

ORCP-WR-WM-22-08
Date Received by RCC: 10/28/2022

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 are 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
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Contact No: (+632) 8631-8734

I. Proponent's Information

Name	[REDACTED]
Designation	Market Surveillance Committee (MSC) [REDACTED] / Compliance Committee (CC) [REDACTED]
Company	Philippine Electricity Market Corporation (PEMC)
Company Address	[REDACTED] [REDACTED]
Telephone No.	
Fax. No.	
Email Address	[REDACTED]

II. Amendment Information

Proposed Amendments to the (please tick the box):

☒ WESM Rules ☐ Retail Rules

☒ Market Manual: WESM Manual on Dispatch Protocol Issue 16.0

Topic: Proposed Amendments to the WESM Rules and WESM Manual on Dispatch Protocol regarding Maximum Available Capacity

Proposed Classification of Amendments (please tick the box):

☒ General ☐ Minor ☐ Urgent

If Urgent, reason for urgency:

III. SUMMARY OF THE PROPOSED RULES CHANGE

The proposed amendments to the WESM Rules and WESM Manual on Dispatch Protocol will provide a clearer guidance and include other conditions (e.g., circuit breaker status, ramp rates) that shall be considered by the Trading Participants when offering/bidding or revising/updating offers in the market.

IV. BACKGROUND

When a Trading Participant offers in the market, it includes (1) the quantity willing to be sold in the WESM, (2) the price at which the quantities are willing to be sold, and (3) the ramp rates that determine the capability of a plant to reach a target generation/schedule. These are some of the key inputs in determining prices and schedules in the market.

The Must-Offer Rule (MOR) prohibits generators in offering capacities below their registered capacity (Pmax) without a valid or justifiable cause. The act of offering in the market implies that they are willing and capable to run when dispatched at certain price levels.

However, there were instances when Trading Participants offer in the WESM without clear intention of generating energy for the grid. This is done by opening the breaker so that no schedule will be given, and offers/bids will not be considered in the optimization due to plant's disconnection from the grid. This act is a possible circumvention of the MOR and shows a disconnect between the intention to run by offering capacities, and the actual plan

of not running. In so doing, the Trading Participants are able to free themselves from the possible flagging of probable breach of the MOR.

Aside from the opening of the breaker, Trading Participants can also offer very low ramp rates as would render it impossible for the generating unit or plant to attain the offered capacity in the market. In this manner, they also impact the maximum available capacity that they can produce thereby defeating the purpose of the MOR. While this is currently allowed in the rules, the proponent believes that generators should be more aware of the impact or consequences of their actions vis-à-vis their obligations in the WESM.

V. THE PROPOSED RULES CHANGE

The proposed amendments to the WESM Rules and WESM Manual on Dispatch Protocol aim to:

- have a clearer definition of maximum available capacity;
- provide guidance when offering/bidding or revising/updating of offers, which should be equal to the maximum available capacity;
- require Trading Participants to revise offers/bids if they do not reflect reasonable estimates of the unit's maximum available capacity; and
- include other conditions (e.g., circuit breaker status, ramp rates) in revising/updating offers.

By implementing the proposed rules changes, Trading Participants will reflect more accurately the maximum available capacity of the generating unit by considering other plant conditions in their market offers which achieves the objectives of the proposed amendments. These plant conditions will be part of the considerations of the Enforcement and Compliance Office (ECO) during the validation of the reasons or justifications provided.

In addition, the proposed amendments will encourage Trading Participants to be more responsible in accounting for permissible limitations in their offers and to recommend a more stringent process in monitoring the MOR following the proposed rules changes.

VI. BACKGROUND AND DESCRIPTION OF THE PROPONENT

The proponent is the Market Surveillance Committee (MSC), alongside with the Compliance Committee (CC), as the co-proponent of the proposed amendments.

- a. **Market Surveillance Committee** – acts to monitor and report on activities in the spot market in accordance with the WESM Rules Clause 1.6

Chairman: Atty. Doroteo B. Agila
Members: Engr. Arthur N. Escalante
Engr. Christian M. Orias
Engr. Ferdinand P. Villareal
Engr. Peter L. Wallace

- b. **Compliance Committee** – acts to monitor compliance to and oversee the investigation of breach of the WESM Rules and Market Manuals by WESM Members, System Operator and the Market Operator, and to perform the functions set out in WESM Clause 1.8

Chairman: Dr. Peter Lee U

Members: Engr. Primo M. Lim III
Atty. Alejandro C. Dueñas II

VII. CONCLUSIONS AND RECOMMENDATIONS

The proposed amendments are recommended to be adopted, as this will improve the compliance of the Trading Participants with the MOR by being more responsible in offering/bidding and revising/updating of offers.

VIII. REFERENCES

- WESM Rules (as of May 06, 2022)
- WESM Manual on Dispatch Protocol Issue 16.0
- WESM Compliance Bulletin 11.0¹ – This issue of the WESM Compliance Bulletin provides for the updated Event Categories Guide for Generator-Trading Participants in Responding to Non-Compliance Notice/ Notice of Investigation

¹ <https://www.wesm.ph/downloads/download/TWFya2V0lFJlcG9ydHM=/MTMwNw==>

IX. Proposed Amendment to the WESM Rules and WESM Manual on Dispatch Protocol regarding Maximum Available Capacity

A. WESM Rules

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
<i>The Technical Committee prepared a separate document (see Annex A) to clarify its position on the matter which would not have been reflected in the RCC-prescribed form, for the RCC's consideration. Nevertheless, the TC provide its general comments as follows:</i> <i>1. Based on the understanding of the TC, the issue is regarding loopholes in the Must-Offer Rule (MOR) wherein Trading Participants offer in the WESM without clear intention of generating energy for the grid by (a) opening the breaker so that no schedule will be given or (b) submit very low ramp rates as would render it impossible for the generating units or plants to attain the offered capacity (i.e., self-imposed scheduling constraint). These allow the participants to circumvent the dispatch scheduling process without breaching the MOR (i.e., withholding of capacity).</i> <i>The TC suggests citing the undesirable impacts in the market to demonstrate the gravity of such actions. Examples of undesirable impacts would be frequent pricing errors, extreme price volatility, or sub-optimal dispatch. Price volatility and pricing errors can be observed and measured readily unlike actions relating to circumvention of MOR which require more detailed investigations. Measurement allows quantitative comparison of market outcomes with introduction of revised rules and procedures.</i> <i>2. Based on the TC's understanding, the amendment aims to provide clarity and guidance to Trading Participants in the submission and revision of generation offers in the market. The TC suggests adding the reduction of undesirable market outcomes (e.g., frequent pricing errors, extreme price volatility, or sub-optimal dispatch) to the purpose of the proposed amendment.</i> <i>3. It was concluded in the proposed amendment that, if adopted, "will improve the compliance of the Trading Participants with MOR by being more responsible in offering/bidding and revising/updating of offers". However, the TC does not share these views for the following reasons:</i>								

WESM Rules								
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- Trading Participants who are circumventing the MOR have demonstrated advanced knowledge and skills in the submission/revision of offers. Providing clarifications and guidelines will do very little to improve compliance because there is no breach or non-compliance in the first place. - The loopholes that are being exploited by Trading Participants are systemic or inherent in the market design and hence should be deterred accordingly. Defining "Maximum Available Capacity" is a good start but the proposed amendment fell short of the consistent contextual use of this term vis-à-vis "Registered Capacity". 4. Ramp rate nomination shall be based on the registered ramp rate if the intention really is to offer the maximum available capacity rate to avoid circumvention.								
Generation Offers and Data	3.5.5.1	Each Generation Company including Generation Companies with bilateral contracts shall submit a standing market offer for each of its scheduled generating units, battery energy storage systems and pumped-storage units for each dispatch interval in each trading day of the week in accordance with the timetable. The standing market offer shall apply until revised or updated by the Generation Company.	Each Generation Company including Generation Companies with bilateral contracts shall submit a standing market offer <u>equivalent to the registered capacity or maximum available capacity</u> , for each of its scheduled generating units, battery energy storage systems, and pumped-storage units for each dispatch interval in each trading day of the week in accordance with the timetable. The standing market offer shall apply until revised or updated by the Generation Company.	- The Generation Companies shall consider the "possible constraints", as defined in the maximum available capacity, in submitting a standing market offer. - To make sure that the offers in the market are readily available and TPs can provide.	The PGC definition of "Capability and Availability Declarations" as stated below implies that the data submissions of Generators require declaration of availability and capability for day-ahead dispatch scheduling. "Capability and Availability Declarations - Refers to the data submitted by the Generation Company for its Scheduled			

WESM Rules								
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					Generating Unit, which is used by the Market Operator in preparing the day-ahead Dispatch Schedule. It includes declaration of capability and Availability, Generation Scheduling and Dispatch Parameters, and Price Data.” This was not defined nor required in the proposed amendment. The TC suggest using this requirement in the proposed amendment and make the declarations binding up to the real-time dispatch.			
Revision of Market Offers/Bids,	3.5.11.1	Each <i>Trading Participant</i> which has submitted standing	Each <i>Trading Participant</i> which has submitted standing <i>offers</i> or bids for	To ensure that the revised/updated				

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
Nomination of Loading Levels, and Projected Outputs		<i>offers or bids for each of its scheduled generating unit, battery energy storage system and pumped-storage unit may revise any of its market offers or market bids for any dispatch interval in any trading day of the current week-ahead market horizon in accordance with the timetable, and subject to Clause 3.5.11.4 and each revised market offer or market bid submitted shall provide the information set out in Appendix A1.</i>	<i>each of its scheduled generating unit, battery energy storage system, and pumped-storage unit may revise any of its market offers or market bids <u>equivalent to the maximum available capacity and shall take into account the conditions under Clause 3.5.11.5 and Clause 3.5.11.6,</u> for any dispatch interval in any trading day of the current week-ahead market horizon. <u>Each revised market offer or market bid shall be submitted</u> in accordance with the timetable, and subject to Clause 3.5.11.4, and each revised market offer or market bid submitted shall provide the <u>contain</u> information set out in Appendix A1.</i>	market offer reflects the TP's readily available capacity. TPs to consider the conditions mentioned in 3.5.11.6 in revising/updating offers.				
Revision of Market Offers/Bids, Nomination	3.5.11.5	<i>Market bids or market offers for any dispatch interval may be revised by Trading Participants prior to</i>	<i>Market bids or market offers for any dispatch interval may <u>shall</u> be revised by Trading Participants prior to gate</i>	Requires TP to revise their offers if it does not represent a reasonable	Failure to revise is waiving a privilege and therefore revision is not required.			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
of Loading Levels, and Projected Outputs		gate closure if they no longer represent a reasonable estimate of: (a) the expected availability of the relevant <i>generating unit</i> or <i>scheduled load</i> for that <i>dispatch interval</i> ; or (b) the <i>demand bids</i> or <i>offers</i> likely to apply for the real-time <i>dispatch</i> optimization of that <i>dispatch interval</i> .	closure <u>in accordance with the timetable</u> if they no longer represent a reasonable estimate of: (a) the expected <i>availability</i> of the relevant <i>generating unit</i> <u>(e.g., plant breaker status, outage)</u> or <i>scheduled load</i> for that <i>dispatch interval</i> <u>in relation to its status, such as but not limited to, plant breaker status or commitment state</u> ; or (b) <u>the attainable capacity as may be affected by the ramp rate limitations encountered or likely to be encountered by the generating unit during the relevant</u>	estimate its maximum available capacity • Provided conditions to be taken in revising/updating offers • Revising/updating market bids shall be within the WESM timetable (Reference of timetable: DPM Sec. 4) • Insertion of "shall" to harmonize with DP 6.1.7 and require the TPs to revise the offers if it does not represent a reasonable estimate	Therefore, "...may be revised..." should be retained. • Do we really use "plant breaker"? Shall we maintain "circuit breaker"? • Do we accommodate "likely to be encountered"? We may turn-off or adjust projection based on performance parameters instead of the "likelihood to encounter" limitations. • We suggest that the MO revisit the criteria on bid nomination of generators which are not on outage, but the breaker is open.			

WESM Rules								
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			<u>dispatch interval; or</u> (c) the <i>demand bids</i> or <i>offers</i> likely to apply for the real-time <i>dispatch</i> optimization of that <i>dispatch interval</i>.		Available capacity nomination shall be based on the maximum capacity and the ramp rates shall be based on the registered ramp rates as certified by SO.			
Glossary	(new)	(Definition from Dispatch Protocol Manual) Availability. The duration of time over a specified period that a plant/unit is ready to be in service or operational.	<u>Availability. The duration of time over specified period that a plant is ready to be in service or operational state of readiness of a generating unit or facility for actual use, operation, or service for a particular time, period, or dispatch interval.</u>	- Added to provide clarity on the intent of availability mentioned in 3.5.11.5, that the plant is ready to provide service. - Transferred the definition from Dispatch Protocol Manual since this was already introduced in the WESM Rules	“Availability” is a reserved word in the electricity industry as a reliability metric, which is defined in the Philippine Grid Code (PGC) as: “The long-term average fraction of time that a Component or system is in service and satisfactorily performing its intended function. Also, the steady-state probability that a Component or system is in service.”			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					TC suggests not to use this term since their definitions are very different.			
Glossary	(new)	(Definition from Dispatch Protocol Manual) Maximum available capacity. Equal to the registered maximum capacity (Pmax) of the (aggregate) unit less forced unit <i>outages</i>, scheduled unit <i>outages</i>, de-rated capacity due to <i>technical constraints</i> and weather disturbance that cause damage to the unit or that would otherwise limit its ability to inject power to the <i>grid</i>. For co-generation systems, the <i>maximum available capacity</i> is further determined by taking into account the equivalent power of the thermal <i>energy</i>	<u>Maximum available capacity. Equal to the registered maximum capacity (Pmax) of the (aggregate) unit less forced unit outages, scheduled unit outages, de-rated capacity technical constraints and weather disturbance that cause damage to the unit or that would otherwise limit its ability to inject power to the grid.</u> For co-generation systems, the maximum available capacity is further determined by taking into account the equivalent power of the thermal energy extraction by the	- Transferred the definition from Dispatch Protocol Manual since this was already introduced in the WESM Rules - Previous definition includes the condition for co-generation systems. Proposed to delete since this condition is already specified in the definition of technical constraints including other conditions plant types.	The definition of the Maximum Available Capacity in the PGC is recommended, as follows: “Maximum Available Capacity - The sum of the Available Capacity/ies of the Generating Units of the Generating Plant.” In addition, the TC provides the following suggestions on how the definitions may improve the proposed amendment:			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		extraction by the energy host and technical constraints.	energy host and technical constraints.		• Registered Capacity should be defined as the tested/certified MW capacity on the COC of the Generator, or the most recent capacity test result authorized by the ERC. • Maximum Capacity should be defined as the maximum <u>gross</u> MW output of generating unit or plant according to the Registered Capacity. (Assumed: gross) • Pmax should be defined as the Maximum Capacity of generating unit or plant less demand for			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
					station service and auxiliaries. Note: Pmax is reckoned at the Market Trading Node for purposes of offer submission. Gross Maximum Capacity and Net Maximum Capacity need not be mentioned in the amendment.			
Glossary	(new)	(Definition from Dispatch Protocol Manual) Technical Constraint. Refers to plant equipment-related failure, limitations encountered during <i>start-up/shutdown</i> procedure, effects of ambient temperature and resource-related <i>constraints</i> due to the following: (a) water	<u>Technical Constraint. Refers to plant equipment related failure/constraints, limitations encountered during start up/shutdown procedure, effects of ambient temperature and resource-related constraints due to the following:</u> <u>(a) water elevation and diversion</u>	Transferred the definition from Dispatch Protocol Manual since this was already introduced in the WESM Rules	Why slash constraints with failure? Do they mean the same thing? Nevertheless, Technical Constraint is a very broad phrase that can apply to the generation, transmission, and distribution sectors.			

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		elevation and diversion requirements for domestic or irrigation use for hydro plants; (b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants; (c) unavailability of fuel resources that are not within the control of the <i>Generation Company</i> for biomass power plants; and (d) steam flow limitations, station <i>load</i> , and electricity demand of its <i>energy</i> host, in the case of the co-generation systems.	<u>requirements for domestic or irrigation use for hydro plants;</u> <u>(b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants;</u> <u>(c) unavailability of fuel resources that are not within the control of the Generation Company for biomass power plants; and</u> <u>(d) steam flow limitations, station load, and electricity demand of its energy host, in the case of the co-generation systems.</u>		TC suggests omitting this term being exclusively defined for generation.			

B. WESM Manual on Dispatch Protocol Issue 16.0

WESM Manual on Dispatch Protocol Issue 16.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
1. The TC believes that the terms used in the dispatch protocol should have the same meaning and context with that of the Philippine Grid Code (PGC) since this is the primary reference of the System Operator (SO), and the document is a protocol between the Market Operator (MO) and SO in providing services to the Trading Participants. See previous comments and suggestions in the matrix on how the definitions may improve the proposed amendment. 2. The aim of the proposed amendment to provide clarity and guidance to Trading Participant in the submission and revision of Generation Offers in the WESM will be ideal in understanding the dispatch protocol. However, the view of the TC is that there are bigger issues that need to be addressed in the WESM design to avoid the exploitation of loopholes and encourage greater responsibility and accountability of trading participants. The TC recommends a market design study on net pool and net settlement with advanced (day-ahead) scheduling of capacities with bilateral contracts. 3. Behaviors or actions of trading participants in the context of this proposed amendment would be difficult to observe or measure. This is more challenging if non-compliance or breach cannot be established. The TC suggests monitoring of undesirable market results or event which can be readily observed, measured, and correlated with participant actions or behaviors (e.g., pricing errors or spot price volatility). This approach can help justify the necessity of the proposed amendment and later quantify improvements in market performance with its implementation.								
BIDS, OFFERS AND DATA SUBMISSION AND PROCESSING	Background	6.1.7 WESM Rules Clause 3.5.11.5 requires <i>Trading Participants</i> to revise their <i>bids</i> or <i>offers</i> if they no longer represent a reasonable estimate of either the expected <i>availability</i> for the <i>dispatch interval</i> of the	6.1.7 WESM Rules Clause 3.5.11.5 requires <i>Trading Participants</i> to revise their <i>bids</i> or <i>offers</i> if they no longer represent a reasonable estimate of either the expected <u><i>status</i></u> and <u><i>availability</i></u> (e.g., <u><i>plant breaker status, outage</i></u>) for the <i>dispatch interval</i> of the relevant <i>generating unit</i> .	- To include other conditions in revising offers and cite samples - To harmonize with the proposed amendment in				

WESM Manual on Dispatch Protocol Issue 16.0

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		relevant <i>generating unit</i> or <i>scheduled load</i> or the <i>demand bids</i> or <i>offers</i> likely to apply in the <i>real-time dispatch</i> optimization for the <i>dispatch interval</i> .	<u>ramp rate limitations from the plant statuses in attaining the market bids or market offers,</u> or <i>scheduled load</i> or the <i>demand bids</i> or <i>offers</i> likely to apply in the <i>real-time dispatch</i> optimization for the <i>dispatch interval</i> .	WESM Rules Clause 3.5.11.5				
BIDS, OFFERS AND DATA SUBMISSION AND PROCESSING	Background	6.1.8 Pursuant to <i>WESM Rules</i> Clause 3.5.11.6, <i>Trading Participants</i> that cancel their <i>bids</i> or <i>offers</i> , or submit <i>bids</i> or <i>offers</i> less than the registered capacity or <i>maximum available capacity</i> of their <i>facility</i> or <i>generating unit</i> are required to provide information on the reasons or circumstances of such cancellation or submission.	6.1.8 Pursuant to <i>WESM Rules</i> Clause 3.5.11.6, <i>Trading Participants</i> that cancel their <i>bids</i> or <i>offers</i> , or submit <i>bids</i> or <i>offers</i> less than the registered capacity or maximum available capacity of their <i>facility</i> or <i>generating unit</i> are required to provide information on the reasons or circumstances of such cancellation or submission.	- Trading Participants who cancel their <i>bids/offers</i> or submit <i>bids</i> or <i>offers</i> less than the registered capacity, shall provide reasons or justifications. - To harmonize with <i>WESM Rules</i> Clause 3.5.11.6				
BIDS, OFFERS AND DATA	Revisions of Self-scheduled	6.13 <i>Trading Participants</i> shall revise their <i>self-</i>	6.13 <i>Trading Participants</i> shall revise their <i>self-scheduled nominations</i> ,	To include other conditions in				

WESM Manual on Dispatch Protocol Issue 16.0

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
SUBMISSION AND PROCESSING	Nominations, Bids and Offers Based on Reasonable Estimates	<i>scheduled nominations, bids, or offers, if the self-scheduled nominations, bids or offers submitted no longer represent a reasonable estimate of either the following:</i> a. The expected <i>availability</i> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> or <i>scheduled load</i>; or b. The <i>loading level, projected output, bid or offer</i>	<i>bids, or offers, if the self-scheduled nominations, bids or offers submitted no longer represent a reasonable estimate of either the following:</i> a. The expected <u>status</u> and <u>availability (e.g., plant breaker status, outage)</u> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> or <i>scheduled load</i> <u>in relation to its status, such as but not limited to, plant breaker status or commitment state;</u> or b. <u>The attainable capacity as may be affected by the ramp rate limitations encountered or likely to be encountered by the generating unit</u>	revising offers and cite samples To harmonize with the proposed amendment in WESM Rules Clause 3.5.11.5				

WESM Manual on Dispatch Protocol Issue 16.0

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			<u>during the relevant dispatch interval;</u> <u>or</u> c. The <i>loading level, projected output, bid or offer.</i>					
DEFINITIONS, REFERENCES AND INTERPRETATION	Definitions	2.1.2 The following words and phrases as used in this <i>Market Manual</i> shall have the following meaning: a. Ancillary Service Procurement Agreement b. Automatic Generation Control c. Automatic Load Dropping (ALD) d. Availability. The duration of time over a specified period that a plant/unit is ready to be in service or operational. e. xxx	2.1.2 The following words and phrases as used in this <i>Market Manual</i> shall have the following meaning: a. Ancillary Service Procurement Agreement b. Automatic Generation Control c. Automatic Load Dropping (ALD) d. Availability. The duration of time over a specified period that a plant/unit is ready to be in service or operational. e. Bid f. Capability g. Cascading Outages h. Contingency	- To refer the definition of terms to WESM Rules - Clerical enhancements				

WESM Manual on Dispatch Protocol Issue 16.0

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		. . . s. Maximum available capacity. Equal to the registered maximum capacity (Pmax) of the (aggregate) unit less forced unit <i>outages</i>, scheduled unit <i>outages</i>, de-rated capacity due to <i>technical constraints</i> and weather disturbance that cause damage to the unit or that would otherwise limit its ability to inject power to the <i>grid</i>. For co-generation systems, the <i>maximum available capacity</i> is further determined by taking into account the equivalent power of the thermal energy extraction by the	ih. Contingency Reserve ji. Demand Control kj. Demand Control Imminent Warning lk. Dispatchable Reserve ml. Disturbance nm. Frequency control on. Generator po. Load shedding qp. Manual Load Dropping rq. Market Management System (MMS) s. Maximum available capacity. Equal to the registered maximum capacity (Pmax) of the (aggregate) unit less forced unit outages, scheduled unit outages, de-rated capacity due to technical constraints and weather disturbance that cause damage to the unit or that would otherwise limit its ability to inject power to the grid. For co-generation systems, the maximum available					

WESM Manual on Dispatch Protocol Issue 16.0

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		<i>energy host and technical constraints.</i> t. xxx . . . jj. Technical Constraint. Refers to plant equipment-related failure, limitations encountered during <i>start-up/shutdown</i> procedure, effects of ambient temperature and resource-related <i>constraints</i> due to the following: (a) water elevation and diversion requirements for domestic or irrigation use for hydro plants; (b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and	capacity is further determined by taking into account the equivalent power of the thermal energy extraction by the energy host and technical constraints. tr. MMS-Market Participant Interface (MPI) us. Multiple Outage Contingency vt. Offer wu. Operating Margin xy. Preferential Dispatch Units yw. Real-Time Data zx. Real-Time Dispatch aay. Red Alert bbz. Regulating Reserve ccaa. Security ddbb. Self-scheduled nomination eecc. Shutdown ffdd. Stability					

WESM Manual on Dispatch Protocol Issue 16.0

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
		temperature) for geothermal plants; (c) unavailability of fuel resources that are not within the control of the <i>Generation Company</i> for biomass power plants; and (d) steam flow limitations, station <i>load</i> , and electricity demand of its <i>energy</i> host, in the case of the co-generation systems.	ggg. Start-up hhh. System Integrity Protection Scheme (SIPS) iii. System Operator System Advisories jj. Technical Constraint. Refers to plant equipment-related failure, limitations encountered during start-up/shutdown procedure, effects of ambient temperature and resource-related constraints due to the following: (a) water elevation and diversion requirements for domestic or irrigation use for hydro plants; (b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants; (c) unavailability of fuel resources that are not within the control of the <i>Generation Company</i> for biomass power plants; and (d) steam flow limitations, station <i>load</i>, and electricity demand of its <i>energy</i> host,					
		kk. xxx						
		ll. xxx						
		mm. xxx						

WESM Manual on Dispatch Protocol Issue 16.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Agreement
			in the case of the co-generation systems. kk hh . Voltage Control li . Voltage Instability mm jj . Voltage Sag					

Note: Please underline and put in bold letters the proposed changes to the Market Rules or Manual.