



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.

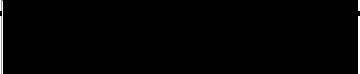
VIII. REFERENCES

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



TO BE ACCOMPLISHED BY THE PARTY SUBMITTING THE COMMENTS

Commenter's Information

Name	 Eduardo Hayes E. Nidea
Designation	
Company	Philippine Electricity Market Corporation
Company Address	
Telephone No.	
Email Address	

Proposed Amendments to the WESM Manual on Dispatch Protocol Issue 22.1

Commenter	General Comments	Proponent’s Response
PEMC	<div>1. What are reasons/examples why the System Operator and a Generation Company are unable to reconcile DIR discrepancies within one validation process that makes an additional revalidation process necessary?</div> <div>2. For Market Operator’s clarification: DPM Sections 14.4.9 and 17.5.3 provides the following statements on which information shall be considered valid if it does not receive any validation from the System Operator within the prescribed timeline:<ul style="list-style-type: none">• Sec. 14.4.9 (under “Sec 14. Post-dispatch Data and Operation Reports”) – the MO shall consider the published DIR valid• Sec 17.5.3 (under “Sec 17. Management of Must-Run Units”) – the MO shall consider the Generation Company’s submitted discrepancy as valid.<div>Requesting clarification from MO if, pursuant to Sec. 17.5.3 above, it has a separate treatment of MRU data apart from all other data in the DIR such that a Generation Company’s discrepancy report related to MRUs is considered valid?</div><div>3. For MO: How might an extended DIR validation process, as being proposed, affect the processing of additional compensation for the concerned Generation Company?</div><div>4. For information and clarification: On Impact to Compliance Monitoring Process</div><div>The proposed amendment to the Dispatch Instruction Report (DIR) validation/revalidation timeline will not affect the compliance monitoring activity of ECO, particularly in Dispatch Conformance Standards (DCS)</div></div> <div></div>	

Commenter	General Comments	Proponent's Response
	<p>and Reserve Conformance Standards (RCS) monitoring, in terms of: (a) verifying re-dispatch instructions of SO; and (b) identifying potential non-compliance of Dispatchable Reserves (DR) with RCS 6-8. Our flagging tool utilizes the DIR received daily via FTP from Independent Electricity Market Operator of the Philippines (IEMOP), particularly the DR utilization (MW_TO) instructions included in the report.</p> <p>If such information is subject to revalidation, providing both validated and revalidated DIRs through IEMOP via the established data provision protocol between PEMC and IEMOP (via FTP) would help avoid disruptions to the current DIR data processing setup of PEMC. Additionally, will we also be able to identify which versions are the latest or have been revalidated?</p> <p>The revalidated DIRs will be useful for the ECO in validating and assessing claims related to DIR discrepancies raised by the Trading Participants and the Ancillary Services Providers (ASPs). Even with the additional seven (7) days for revalidation by the System Operator, these documents remain relevant during the monitoring with the DCS per monitoring cycle, and the Request for Reassessment (RRA) stage of the RCS, occurring within two (2) months of the relevant billing period.</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	14.4.9 The System Operator shall perform reconciliation with the Generation Company and	Rationale of the Proposal	(1) Will the SO provide a revised DIR after its first validation? If so,	14.4.9 The System Operator shall perform reconciliation with		

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		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 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>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.</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</u></p>	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 the discrepancy claims.	<p>requesting confirmation from the Market Operator if it shall re-publish a revised DIR based on the System Operator's revalidation, pursuant to the timeline set in the Market Information Catalogue in Annex A of the WESM Manual on MO Information Disclosure and Confidentiality (page 17).</p> <p>(2) Suggest clarifying to whom the System Operator shall provide the validated or revalidated DIR (See proposed re-wording)</p>	<p>the Generation Company and provide the Market Operator the revised Dispatch Instruction Report based on the results of its validation of the reported discrepancies within seven (7) working days from the receipt of the request from the Market Operator.</p> <p>If the Trading Participants find there are any further discrepancies in the submitted report revised Dispatch Instruction Report:</p> <p>a) The Generator Generation</p>		

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Decision
			<p><u>request from the Market Operator.</u></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 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>(3) Against what criteria will the Market Operator determine if the Generating Company's revalidation request has merit? Based on which document will the MO and the GenCo use for the revalidation?</p> <p>(4) How many days will the Market Operator undertake the review for the revalidation? The MO's timeline for its review is not specified in the proposed amendment.</p> <p>(5) Suggesting to itemize the proposed new paragraph to clearly distinguish the</p>	<p><u>Company must may report these the discrepancies to the Market Operator within three (3) working days from the receipt publication of the revised report.</u></p> <p><u>b) The Market Operator shall review assess the revalidation request and, if deemed found to be with have merit, shall then request the System Operator to revalidate the reported discrepancies.</u></p> <p><u>c) The System Operator shall then provide the Market Operator with a revised</u></p>		

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					responsibilities of entities involved.	<p><u>Dispatch Instruction Report, reflecting the revalidation results, of its revalidation, within seven (7) working days from receiving receipt of the revalidation request from the Market Operator.</u></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 claims additional compensation related to the reported</p>		

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						discrepancies that were not validated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.		
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.	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. <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</u>	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.	Same comments as Sec. 14.4.9 (See <i>proposed re-wording</i>)	17.5.3 The System Operator shall provide the Market Operator the revised Dispatch Instruction Report based on 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 Trading Participants find		

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			<p><u>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>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><u>there are any further discrepancies in the submitted report revised Dispatch Instruction Report:</u></p> <p><u>a) The Generator Generation Company must may report these the discrepancies to the Market Operator within three (3) working days from the receipt publication of the revised report.</u></p> <p><u>b) The Market Operator shall review assess the revalidation request and, if deemed found to be with have merit, shall then</u></p>		

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						<p><u>request the System Operator to revalidate the reported discrepancies.</u></p> <p><u>c) The System Operator shall then provide the Market Operator with a revised Dispatch Instruction Report, reflecting the revalidation results, of its revalidation, within seven (7) working days from receiving receipt of the revalidation request from the Market Operator.</u></p> <p>If the Market Operator has not received any validation within the prescribed timeline,</p>		

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						the Market Operator shall consider the submitted discrepancies by the Generator as valid.		

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