



ORCP-WM-25-01

Date Received by Secretariat: 15-Jan-2025

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## REQUEST FOR MARKET RULES AND MANUALS AMENDMENTS

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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](mailto: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	<b>Reynaldo B. Abadilla</b>
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.*

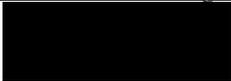


Philippine Electricity  
Market Corporation

**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 O. Arcenal] <i>[Signature over Name]</i>
Designation	
Company	SPC Power Corporation / SPC Island Power 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
<p>SPC Power Corporation / SPC Island Power Corporation</p>	<p>We suggest that the validation and further validation (revalidation) process on the discrepancies in the Dispatch Instruction Report (DIR) be integrated/included in the Central Registration and Settlement System (CRSS) since the data of the DIR are settlement issues. Thru CRSS parties (System Operator-SO, Market Operator-MO and Generation Companies) can monitor the updates and outcome of the process.</p> <p>Our companies usually sent our DIR discrepancies thru MO's Central Ticketing System, however the SO is not performing joint reconciliation with our companies, to wit "14.4.9 The System Operator shall perform reconciliation <b>with</b> the Generation Company", as a result when the DIR validation from the SO is received and posted by the MO in their public website, there were instances that we further seek clarification and contest the validated data that was sent/mailed to us (and also posted in the public website) by the MO. But the MO will insist that their validation process is finished/over and had email/final reply to us and to wit:</p> <p>"Should you have further concerns, you may contact Mr. Joselito Quilala of NGCPs System Operations through his email jcquilala@ngcp.ph. Thank you."</p> <p>As we contacted the above SO's contact, they are not aware on the further validation process and did not know the moving forward on how to change the uploaded/posted validated report in the MO's public website, merely because of no SO and MO protocols on further validation process.</p> <p>With the above circumstances, our companies incurred financial losses on our generated power due to (1) lack of initiative of joint reconciliation of the SO with the Generation companies, and (2) due to deficiency of protocols on the further validation process of MO and SO.</p>	

Commenter	General Comments	Proponent's Response
	<p>Thus, we hope that this revisiting of the DIR discrepancy process will give the best and clearest protocols among the SO, MO and Generation Companies. Also, we hope that in order to avoid DIR discrepancies or DIR undeclared occurrences with generating plants, the SO will religiously, dutifully and correctly log all the dispatch instructions to all generating plants every dispatch interval. If the above situation (religiously, dutifully and correctly log all the dispatch instructions to all generating plants every dispatch interval) is being done by the SO, no further burdens or inconveniences will be experienced by generating plants and MO.</p> <p>May we further know the following:</p> <ol style="list-style-type: none"> <li>1. How many revalidation process can be permitted?</li> <li>2. Can PEMC-ECO investigate (thru its motu proprio) why the SO have DIR discrepancies or DIR undeclared occurrences with generating plants since all DIRs are obligation and compliance from the SO?</li> <li>3. How can the SO mitigate/avoid the DIR discrepancies or DIR undeclared occurrences with generating plants which been lingering/present in the WESM for many years?</li> </ol> <p><i>[Please write general comments here, if any.]</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	14.4.9 The System Operator shall perform reconciliation with the Generation Company and provide the results of its validation of the reported	Rationale of the Proposal  To include a provision for the revalidation process	We suggest that the validation and further validation (revalidation) process on the discrepancies in the	14.4.9 The System Operator shall perform <b>jointly</b> reconciliation with the Generation Company and		

**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>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>	<p>discrepancies within seven (7) working days from the receipt of the request from the Market Operator.</p> <p><b><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></b></p>	<p>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>	<p>Dispatch Instruction Report (DIR) be integrated/included in the Central Registration and Settlement System (CRSS) since the data of the DIR are settlement issues. Thru CRSS parties (System Operator-SO, Market Operator-MO and Generation Companies) can monitor the updates and outcome of the process.</p> <p>Our companies usually sent our DIR discrepancies thru MO's Central Ticketing System, however the SO is not performing joint reconciliation with our companies, to wit "14.4.9 The System Operator</p>	<p>provide the results of its validation of the reported discrepancies <b><u>thru Market Operator's Central Registration and Settlement System (CRSS)</u></b> within seven (7) working days from the receipt of the request from the Market Operator.</p> <p><b><u>If the Trading Participants find any further discrepancies in the submitted report thru (CRSS), the Generator Company must report these to the Market Operator within three five (35) working days from the receipt of the report thru</u></b></p>		

**WESM Manual on Dispatch Protocol Issue 22.1**

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			<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>shall perform reconciliation <b>with</b> the Generation Company”, as a result when the DIR validation from the SO is received and posted by the MO in their public website, there were instances that we further seek clarification and contest the validated data that was sent/emailed to us (and also posted in the public website) by the MO. But the MO will insist that their validation process is finished/over and had email/final reply to us and to wit:</p> <p>“Should you have further concerns, you may contact Mr. Joselito Quilala</p>	<p><b><u>(CRSS). 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 thru (CRSS). The System Operator shall then provide the results of its re-validation thru (CRSS) within seven (7) working days from receiving the request from the Market Operator.</u></b></p> <p>If the Market Operator has not received any validation within the prescribed timeline, the published data</p>		

**WESM Manual on Dispatch Protocol Issue 22.1**

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					<p>of NGCPs System Operations through his email jcquilala@ngcp.ph. Thank you.”</p> <p>As we contacted the above SO's contact, they are not aware on the further validation process and did not know the moving forward on how to change the uploaded/posted validated report in the MO's public website, merely because of no SO and MO protocols on further validation process.</p> <p>With the above circumstances, our companies incurred financial losses on our generated power due to (1)</p>	<p>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>		

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					<p>lack of initiative of joint reconciliation of the SO with the Generation companies, and (2) due to deficiency of protocols on the further validation process of MO and SO.</p> <p>Thus, we hope that this revisiting of the DIR discrepancy process will give the best and clearest protocols among the SO, MO and Generation Companies.</p> <p>May we further know how many revalidation process can be permitted?</p>			
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	17.5.3 The System Operator shall provide the results of its validation of the reported discrepancies within seven (7) working	To include a provision for the revalidation process of data related to MRU contained in		17.5.3 The System Operator shall provide the results of its validation of the reported		

**WESM Manual on Dispatch Protocol Issue 22.1**

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		<p>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>days from receipt of the request from the Market Operator.</p> <p><b><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></b></p>	<p>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>discrepancies <b><u>thru Market Operator's Central Registration and Settlement System (CRSS)</u></b> within seven (7) working days from receipt of the request from the Market Operator.</p> <p><b><u>If the Trading Participants find any further discrepancies in the submitted report thru (CRSS), the Generator Company must report these to the Market Operator within three five (35) working days from the receipt of the report thru (CRSS). The Market Operator shall review the</u></b></p>		

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			<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>revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies thru (CRSS). The System Operator shall then provide the results of its re-validation thru (CRSS) within seven (7) working days from receiving the request from the Market Operator.</u></p> <p>If the Market Operator has not received any revalidation from the System Operator within the prescribed timeline, the Market Operator shall</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
						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.*