

RDS-RRDSD-RegMD-RRA-2026-297
15 June 2026

ATTY. RACHEL ANGELA P. ANOSAN

Chairperson, Rules Change Committee
Philippine Electricity Market Corporation
18/F Robinsons Equitable Tower
ADB Avenue, Ortigas Center, Pasig City

ATTENTION: MR. BIENVENIDO C. MENDOZA, JR.

RCC Secretariat and Chief Market Assessment Officer, Market Assessment Group

SUBJECT: NGCP's COMMENTS ON SNAP GROUP's PROPOSED GENERAL AMENDMENTS TO WESM ANCILLARY SERVICES MONITORING MANUAL RELATIVE TO ADDITIONAL CONDITIONS FOR QUALIFYING A FREQUENCY DRIVEN EVENT

Dear **Chairperson Anosan**:

The National Grid Corporation of the Philippines (NGCP) would like to submit to the Philippine Electricity Market Corporation – Rules Change Committee the attached matrix¹ containing its comments on SNAP Group's Proposed General Amendments to the Wholesale Electricity Spot Market (WESM) Ancillary Services Monitoring Manual Issue 1.2 on Additional Conditions for Qualifying a Frequency Driven Event.

Thank you and we hope for the Committee's consideration on this submission.



MA. CYNTHIA Y. MANRIQUE

VP and Head, Revenue and Regulatory Affairs

Encl: *as stated*

¹ Attached as Annex A



ORCP-WM-26-03

Call for Comments to the Proposed General Amendments on Additional Conditions for Qualifying a Frequency Driven Event (FDE)

The Rules Change Committee (RCC) is inviting all WESM Members and interested parties to submit comments to SNAP Group's Proposed General Amendments to the WESM Ancillary Services Monitoring Manual (ASMM) Issue 1.2 on Additional Conditions for Qualifying a Frequency Driven Event (FDE) (*ORCP-WM-26-03*).

The proposed amendment seeks to amend Section 5.6.2 of the ASMM by introducing an additional condition to determine the termination of an FDE, in view of the following:

- a. Give ample time for the Reserve Facility to normalize its loading near the Unit setpoint, which is the initial reference of the Unit governor in computing the desired response.
- b. Variances from the Reserve Facility's Frequency Reference compared to the System Frequency.
- c. Reduction of multiple Frequency Driven Events occurrences.

BACKGROUND:

The SN Aboitiz Power-Magat, Inc. and SN Aboitiz Power-Benguet, Inc. (collectively, the 'SNAP Group') submitted the proposed amendments on 24 March 2026 as an Urgent Amendment. Upon deliberation during its 257th Regular Meeting, the RCC determined that the proposal did not meet the urgency criteria and subsequently reclassified it as a General Amendment proposal. Consequently, the PEM Board, during its 95th Meeting on 29 April 2026, concurred with the RCC's decision on the said proposal.

DOCUMENTS:

Provided below are relevant materials for your reference and perusal:

- [Original Rules Change Proposal submitted by SNAP Group \(ORCP-WM-26-02\)](#)
- [Presentation of the Proposed Amendment](#)
- [PEM Board-approved \(RCC Resolution No. 2026-03\) per PEM Board Approval on 29 April 2026](#)



- RCC Form 3: 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 **16 June 2026** or 30 working days from the date of publication (04 May 2026). We recommend using Firefox browser for submitting your comments.

Please ensure that your submission is signed securely by the designated approving authority and/or representative of your company, and 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!

Rules Review Division

Market Assessment Group

Philippine Electricity Market Corporation

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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	
Designation	
Company	National Grid Corporation of the Philippines
Company Address	
Telephone No.	
Email Address	

Comments to the Proposed General Amendments to WESM Ancillary Services Monitoring Manual Issue 1.2 on Additional Conditions for Qualifying a Frequency Driven Event (FDE)

Commenter	General Comments	Proponent's Response
NGCP	NGCP would like to note that SNAP's proposed amendment/methodology is not consistent with the System Operator's practice for considering an FDE a valid event for both testing and compliance monitoring.	

WESM ANCILLARY SERVICES MONITORING MANUAL 1.2						
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments
Section 5.6 Measuring Reserve Response Compliance of Generators on	5.6.2.	A <i>reserve facility's</i> response accuracy via GCM shall be calculated as follows.¹² xxx The event will qualify as <i>Frequency-Driven Event</i>, for this purpose, if: a. the event lasts for more than five (5) seconds; and b. the frequency deviation exceeds the deadband setting by 0.02 Hz for conventional generating units and 0.01 Hz for battery energy storage systems. xxx	A <i>reserve facility's</i> response accuracy via GCM shall be calculated as follows.¹² xxx The event will qualify as <i>Frequency-Driven Event</i>, for this purpose, if: a. the event lasts for more than five (5) seconds; and b. the frequency deviation exceeds the deadband setting by 0.02 Hz for conventional generating units and 0.01 Hz for battery energy storage systems; <u>c. the frequency deviation normalizes below the deadband setting by 0.02 Hz for conventional generating units and 0.01 Hz for battery energy storage; and</u>	To provide the Reserve Facilities an additional tolerance with the following considerations: a. Give ample time for the Reserve Facility to normalize its loading near the Unit setpoint, which is the initial reference of the Unit governor in computing the desired response. b. Variances from the Reserve Facility's Frequency Reference compared to the System Frequency	On 5.6.2 d, The proposed FDE termination condition may require further refinement, including consideration of termination upon restoration to the nominal 60 Hz, its applicability to hybrid or fast-responding technologies, and scenarios involving capacity constraints. Supporting studies should be conducted to validate these considerations and to benchmark against practices adopted in other jurisdictions. In addition, the adoption of a fixed 25-second recovery period may have implications on existing	

WESM ANCILLARY SERVICES MONITORING MANUAL 1.2

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments
			<u>d. the frequency deviation normalizes below the threshold for at least 25 seconds.</u> <u>For clarity, item (a) and item (b) determine the start of a FDE, while item (c) and item (d) determine the end of a FDE.</u> xxx	c. Reduction of multiple Frequency Driven Events occurrences The additional provisions aim to combine the evaluation of multiple FDEs, and not exclude any FDE. This ensures that the system frequency has sufficiently recovered before registering a new event. It prevents premature triggering of multiple FDEs caused by short-lived or oscillatory frequency dips around the threshold.	test procedures and should be carefully evaluated.	