral contract quantities in respect to:</u></p> <p>a) <u>Contestable Customers that are registered with the Distribution Utility as Interruptible Load Program participants;</u></p> <p>b) <u>Directly connected customers that are registered with NGCP as Interruptible Load Program participants;</u></p> <p>c) <u>Force majeure events resulting to inability to access the Market Operator's electronic submission platform</u></p>	<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>	<p>For item b): Suggest revising NGCP to Transmission Network Service Provider</p> <p>For item c):</p> <p>1. For RCC's reference, may we request:</p> <ul style="list-style-type: none">• A listing of TPs who requested redeclaration• The approval process for such requests• Confirmation whether information on the redeclaration was provided to the PEM Board, Market Participants, or DOE/ERC• Other alternative methods available to Trading Participants if they cannot access the CRSS	<p><u>REDECLARATIONS FOR ENERGY TRANSACTIONS</u></p> <p><u>9.5.1 Generation Companies may re-declare bilateral contract quantities in respect to:</u></p> <p>a) <u>Contestable Customers that are registered with the Distribution Utility as Interruptible Load Program participants;</u></p> <p>b) <u>Directly connected customers that are registered with the NGCP Transmission Network Service Provider as Interruptible Load Program participants;</u></p> <p>c) <u>Force majeure events resulting</u></p>		

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					2. Kindly note DOE's letter to PEM Board dated 03 August 2021 which indicates the re-declaration. The letter emphasized that submission and/or confirmation of BCQ is a critical responsibility of TP. However, the DOE letter also states that an exemption may be allowed on a case-to-case basis, particularly when the failure to do so is due to CRSS unavailability.	<u>in inability to access the Market Operator's electronic submission platform</u>		
		(new)	<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 Interruptible Load Program every 15th day of the month.</u>	Section 9.5.2 is adopted from the Interim Protocol.				
		(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</u>	Section 9.5.3 is adopted from the Interim Protocol.				

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			<u>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>					
		(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, 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</u>	Section 9.5.5 is adopted from the Interim Protocol.				

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			<u>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 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</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 Central Registration and Settlement System	Reconsider timeline for processing of re-declaration during force majeure in consideration of CRSS availability and additional information from past TP requests for BCQ re-declaration			

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			<u>report the inability to access the Market Operator's electronic submission platform within the day of occurrence of the force majeure event.</u>					
		(new)	<p><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></p> <p><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 Load Program was activated;</u></p> <p><u>b) The bilateral contract quantity re-declarations were only for intervals when the Interruptible Load Program was activated;</u></p> <p><u>c) The bilateral contract quantity re-declarations</u></p>	Section 9.5.8 is adopted from the Interim Protocol.	<p>For item d):</p> <ol style="list-style-type: none">1. What are the modes for redeclarations?2. If through CRSS, is this already existing or may require enhancement to the system?3. If this requires improvement, how much will be the additional cost that will be incurred? <p>Requesting for possible financial impact in Php/MW if the enhancement will incur additional cost.</p>			

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			<u>of Generation Companies correspond with their respective contract enrolments; and</u> d) <u>The bilateral contract re-declarations of Generation Companies follow the prescribed format and mode of submissions.</u>					
		(new)	<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> a) <u>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 force majeure event occurred;</u> b) <u>The bilateral contract quantity re-declarations were only</u>	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								
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			<p><u>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 submission platform within the day of occurrence of the <i>force majeure</i> event; and</u></p> <p>f) <u>The Generation Company attests, by way of a public document, to the truthfulness and</u></p>					

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			<u>correctness of the submitted proof of inability to access the Market Operator's electronic submission platform.</u>					
		(new)	<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>	To provide timeline for approval/disapproval of request for redeclarations		<u>9.5.10 The Market Operator shall act upon requests for re-declaration and shall inform the WESM Member of its decision and reason for approval or disapproval within a period of five (5) working days from receipt thereof.</u> <u>The requests for re-declaration shall be published in the Market Information Website to provide information to the Market Participants.</u> <u>A monthly summary of re-declaration requests, including the reasons and decisions, shall be</u>		

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						<u>provided by the Market Operator to the PEM Board for information.</u>		
		(new)	<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 dispute resolution procedure set out in the WESM Rules Clause 7.3.</u>	To provide recourse for participants in case of disputes in line with existing dispute resolution process				
		(new)	<u>9.5.12 Re-declarations approved after the 28th 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 th of the calendar month. This is because IEMOP's run for preliminary billing starts on the 29th.				

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		(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	Suggest revising the “website” to “Market Information Website” as defined in WESM Rules	<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 the Market Information Website.</u>		