From: Philippine Electricity Market Corporation
To: [redacted]
Subject: Comment to Proposal
Date: Monday, 15 June 2026 8:53:41 am
Attachments: PEI & SEDI Comments_Additional Conditions for Qualifying FDE.docx
PEI & SEDI Comments_Additional Conditions for Qualifying FDE.pdf

---

Dear Admin,

You have received a comment to a proposal with the following details:

Proposal Topic:	Additional Conditions for Qualifying a Frequency Driven Event
Organization:	PANASIA ENERGY, INC.
Email:	[redacted]

PHILIPPINE ELECTRICITY MARKET CORPORATION
18F Robinsons Equitable Tower, ADB Avenue, Ortigas Center, Pasig City 1600 Philippines

** This is a system-generated email. Please do not reply. **

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 23 March 2026 as an Urgent Amendment. Upon deliberation during its 256th 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 proposal (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

+632 8631 8734 | mag_rrd@wesm.ph | www.wesm.ph

18F Robinsons Equitable Tower, ADB Avenue, Ortigas Center, Pasig City 1600, Philippines

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	**Antonio O. Mercado** [Signature over Name]
Designation	Tariff and Regulatory Affairs Manager
Company	Panasia Energy Inc. Strategic Energy Development Inc.
Company Address	3204 B East Tower, Tektite Towers
	Exchange Road, Barangay San Antonio
	Pasig City
Telephone No.	[redacted]
Email Address	[redacted]

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

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 *reserve facility's* response accuracy via GCM shall be calculated as follows.[12] xxx The event will qualify as *Frequency-Driven Event*, 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 *reserve facility's* response accuracy via GCM shall be calculated as follows.[12] xxx The event will qualify as *Frequency-Driven Event*, 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~~.~~**;** **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**	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 c. Reduction of multiple Frequency Driven Events occurrences	A Frequency-Driven Event (FDE) is defined as a situation that activates or triggers the need for immediate response from Ancillary Services Providers to maintain the grid stability due to power system frequency variation. Clause 5.6.2 of the Ancillary Services Monitoring Manual specifies the criteria for the qualification of an event as an FDE. While we agree that multiple fragmented FDEs triggered by a single system disturbance should be appropriately addressed, we see no need of redefining the FDE and expanding the qualification criteria for an FDE. Instead, we	A *reserve facility's* response accuracy via GCM shall be calculated as follows.[12] xxx The event will qualify as *Frequency-Driven Event*, 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. **The Frequency-Driven Event and the corresponding provision of reserve service are**

WESM ANCILLARY SERVICES MONITORING MANUAL 1.2						
Title	**Section**	**Provision**	**Proposed Amendment**	**Rationale**	**Comments**	**Proposed Wording based on Comments**
			d. the frequency deviation normalizes below the threshold for at least 25 seconds. **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.** xxx	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.	suggest that the moment when the FDE and the provision of the corresponding reserve service are considered to have ended be clearly established. This moment is described by the proponent in their proposal.	**considered to have ended when (1) the frequency has stabilized within the deadband setting by 0.02 Hz for conventional generating units and 0.01 Hz for battery energy storage; and (2) the frequency has remained within such threshold for at least 25 seconds**. xxx