

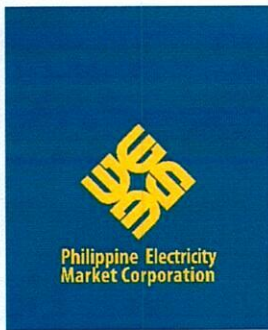
Proposed General Amendments to various WESM Manuals on the option to use the Final Metered Quantity (MQ) data as the basis for the Final Bilateral Contract Quantity (BCQ) of a Fully-contracted Generation Company

**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	[REDACTED]
Designation	[REDACTED]
Company	Independent Electricity Market Operator of the Philippines Inc.
Company Address	[REDACTED] [REDACTED] [REDACTED]
Telephone No.	[REDACTED]
Email Address	[REDACTED]



Proposed General Amendments to various WESM Manuals on the option to use the Final Metered Quantity (MQ) data as the basis for the Final Bilateral Contract Quantity (BCQ) of a Fully-contracted Generation Company

ORCP-WM-25-04

**Call for Comments to the Proposed General Amendments to various WESM Manuals on the option to use the Final Metered Quantity (MQ) data as the basis for the Final Bilateral Contract Quantity (BCQ) of a Fully-contracted Generation Company (ORCP-WM-25-04)**

The Rules Change Committee (RCC) is inviting all WESM Members and interested parties to submit comments to the Proposed General Amendments to various WESM Manuals specifically on the option to use the Final Metered Quantity (MQ) data as the basis for the Final Bilateral Contract Quantity (BCQ) of a Fully-contracted Generation Company (ORCP-WM-25-04). The proponent is Jobin-SQM, Inc., a Direct WESM Member – Generation Company, and the owner and operator of Sta. Rita SPP and Subic New PV PPP.

The proposed amendments intend to address the incidental WESM transactions (and corresponding tax-related transactions) and Renewable Energy Certificate (REC) issuance of a fully-contracted Generation Company arising from discrepancies between daily MQ and final MQ.

The WESM documents for amendment are the WESM Manuals on:

1. Registration, Suspension and De-Registration Criteria and Procedures, Issue No. 18.0; and
2. Billing and Settlement, Issue No. 15.0.

**DOCUMENTS:**

Provided below are relevant materials for your reference:

- [Overview, Discussion Paper, and Matrix of Proposed Amendments](#)
- [Presentation of the Proposed Amendment and Illustration regarding the abovementioned incidental WESM transactions and REC issuance](#)
- [RCC Form3 Matrix of Proposed Amendments for Comments - Annexes of this document](#) (*Please write your comments in the proper columns in the matrix.*)

Kindly submit your comments (in Word format) through the **File a Submission** webpage no later than **07 October 2025** or 30 working days from the date of publication (26 August 2025). We recommend using **Firefox browser** for submitting your comments.

*Please input in the proper field the e-mail address of your point person(s) whom we could contact regarding activities related to the processing of the proposal. All comments received shall be published in the PEMC website.*

Thank you!

For the Rules Change Committee.

Proposed General Amendments to various WESM Manuals on the option to use the Final Metered Quantity (MQ) data as the basis for the Final Bilateral Contract Quantity (BCQ) of a Fully-contracted Generation Company

Commenter	General Comments	Proponent's Response
IEMOP	<p>The MQ/GESQ is provided to the MO by the MSP, hence, we follow what is the exact reading of the MSP whether it's for a Generator or Load.</p> <p>The proposal must include how the final metered quantities of a generation facility that wished to attribute its entire generation output will be accounted for the consumption of its customer. In this regard, the following considerations must be resolved:</p> <ul style="list-style-type: none"> <li>a. Scenarios on how the final metered quantities of a generation facility will be accounted for wherein there are multiple customers.</li> <li>b. Clear procedure/rule if the reading on the Generator side is higher than the Customer as provided by the MSP, in which case, the energy was consumed by some other customers in the WESM. As such, the proposal assumes that the customer agrees to pay for the imbalance.</li> <li>c. Clear procedure/rule if the Customer's consumption is more than the Generator's MQ/GESQ as provided by the MSP.</li> </ul> <p>The proposal may affect the current determination/implementation for the net settlement surplus (NSS) and future implementation of the Day-Ahead Market.</p> <p>The resolution of these general comments is required for the resolution of the specific comments below.</p>	

WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures, Issue No. 18.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Original Proponent's Response	RCC Decision
Enrolment	3.5.1	3.5.1.2 The notice to the <i>Market Operator</i> shall include the following:  XXX	3.5.1.2 The notice to <i>the Market Operator</i> shall include the following:  XXX  <b><u>e) An indication of whether the generation output of the generating facility is fully contracted to a Customer;</u></b> <b><u>f) If the generation is fully contracted as indicated in item (e), a declaration of whether the Generation Company elects to avail of the option to use the final metered quantity data as the basis for its final bilateral contract quantity data;</u></b> <b><u>e) g) re-numbering</u></b> <b><u>f) h) re-numbering</u></b> <b><u>g) i) re-numbering</u></b>	This provision ensures that the 100% bilateral contract is duly enrolled and recognized by the Market Operator. Such enrollment shall constitute the Participant's formal declaration of its full Bilateral Contract Quantity.	What happens to the original 3.5.1.2(e) to (g)?  Is the intention to add the proposed amendments to the existing components of the notice to the Market Operator?  If there is an indication that the generation output of the generating facility is fully contracted to a Customer, the final metered quantity data should already be the default applicable BCQ of the generator with the customer as the indication in item (e) is already an expression that the			

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WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures, Issue No. 18.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Original Proponent's Response	RCC Decision
					output of the generating facility is fully contracted to the customer.			
Enrolment	3.5.1	3.5.1.3 The <i>Market Operator</i> shall confirm by notice to the <i>Trading Participant</i> that the enrolled bilateral contract transactions shall be accounted for in the WESM settlements starting on the date stated on the notice submitted by the <i>Trading Participant</i> or on such other date as the <i>Market Operator</i> shall determine. The effectivity shall likewise be subject to compliance by the contract parties with relevant billing and settlement procedures in the WESM, particularly the relevant protocols on bilateral contract quantity declarations (the "BCQ").	3.5.1.3 The <i>Market Operator</i> shall confirm by notice to the <i>Trading Participant</i> that the enrolled bilateral contract transactions, shall be accounted for in the WESM settlements starting on the date stated on the notice submitted by the <i>Trading Participant</i> or on such other date as the <i>Market Operator</i> shall determine. <b><u>Should the Trading Participant elect of the option to use the final metered quantity data as basis for its final bilateral quantities, the same shall likewise be accounted for in the WESM settlements of such Trading Participant.</u></b> The	This provision ensures that the 100% bilateral contract is duly enrolled and recognized by the Market Operator.	If there is an indication that the generation output of the generating facility is fully contracted to a Customer, the final metered quantity data should already be the default applicable BCQ of the generator with the customer as indication in item (e) is already an expression that the output of the generating facility is fully contracted to the customer.			

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WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures, Issue No. 18.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Original Proponent's Response	RCC Decision
			effectivity shall likewise be subject to compliance by the contract parties with relevant billing and settlement procedures in the WESM, particularly the relevant protocols on bilateral contract quantity declarations (the "BCQ").					

WESM Manual on Billing and Settlement, Issue No. 15.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Original Proponent's Response	RCC Decision
Declarations for Energy Transactions	9.1	9.1.1 <i>Trading Participants</i> who will sell electricity pursuant to bilateral contracts during a dispatch interval and wish those bilateral contracts to be accounted for in settlements may declare to the <i>Market Operator</i> bilateral contract data up to the end of the following trading day.	9.1.1 <i>Trading Participants</i> who will sell electricity pursuant to bilateral contracts during a dispatch interval and wish those bilateral contracts to be accounted for in settlements may declare to the <i>Market Operator</i> bilateral contract data up to the end of the following trading day, <b><u>except to those Trading</u></b>	This aims that the 100% bilateral contracts with no MTN allocations will be excluded to the submission of daily BCQ declaration to the Market.	Same rationale as above.			

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WESM Manual on Billing and Settlement, Issue No. 15.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Original Proponent's Response	RCC Decision
			<u>Participants with bilateral contract covering their full generation but no daily BCQ allocation submission.</u>					
Declarations for Energy Transactions	9.1	NEW	<u>9.1.13 If the enrollment of the supply contract covering the bilateral contract declaration pertains to the full generation output of the generating facility, and the Generation Company elects to use the final Metered Quantity as the basis for its final Bilateral Contract Quantity, then the monthly final Metered Quantity submitted by the Metering Service Provider for said generating facility shall be deemed settled outside of the Market and shall be excluded from Spot Market settlement calculations.</u>	This provision aims to clarify that fully contracted Trading Participants who opt to use the final Metered Quantity (MQ) as their final Bilateral Contract Quantity (BCQ) may no longer submit daily BCQs if their submissions do not identify Market Trading Nodes (MTNs).	Same rational as provided above.			

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WESM Manual on Billing and Settlement, Issue No. 15.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Original Proponent's Response	RCC Decision
Declarations for Energy Transactions	9.1	NEW	<b><u>9.1.14 If the Generation Company referred to under Section 9.1.13 submits daily Bilateral Contract Quantities with identified Market Trading Nodes (MTNs), and the final Metered Quantity (MQ) differs from the daily MQ, the Market Operator shall consider the final monthly MQ as the final BCQ declared by the Generation Company to the Customer. This final BCQ shall be allocated to the Customer's MTNs based on the proportions reflected in the daily BCQ submissions.</u></b>	This aims to ensure that fully contracted Trading Participants who opt to use the final Metered Quantity (MQ) as their final Bilateral Contract Quantity (BCQ), and who have submitted daily BCQs with allocated MTNs, will use their final MQs as their final BCQs. For intervals where the daily MQ differs from the final MQ, the allocated MTNs in the daily BCQ shall be proportionally applied to the final BCQ using the final monthly MQ.	If the trading participants who expressed full contracting under proposed Clause 3.5.1.2(e) is not given the option whether to use final MQ or not, this proposed Clause 9.1.14 is no longer necessary.			

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WESM Manual on Billing and Settlement, Issue No. 15.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Original Proponent's Response	RCC Decision
Confirmation and Nullification for Energy Transactions	9.2	9.2.5 At the end of each trading day, the <i>Market Operator</i> shall notify all buying and selling <i>Trading Participants</i> , whose supply contract was enrolled to require confirmation and whose valid bilateral contract declarations was not confirmed, that their bilateral contract declarations shall not be accounted for during settlements.	9.2.5 At the end of each trading day, the <i>Market Operator</i> shall notify all buying and selling <i>Trading Participants</i> , whose supply contract was enrolled to require confirmation and whose valid bilateral contract declarations was not confirmed, that their bilateral contract declarations shall not be accounted for during settlements. <b><u>This notification shall not apply to Trading Participants whose bilateral contracts cover their full generation capacity, who elects to use the final Metered Quantity as the basis for their final Bilateral Contract Quantity, and who did not submit daily Bilateral Contract Quantities.</u></b>	The Market Operator shall no longer be required to issue daily notifications to fully contracted Trading Participants who opt to use the final Metered Quantity (MQ) as their final Bilateral Contract Quantity (BCQ) and have not submitted any daily BCQ declarations.	Same Rationale as provided above.			

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WESM Manual on Billing and Settlement, Issue No. 15.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Original Proponent's Response	RCC Decision
Confirmation and Nullification for Energy Transactions	9.2	9.2.6 At the end of each trading day, the <i>Market Operator</i> shall notify all buying and selling <i>Trading Participants</i> , whose supply contract was enrolled to not require confirmation and whose valid bilateral contract declarations was not nullified, that their bilateral contract declarations shall not be accounted for during settlements.	9.2.6 At the end of each trading day, the <i>Market Operator</i> shall notify all buying and selling <i>Trading Participants</i> , whose supply contract was enrolled to not require confirmation and whose valid bilateral contract declarations was not nullified, that their bilateral contract declarations shall not be accounted for during settlements. <b><u>This notification shall not apply to Trading Participants whose bilateral contracts cover their full generation capacity, who elects to use the final Metered Quantity as the basis for their final Bilateral Contract Quantity, and who did not submit daily Bilateral Contract Quantities.</u></b>	The Market Operator shall no longer be required to issue daily notifications to fully contracted Trading Participants who opt to use the final Metered Quantity (MQ) as their final Bilateral Contract Quantity (BCQ) and have not submitted any daily BCQ declarations.				

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WESM Manual on Billing and Settlement, Issue No. 15.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Original Proponent's Response	RCC Decision
Line Rental Calculation for Energy Transactions	9.3	NEW	<b><u>9.3.7 The Line Rental calculation for Trading Participants under Section 9.1.13 shall utilize the monthly final metered quantity submitted by the Metering Service Provider, which shall be deemed the final Bilateral Contract Quantity for each trading interval.</u></b>	This aims to clarify that line rental calculation shall use the monthly MQ from the MSP as the bilateral contract quantity of fully bilaterally contracted Trading Participants who availed the option to use final MQ as final BCQ.	We do not suggest adopting this provision since the formula for calculation of Line Rental remains the same and is unaffected with the use of final metered quantity as the final metered quantity is already deemed the BCQ declaration between buyers and sellers.			