

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.

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.]

Committer's Information

Name	[Redacted] [Signature over Name]
Designation	[Redacted]
Company	ACEN Corporation
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

Commenter	General Comments	Proponent's Response
ACEN Corporation	<p>1. The proposal should apply to both partially and fully contracted generator. As currently drafted, this is advantageous to fully contracted generators only, and is discriminatory against partially contracted generators, who will remain exposed to WESM sales and/or purchases to the extent of the variances of metered quantities.</p> <p>2. Market Operator should not have the capability to substitute participant declarations with the Final Metered Quantity - this should still be subject to the participant's discretion.</p> <p>3. We suggest revisiting the existing rules to enforce Metering Service Providers to provide accurate Metered Quantity to address the root cause of issue that this proposal is trying to address.</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	<p>3.5.1.2 The notice to the <i>Market Operator</i> shall include the following:</p> <p>XXX</p>	<p>3.5.1.2 The notice to the <i>Market Operator</i> shall include the following:</p> <p>XXX</p> <p><u>e) An indication of whether the generation output of the generating facility is fully</u></p>	<p>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</p>	<p>We believe it is important to ensure fairness in the application of the restriction in (e)-(f). The allowance to use the final MQ as the basis for BCQ should be extended to all generators to ensure</p>	<p>e) An indication of whether the generation output of the generating facility is contracted to a Customer;</p> <p>f) A declaration of whether the Generation Company elects to use the final metered quantity data</p>		

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			<p><u>contracted to a Customer;</u> <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> <u>e) g) re-numbering</u> <u>f) h) re-numbering</u> <u>g) i) re-numbering</u></p>	full Bilateral Contract Quantity.	equitable treatment, rather than being limited only to those that are fully contracted.	<p>as the basis for its final bilateral contract quantity, provided, that there is a discrepancy between the Daily Preliminary, and Final Metered Quantity published by IEMOP.</p> <p>g) re-numbering of original item (e);</p> <p>h) re-numbering of original item (f);</p> <p>i) re-numbering of original item (g).</p>		
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	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	This provision ensures that the 100% bilateral contract is duly enrolled and recognized by the Market Operator.	We believe that settlement adjustments based on final MQ should be managed through participant-driven re-declarations or the dispute process, as it is the MO's	3.5.1.3 xxx xxx xxx. Should the Daily Metered Quantity vary from the Preliminary and/or Final Metered Quantity, the trading participant may apply for re-declaration, with		

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	Original Proponent's Response	RCC Decision
		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").	the <i>Trading Participant</i> or on such other date as the <i>Market Operator</i> shall determine. <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> 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").		responsibility to oversee the process rather than to make declarations on behalf of participants. Should there be any re-declarations of Bilateral Contract Quantities arising from the inaccuracy of Metered Quantities, it should be limited to intervals with variances and Trading Participants should only be allowed to adjust to the extent of the variance. For a variance of 2MWh, Trading Participants should only either add or subtract 2MWh on the initial	the timeline specified in Section 4.2.3 of the Billing and Settlement Manual. Xxx xxx xxx		

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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
					Bilateral Contract Quantity declaration.			

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, <u>except to those Trading Participants with bilateral contract covering their full generation but no daily BCQ allocation submission.</u>	This aims that the 100% bilateral contracts with no MTN allocations will be excluded to the submission of daily BCQ declaration to the Market.	We believe it is important for all participants, including fully contracted generators, to continue submitting daily BCQ in accordance with the original rules. Re-declaration should be allowed only when there are variances in the final MQ, with appropriate	We suggest deleting the proposed additional provision.		

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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
					provisions for dispute resolution.			
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).	We suggest maintaining settlements within the WESM framework to ensure transparency and consistency. It is essential to hold MSPs accountable and to enable timely BCQ re-declaration, rather than excluding fully contracted generators from settlement.	We suggest deleting the proposed additional provision.		

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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	<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>	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.	We believe the MO should not be empowered to substitute participant declarations with the final MQ. Adjustments ought to remain participant-driven, with appropriate allowances for re-declaration or disputes beyond D+1, to uphold contractual integrity and fairness.	We suggest deleting the proposed additional provision.		

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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. <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>	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.	While we appreciate efforts to improve the process, we believe this amendment should not be adopted. It is important that all participants continue receiving notifications to ensure transparency and consistency in settlements.	We suggest deleting the proposed additional provision.		

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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. <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>	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.	We respectfully oppose this amendment. Maintaining universal notifications is essential to uphold transparency, fairness, and operational consistency.	We suggest deleting the proposed additional provision.		

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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	<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>	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 believe this amendment should be reconsidered. It is important that line rental and settlement processes remain participant-driven, with transparent declaration and correction mechanisms, rather than relying on automatic overrides based on MSP data.	We suggest deleting the proposed additional provision.		