
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 should be submitted to:

Rules Change Committee

Attention: WESM Governance Committee Secretariat
Philippine Electricity Market Corporation
18/F Robinsons Equitable Tower
ADB Avenue, Ortigas Center
Pasig City, 1605 Philippines
Email address: mag_rrd@wesm.ph

[In accomplishing and submitting this form, you give your consent for PEMC to collect, record, organize, and update your personal data as herein provided as part of your information for purposes of rules change process.]

I. Proponent's Information

Name	Reynaldo B. Abadilla
Designation	
Company	National Grid Corporation of the Philippines
Company Address	
Telephone No.	
Email Address	

II. Amendment Information

Proposed Amendments to the (please tick the box):

WESM Rules Retail Rules

Market Manual: WESM Manual on Dispatch Protocol Issue 22.1

Topic: Validation Process of Reported Discrepancies in the Dispatch
Instruction Report

Proposed Classification of Amendments (please tick the box):

General Minor Urgent

If Urgent, reason for urgency:

III. SUMMARY OF THE PROPOSED RULES CHANGE

The amendments to the WESM Rules and Manuals on Dispatch Protocol are proposed to enhance the validation process of reported discrepancies in the Dispatch Instruction Report and amend the prescribed timeline to provide the System Operator, Market Operator and Generator Companies a sufficient period to assess and validate reported discrepancies thoroughly.

IV. BACKGROUND

Section 14 of the WESM Manual on Dispatch Protocol provides for the validation process of reported discrepancies in the Dispatch Instruction Report. Under this section, the Market Operator is mandated to publish the Dispatch Instruction Report in the market information website no later than one (1) week from the relevant trading day. Each Generation Company shall then validate all the data in the Dispatch Instruction Report as published by the Market Operator and any discrepancy in these reports shall be reported by the Generation Company to the Market Operator within two (2) weeks after publication. Failure by the Generation Company to report to the Market Operator any discrepancy within the period defined shall render the data in the report as final.

Within two (2) working days from receipt of a report, the Market Operator shall request the System Operator to validate a reported discrepancy by a generator.

In order to prepare and submit the validation in a timely manner, the WESM Manual on Dispatch Protocol Issue 21.0 requires the System Operator to perform reconciliation with the Generation Company and provide the results of its validation of the reported discrepancies within seven (7) working days from the receipt of the request from the MO. If the Market Operator has not received any validation within the prescribed timeline, the published data from the DIR shall be maintained. If the Generation Company claims additional compensation related to the reported discrepancies that were not validated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.

During actual operations, the System Operator is able to comply with the prescribed validation timeline. However, there were instances where Generator requested for further validation of the validated discrepancy claims submitted by the System Operator to the Market Operator. Section 14 of the WESM Manual does not provide for the revalidation process.

V. THE PROPOSED RULES CHANGE

To address the concerns raised above, the following changes are proposed to the validation process of Post Dispatch Reports provided under the WESM Manual on Dispatch Protocol Issue 21.0:

No.	Concern	Proposed Change
1	WESM Manual on Dispatch Protocol does not provide for the revalidation process of	Include a provision for the revalidation of discrepancy claims and provide the System Operator

	discrepancy claims submitted by the System Operator to the Market Operator	an additional (7) working days for such process.
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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 amendments to the WESM Manual on Dispatch Protocol shall enhance the process of Dispatch Instruction Report discrepancy validation by including a provision for revalidation of discrepancy claims, providing the System Operator, Market Operator and Generator Companies sufficient period to verify the data published in the Dispatch Instruction Report.

It is recommended that the proposed changes be adopted.

VIII. REFERENCES

1. *WESM Manual on Dispatch Protocol Issue 21.*



Philippine Electricity
Market Corporation

TO BE ACCOMPLISHED BY THE PARTY SUBMITTING THE COMMENTS

[In accomplishing and submitting this form, you give your consent for PEMC to collect, record, organize, and update your personal data as herein provided as part of your information for purposes of rules change process.]

Commenter's Information

Name	Richard J. Nethercott <i>[Signature over Name]</i>
Designation	
Company	Independent Electricity Market Operator of the Philippines Inc.
Company Address	
Telephone No.	
Email Address	

Proposed Amendments to the WESM Manual on Dispatch Protocol Issue 22.1

Commenter	General Comments	Proponent's Response
	<p><i>[If to be adopted, the proposed revalidation process should be limited to a specific set of grounds. In this regard, it must be noted that (i) the proposed revalidation is simply a duplication of the present validation process; and (ii) the current provisions on the validation of dispatch instruction report already requires the System Operator and the concerned Generation Company to perform reconciliation. Any discrepancy, therefore, should have already been threshed out by the System Operator and the Generation Company during the initial validation process. Thus, if adopted, the availment of the revalidation process should be limited to exceptionally meritorious cases.]</i></p>	

WESM Manual on Dispatch Protocol Issue 22.1								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Decision
Post-dispatch Reports and Information	WESM DP 14.4.9	14.4.9 The System Operator shall perform reconciliation with the Generation Company and provide the results of its validation of the reported discrepancies within seven (7) working days from the receipt of the request from the Market Operator. If the Market Operator has not received any validation within the prescribed timeline, the published data from the Dispatch	14.4.9 The System Operator shall perform reconciliation with the Generation Company and provide the results of its validation of the reported discrepancies within seven (7) working days from the receipt of the request from the Market Operator. <u>If the Trading Participants find any further discrepancies in the submitted report, the</u>	Rationale of the Proposal To include a provision for the revalidation process of data contained in the Dispatch Instruction Report should the Generator Companies submit a request for further validation of the System Operator's	(1) In relation to the requirement that the Market Operator shall review the revalidation request (i.e., if the request is impressed with merit), the Market Operator is not the proper party to review the same. In this regard, it bears stressing that it is the System	14.4.9 The System Operator shall perform reconciliation with the Generation Company and provide the results of its validation of the reported discrepancies within seven (7) working days from the receipt of the request from the Market Operator.		

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		<p>Instruction Report shall be maintained. If the Generation Company claims additional compensation related to the reported discrepancies that were not validated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.</p>	<p><u>Generator Company must report these to the Market Operator within three (3) working days from the receipt of the report. The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies. The System Operator shall then provide the results of its re-validation within seven (7) working days from receiving the request from the Market Operator.</u></p>	<p>submitted report on the discrepancy claims.</p>	<p>Operator who is the owner of the data subject of the DIRs.</p> <p>(2) The proposed amendment should provide a period within which the Market Operator shall refer the request for revalidation to the System Operator. For consistency, we suggest that the period be two (2) working days from receipt of such request.</p> <p>(3) Similarly, the proposed amendment shall provide guidelines for cases where the System Operator failed to provide the results of its re-validation within the prescribed timeline.</p>	<p>If the Market Operator has not received any validation within the prescribed timeline, the published data from the Dispatch Instruction Report shall be maintained.</p> <p>If the Trading Participants find any further discrepancies in the submitted report, the Generator Company must report these to the Market Operator within three (3) working days from its receipt of the validation report. The Market Operator shall review the revalidation</p>		

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			<p>compensation related to the reported discrepancies that were not validated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.</p>		<p>At present, the proposal only considers cases where the Market Operator has not received any validation (i.e., first validation) within the prescribed timeline. To this end, it is proposed that in cases where the System Operator failed to provide the results of its re-validation within the prescribed timeline, the data from the first validation report be maintained.</p>	<p>request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies. Within two (2) working days from receipt of such report from the Generator Company, the Market Operator shall then request the System Operator to re-validate the reported discrepancies. The System Operator shall then provide the results of its re-validation within seven (7) working days from receiving the request from the Market Operator.</p>		

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						<p>If the Market Operator has not received any revalidation within the prescribed timeline, the data from the initial validation report shall be maintained.</p> <p>If the Generation Company claims additional compensation related to the reported discrepancies that were not validated or revalidated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.</p>		

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Reporting and Publication	WESM DP 17.5.3	17.5.3 The System Operator shall provide the results of its validation of the reported discrepancies within seven (7) working days from receipt of the request from the Market Operator. If the Market Operator has not received any validation within the prescribed timeline, the Market Operator shall consider the submitted discrepancies by the Generator as valid.	<p>17.5.3 The System Operator shall provide the results of its validation of the reported discrepancies within seven (7) working days from receipt of the request from the Market Operator.</p> <p><u>If the Trading Participants find any further discrepancies in the submitted report, the Generator Company must report these to the Market Operator within three (3) working days from the receipt of the report. The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies. The System Operator shall then provide the results of its re-validation within seven (7) working days</u></p>	To include a provision for the revalidation process of data related to MRU contained in the Dispatch Instruction Report should the Generator Companies submit a request for further validation of the System Operator's submitted report on the discrepancy claims.	<p>Same comment as (1) to (3) above.</p> <p>In addition, to be consistent with Section 14.4.9, in the event that the System Operator fails to provide the validation within the prescribed timeline, it is recommended the data from the DIR shall be maintained. Similarly, it is recommended that the data from the initial validation report shall be maintained in case the System Operator fails to provide the results of its revalidation within the prescribed timeline.</p>	<p>17.5.3 The System Operator shall provide the results of its validation of the reported discrepancies within seven (7) working days from receipt of the request from the Market Operator.</p> <p>If the Market Operator has not received any validation within the prescribed timeline, the published data from the Dispatch Instruction Report shall be maintained.</p> <p>If the Trading Participants find any further discrepancies in the submitted report, the Generator</p>		

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			<p><u>from receiving the request from the Market Operator.</u></p> <p>If the Market Operator has not received any validation within the prescribed timeline, the Market Operator shall consider the submitted discrepancies by the Generator as valid.</p>			<p>Company must report these to the Market Operator within three (3) working days from its receipt of the validation report. The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies. Within two (2) working days from receipt of such report from the Generator Company, the Market Operator shall then request the System Operator to re-validate the</p>		

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						<p>reported discrepancies. The System Operator shall then provide the results of its re-validation within seven (7) working days from receiving the request from the Market Operator.</p> <p>If the Market Operator has not received any revalidation within the prescribed timeline, the data from the initial validation report shall be maintained.</p>		

Note: For convenience, please underline and put in bold letters the proposed additions and strikethrough the proposed deletions.