



ORCP-WM-25-01

Date Received by Secretariat: 15-Jan-2025

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.*



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	LAWRENCE S. FERNANDEZ	
Designation		
Company	MERALCO	
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>May we ask the reasons for these discrepancies that would necessitate the proposed additional ten working days for revalidation?</p> <p>Introducing additional time for revalidation would lead to larger and more frequent deviations between the preliminary and final bills. This would distort the price signals from the market.</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 Instruction Report shall be maintained. If the	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 Generator Company must report these to the Market</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 submitted report on	May we ask the reasons for these discrepancies that would necessitate the proposed additional ten working days for revalidation? We request clarification on the rationale behind the additional seven (7) working days to revalidate the reconciliation prepared by the SO			

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
		<p>Generation claims 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>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>the discrepancy claims.</p>	<p>on top of the three (3) working days within which generation companies may report discrepancies. This brings the total additional number of working days to ten (10), not including the period within which the Market Operator is supposed to review the revalidation request.</p> <p>Instead, we recommend that the current validation process be reviewed and strengthened to eliminate the need for revalidation/ rework or request for additional days for validation within the operational</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. If the Generation Company additional claims compensation related to the reported discrepancies that</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
			were not validated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.		timetable. Maintaining the current timeline will also reduce the likelihood of introducing additional modifications or adjustments between the preliminary and final settlement statements. Introducing additional time for revalidation would lead to larger and more frequent deviations between the preliminary and final bills. This would distort the price signals from the market.		
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	17.5.3 The System Operator shall provide the results of its validation of the reported discrepancies	To include a provision for the revalidation process of data related to	May we ask the reasons for these discrepancies that would necessitate		

WESM Manual on Dispatch Protocol Issue 22.1						
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments
		<p>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>	<p>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 from receiving the request from the Market Operator.</u></p>	<p>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>	<p>the proposed additional ten working days for revalidation?</p> <p>We request clarification on the rationale behind the additional seven (7) working days to revalidate the reconciliation prepared by the SO on top of the three (3) working days within which generation companies may report discrepancies. This brings the total additional number of working days to ten (10), not including the period within which the Market Operator is supposed to review the revalidation request.</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
			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.		Instead, we recommend that the current validation process be reviewed and strengthened to eliminate the need for revalidation/ rework or request for additional days for validation within the operational timetable. Maintaining the current timeline will also reduce the likelihood of introducing additional modifications or adjustments between the preliminary and final settlement statements.			

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