

## MEETING MINUTES

Subject/Purpose : 193<sup>rd</sup> Rules Change Committee (Special) Meeting  
 Date & Time : 25 March 2022, 09:00 AM  
 Venue : Online via Microsoft Teams  
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### ATTENDEES

	Name	Designation/Position	Department/ Company
1	Concepcion I. Tanglao	Chairperson, Independent	RCC
2	Jesusito G. Morillos	Member, Independent	RCC
3	Fernando Martin Y. Roxas	Member, Independent	RCC
4	Jose Roderick F. Fernando	Member, Independent	RCC
5	Dixie Anthony R. Banzon	Member, Generation Sector	RCC
6	Angeli A. Parcia	Member (Alternate), Generation Sector	RCC
7	Carlito C. Claudio	Member, Generation Sector	RCC
8	Jessie Victorio	Member (Alternate), Generation Sector	RCC
9	Mark D. Habana	Member, Generation Sector	RCC
10	Ryan S. Morales	Member, Distribution Sector	RCC
11	Manuel Luis N. Zagala	Member (Alternate), Distribution Sector	RCC
12	Nelson M. Dela Cruz	Member, Distribution Sector	RCC
13	Virgilio C. Fortich, Jr.	Member, Distribution Sector	RCC
14	Ricardo G. Gumalal	Member, Distribution Sector	RCC
15	Lorreto H. Rivera	Member, Supply Sector	RCC
16	Ambrocio R. Rosales	Member, System Operator	RCC
17	Isidro E. Cacho, Jr.	Member, Market Operator	RCC
18	John Mark S. Catriz	RCC Secretariat	PEMC
19	Karen A. Varquez	RCC Secretariat	PEMC
20	Divine Gayle C. Cruz	RCC Secretariat	PEMC
21	Dianne L. De Guzman	RCC Secretariat	PEMC
22	Kathleen R. Estigoy	RCC Secretariat	PEMC
23	Elvin Hayes E. Nidea	Chief Governance Officer	PEMC
24	Jayson G. Corpuz	Observer	ERC
25	Clares Loren C. Jalocon	TC Secretariat	PEMC
26	Kevin John Y. Dela Cuesta	TC Secretariat	PEMC
27	Aldrin W. Reyes	TC Secretariat	PEMC
28	Lilibeth Grace Vetus	Proponent	IEMOP
29	Jenny I. Jalandoni	Proponent	IEMOP
30	Sheryll M. Dy	Proponent	IEMOP
31	Katrina A. Garcia-Amuyot	Proponent	IEMOP
32	Karen Anne H. Siruma	Proponent	IEMOP
33	Ruziel Larmae T. Gimpaya	Proponent	IEMOP
34	Bryan Albert Castro	Commenter	Aboitiz Power Corp.
35	Lee Ann De Leon	Commenter	Aboitiz Power Corp.
36	Chem Loyola	Commenter	Aboitiz Power Corp.

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	Name	Designation/Position	Department/ Company
37	Rhovel Flores	Commenter	Aboitiz Power Corp.
38	Jayson Francisco	Commenter	Aboitiz Power Corp.
39	Katherine Miranda	Commenter	Aboitiz Power Corp.
40	Glynn Gayman	Commenter	Aboitiz Power Corp.
41	Ana Reduta	Commenter	Aboitiz Power Corp.
42	Gian Karla Gutierrez	Commenter	First Gen Corp.
43	Sahcel C. Estoperes	Commenter	MERALCO
44	Genevee A. Rellores	Commenter	MERALCO
45	Roma Angela P. Hofilena	Commenter	MERALCO
46	Julius M. Evangelista	Commenter	MERALCO
47	Ma. Elisha S. Eloriaga	Commenter	MERALCO
48	Charleen Anne R. Corsiga	Commenter	MERALCO
49	Neil Martin E. Modina	Commenter	NGCP
50	Leo E. Bugarin	Commenter	NGCP
51	June C. Pascual	Commenter	NGCP

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I. Call to Order	<p>a. The meeting was conducted via Microsoft Teams and was called to order at 9:02 AM.</p> <p>b. The meeting was presided by Ms. Concepcion I. Tanglao (Chairperson/Independent).</p>
II. Determination of Quorum	All principal members and 3 alternate member were present.
III. Adoption of Agenda	The agenda was approved, as presented.
IV. Approval of Minutes of Previous Meeting - 190 <sup>th</sup> Special Meeting, 08 February 2022	<p>Mr. Ambrocio R. Rosales (SO) provided revisions to the minutes clarifying his statement regarding the effect of designating hydropower plants as Must Run Unit (MRU), to read as follows:</p> <p><i>“Mr. Rosales opined that the proposal would most likely apply to all hydropower plants and should not only be limited to Caliraya Dam or certain generators. While he took note of Caliraya’s maximum holding capacity which is relatively small, he reiterated that if the proposal will be allowed, it could compromise the grid’s security and reliability since other plants would be dispatched at minimum operation or even on shutdown mode (as part of the contingency plan) while all hydro generators would be at maximum dispatch due to dam elevation concerns. He noted that he understands the concern of NPC regarding the spillage of water to the community, but this can be addressed through other means, such as decreasing the pumping if the approaching typhoon will directly hit the dam or requesting for a maximum dispatch subject to the approval of the System Operator.”</i></p> <p>Having no further revisions, Mr. Rosales moved for the approval of the minutes, which was duly seconded by Ms. Loretto H. Rivera (Supply) and was adopted by the body.</p>
V. Matters Arising from Previous Meeting	
5.1 Proposed Amendments on Implementation of the Green Energy Option Program (ORCP-WR-RR-WM-RM-22-02)  a) Presentation of GEOP Concepts/Background	<p><u>Presenter:</u> IEMOP (Proponent) as represented by Ms. Karen Anne H. Siruma</p> <p><u>Action Requested:</u> For discussion and approval to endorse to the PEM Board</p> <p><u>Material/s:</u> Annex A – Overview of the RCOA and GEOP</p>

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Market Corporation

Agenda	Agreements / Action Taken / Action Required
	<p>Annex B – Summary of GEOP Implementation Assessment            Annex C – Matrix of Proposed Amendments with Comments and Responses</p> <p><u>Proceedings:</u></p> <p><b><i>On the Presentation of GEOP Concepts/Background</i></b></p> <ul style="list-style-type: none"> <li>Ms. Karen Anne H. Siruma (IEMOP) discussed the background of the Green Energy Option Program (GEOP). Below are the highlights of the discussion:               <ul style="list-style-type: none"> <li>The Renewable Energy (RE) Law or Republic Act 9513 mandated the establishment of GEOP in 2008. The DOE issued DOE Department Circular (DC) 2018-07-0019 or the Guidelines for the establishment of GEOP and DOE DC 2020-04-0009 in 2018 and 2020, respectively. In 2021, the ERC issued Resolution No. 08, Series of 2021 detailing the rules for implementation of the GEOP.</li> <li>GEOP is conceptually like Retail Competition and Open Access (RCOA), wherein both are mechanisms to empower end-users to choose its energy supply/supplier. However, the GEOP end-users have the sole option of being supplied with renewable energy (RE) in meeting their energy requirements by the Retail Energy Supplier (RES), which will contract the energy from the RE Generation Companies.</li> <li>Traditionally, both the distribution and supply of electricity is covered by the Distribution Utility, which serves captive customers that have an average peak demand of not more than 500kW. With the RCOA, the supply and distribution are unbundled, supply being delivered by the Retail Electricity Supplier to the contestable customers which have an average peak demand of <math>\geq 500</math> kW. In RCOA, there is no distinction as to the source of energy supplied, whether renewable or conventional. With the GEOP, a new entity called Renewable Energy Supplier is created which will serve both the contestable customers of the RCOA and the end-users which have an average peak demand of 100kW-499kW. The energy supply should only come from an RE generation.</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>- Upon the inquiry of Mr. Rosales and Chairperson Tanglao, it was clarified by Ms. Siruma that the minimum average peak demand for a customer to be eligible as GEOP End-User is 100kW. Therefore, contestable customers can also be an end-user since the minimum average peak demand for contestability is <math>\geq 500</math> kW.</li> <li>- Mr. Rosales asked how to ensure the 100% supply of RE to end-user considering the intermittent characteristic of RE supply, which affects its availability for generation. In response, Ms. Siruma stated that IEMOP has a proposed amendment that will oblige the contracting parties to have a bilateral contract quantity (BCQ) which will cover entirely (100%) its RE supply obligation to the end-user. With this, the generator should not have a spot exposure. This proposal will require system enhancements.</li> <li>- Ms. Rivera inquired if the 100% RE supply to end-user is a hard and fast rule and if there is an option for the end-user to be supplied by both the RE Supplier and the Retail Electricity Supplier. Ms. Siruma answered that the 100% RE supply sourcing is mandated by the ERC GEOP Rules. Under the DOE issuance, the RE Suppliers are responsible in ensuring that their replacement power are sourced also from RE, which shall be monitored by the DOE by checking the operating permit.</li> <li>- Mr. Carlito C. Claudio (Generation) noted that RE generation may not be available 24/7 due to forced outage or preventive maintenance. He explained that geothermal energy and biomass energy are the sources that can provide a continuous 100% renewable energy supply. The RE Supplier can, therefore, only have a replacement power contracts with geothermal and biomass energy generators. With this, he asked if the submission of replacement power contract between the RE Supplier and the end-user will be required by IEMOP, to which Ms. Siruma replied that IEMOP will only require the copy of the contract in accordance with the ERC Rules. To validate replacement power, it is proposed that the enrolled contracting party in the registration should only be an RE generator. It is currently</li> </ul>

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	<p>implemented through the submission of attestation. The proposal is contingent to system enhancements.</p> <p>Ms. Angeli A. Parcia (Generation) noted that the ERC GEOP Rules require that the RE supplier should submit a report quarterly containing the KW sales per technology that they have. This will also validate the RE supplies to end-user.</p> <ul style="list-style-type: none"> <li>- Mr. Rosales suggested requiring the RE generators to have forecast of their capacity daily considering that the RE resources are realistically not available 24/7.</li> <li>- From the distribution perspective, Mr. Ricardo G. Gumalal (Distribution) inquired if there would be a possibility that the GEOP End-User's supply will be disconnected should there be a low supply of RE considering the physical distribution network. Ms. Siruma explained that the distribution and supply are different, and that RE supply and the conventional energy supply can be segregated in the billing and settlement.</li> <li>- Mr. Ryan S. Morales (Distribution) requested for confirmation if his understanding is correct that the GEOP is a commercial transaction, such that as long as the BCQ is declared concerning an RE generator counterparty, the transaction is considered as for green energy supply. He also asked, as a matter of commercial strategy, if it is possible to contract a certain percentage from the RE generator and a certain percentage from a conventional generator to supply a GEOP End-User as long as it matches with the capacity stated in the RE certificate.</li> </ul> <p>Mr. Jayson G. Corpuz (ERC) enumerated the ways to police the assurance that 100% of the replacement power will come from RE resource, as follows: (1) RE supplier should secure a RES license and in the application, it is required to indicate the replacement power as part of its commercial plan; (2) Contracting party for replacement power should be indicated in their GEOP contract under the replacement power provision; (3) The Central Registration Body (CRB) has a proposed system enhancements in the CRSS that will enable validation of RE supply. He also added that it is the intent of</p>

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	<p>the GEOP Rules for the RE Supplier to have a due diligence in sourcing its energy from the RE generator.</p> <ul style="list-style-type: none"> <li>- Mr. Mark D. Habana (Generation) asked if a simulation or a study was conducted regarding the impact of prices of GEOP implementation to customers considering that RE supply is very limited which could possibly lead to a higher electricity bill. In response, Mr. Corpuz said that there was no study or simulation conducted on the price impact because GEOP is basically a choice of the customer to be supplied with green electricity. He said that the Retail Electricity Supplier has an average rate of Php 3.87/kWh, which is competitive with other technologies. Chairperson Tanglao asked if the impact of GEOP prices will only be to GEOP End-user, to which Mr. Corpuz confirmed and explained that GEOP participation is on a voluntary basis.</li> <li>- Mr. Fernando Martin Y. Roxas (Independent) noted that one of the objectives of GEOP is to encourage investors to finance the capacity building of RE generation as the demand increases, which will be enabled by the WESM Rules and Market Manuals.</li> </ul> <p><b><i>On the GEOP Assessment</i></b></p> <ul style="list-style-type: none"> <li>• Ms. Divine Gayle C. Cruz (RCC Secretariat) presented the summary of MAG's Assessment Report on Urgent Amendments regarding GEOP Implementation, with highlights of the discussion as follows:             <ul style="list-style-type: none"> <li>- For the budget application for system enhancements, Mr. Corpuz clarified that IEMOP needs to submit its request via a formal petition before the ERC to which Ms. Lilibeth Grace Vitus (IEMOP) acknowledged. Mr. Corpuz stated that it will take around six (6) months for the ERC to issue a decision on the budget application.</li> <li>- For the timeline to enhance the relevant CRB System, Mr. Isidro E. Cacho, Jr. (MO) explained that the system enhancements will be dependent upon the rules that will be approved. The requirements of the rules will also dictate the budget needed. Hence, IEMOP will only be able to</li> </ul> </li> </ul>



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	<p>determine the estimated budget and the timeline for enhancement after the approval of the rules.</p> <ul style="list-style-type: none"> <li>- Mr. Corpuz noted that IEMOP previously manifested during their December 2021 meeting that it can process 400 switching requests per switch date even without the required system enhancements. Ms. Vitus, however, clarified that their previous statement is qualified by provision for additional manpower for the CRB and system enhancements. The switch request figure that can be processed by the CRB is an improvement from the usual 26 customers per switch date. Mr. Corpuz requested IEMOP to reconfirm this information since it was earlier manifested that the said figure is for the initial stage of the GEOP.</li> <li>- Ms. Cruz noted that harmonizing GEOP procedures with procedures already in place in the Retail Market may be looked at for easier compliance of GEOP participants and implementation by the CRB. She, however, noted also that the timelines in the approved urgent amendment was in faithful compliance with the ERC GEOP Rules.</li> <li>- Upon the inquiry of Mr. Virgilio C. Fortich, Jr. (Distribution), Ms. Katrina Garcia-Amuyot (IEMOP) clarified that they are not requiring a Certificate of Authority from ERC for the registration of Retail MSP. They are instead requiring the following (1) Application form for MSP; (2) Notarized Market Participation Agreement (MPA) as applicable for RCOA, GEOP, or both; and (3) Certificate of Authority for the authorized signatory.</li> </ul> <p><b><i>On Request for Extension of PEM Board-Approved Urgent Amendment on GEOP Proposal</i></b></p> <ul style="list-style-type: none"> <li>• Ms. Kathleen R. Estigoy (RCC Secretariat) informed the RCC that the Urgent Amendments regarding GEOP Implementation, which became effective on 25 November 2021 will expire by 25 May 2022. In accordance with Section 7.4 (g) of the Rules Change Manual, the PEM Board may extend the effectivity of urgent amendments only once for up to six (6) months.</li> </ul>





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	<ul style="list-style-type: none"> <li>The Secretariat noted that the RCC may avail of the extension provided for under the Rules Change Manual for continuity of GEOP implementation, in consideration of the following:           <ol style="list-style-type: none"> <li>(1) Timeline for applying for budget allocation to enhance IEMOP's systems and the timeline for system enhancements itself;</li> <li>(2) DOE's process for approving the general amendments; and</li> <li>(3) Approaching expiry of the PEM Board approval on urgent amendments to implement the GEOP.</li> </ol> </li> </ul> <p><u>Agreement:</u></p> <p>Having no further questions, Mr. Cacho, Jr. moved that the RCC request for an extension of the effectivity of urgent amendments regarding GEOP for another six (6) months, which was duly seconded by Ms. Rivera and was adopted by the body.</p> <p>The Secretariat will prepare the draft RCC resolution for the RCC's review and approval in the next regular meeting.</p> <p><b><i>On Deliberation of Comments and Proponent's Response</i></b></p> <p>Ms. Siruma discussed the matrix providing details of the proposal and comments received along with the corresponding responses from the proponent. Below are the highlights/agreements:</p> <ul style="list-style-type: none"> <li>IEMOP will check on the relevant rules and manuals that needs further amendment considering the BIR Ruling and system enhancements.</li> <li>IEMOP's intention is to include a definition for "Retail Customer" that will both include the contestable customer and GEOP End-User and they agreed to the proposed definition of MERALCO.</li> <li>The WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures needs to be amended for the Directly Connected Customers (DCCs) to register in the WESM as Indirect WESM Members to manage spot exposure, if they wish to participate in the GEOP pursuant to Section 3 of ERC GEOP Rules. The DCCs should buy its RE supply from</li> </ul>

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	<p>the Renewable Energy Supplier. This was not included in the urgent amendment.</p> <ul style="list-style-type: none"> <li>• In response to WESM-Technical Committee's (TC) query, IEMOP confirmed that suspended WESM member's registration is tagged as "suspended" in the registry list.</li> <li>• Notification to the affected parties by the Market Operator regarding re-submission of bilateral contract declarations is contingent upon the enhancements to the Central Registration Settlement System.</li> <li>• IEMOP, MERALCO, and other interested parties (retail and distribution sectors) will conduct a coordination meeting to further discuss the implementation details of the proposed amendments on the implementation of GEOP. MERALCO shall initiate the conduct of the meeting and report to the RCC the output of the meeting. Among the matters to be discussed are the harmonization of separate reports that contain the same information, and notification to the Supplier within working hours regarding the status of submitted documents for switch requests.</li> <li>• Revise "Other End-Users" to "GEOP End-User".</li> <li>• Include in the applicable retail manual the details of the eligibility requirements for contestable customers and GEOP End-User, not in the Retail Rules.</li> <li>• With the variance of data/report required to be submitted by ERC and DOE regarding qualified customers for GEOP and RCOA, it was clarified that confirmation regarding the eligibility of an end-user need not be done by submitting another report but by properly ticking the applicable box in the google form from IEMOP.</li> <li>• Cessation of membership of Retail Customers that are registered with the CRB shall be governed by the Retail Manual on Registration, Suspension and De-Registration Criteria and Procedures. This was not included in the urgent amendment.</li> </ul>

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	<ul style="list-style-type: none"> <li>It was clarified by IEMOP that it is the RE Supplier to submit switch request. For end-user that has multiple RE Supplier, the end-user shall nominate its primary RE Supplier.</li> <li>Transitory provision will be inserted for proposed amendments which require software enhancements.</li> </ul> <p><u>Agreement:</u></p> <ul style="list-style-type: none"> <li>The RCC approved the proposal for endorsement to the PEM Board, as revised, subject to finalization of the matrix.</li> </ul>
VI. Schedule of Next Meetings	<p><u>Presenter:</u> Ms. Kathleen R. Estigoy (Secretariat)</p> <p><u>Action Requested:</u> For information</p> <p>The RCC noted the following schedules:</p> <ul style="list-style-type: none"> <li>RCC Meetings               <ul style="list-style-type: none"> <li>22 April 2022</li> <li>20 May 2022</li> <li>17 June 2022</li> </ul> </li> <li>PEM Board Meeting               <ul style="list-style-type: none"> <li>30 March 2022</li> </ul> </li> <li>The RCC agreed to have a Special Meeting for the continuation of deliberation of comments on the GEOP Proposal. It will be scheduled after the coordination meeting between PEMC-ERC and IEMOP-MERALCO.</li> </ul>
VII. Adjournment	<p>Having no further agenda, Mr. Fortich, Jr. moved to adjourn the meeting which was duly seconded by Mr. Gumalal and was adopted by the body. The meeting was adjourned at 03:06 PM.</p>

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Prepared by:

KATHLEEN R. ESTIGOY  
Specialist, Rules Review Division  
Market Assessment Group

Reviewed by:

KAREN A. VARQUEZ  
Manager, Rules Review Division  
Market Assessment Group

Noted by:

JOHN MARK S. CATRIZ  
Head, Market Assessment Group

Approved by:

CONCEPCION I. TANGLAO  
Chairman, Independent

JESUSITO G. MORALLOS  
Member, Independent

FERNANDO MARTIN Y. ROXAS  
Member, Independent

JOSE RODERICK F. FERNANDO  
Member, Independent

DIXIE ANTHONY R. BANZON  
Member, Generation Sector  
Masinloc Power Partners Co. Ltd. (MPPCL)

CHERRY A. JAVIER  
Member, Generation Sector  
Aboitiz Power Corp. (APC)

CARLITO C. CLAUDIO  
Member, Generation Sector  
Millennium Energy, Inc. / Panasia Energy, Inc.  
(MEI/PEI)

MARK D. HABANA  
Member, Generation Sector  
Vivant Corporation – Philippines (Vivant)

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A blue ink signature of Ryan S. Morales, written in a cursive style.

RYAN S. MORALES  
Member, Distribution Sector  
Manila Electric Company (MERALCO)

A black ink signature of Virgilio C. Fortich, Jr., written in a cursive style.

VIRGILIO C. FORTICH, JR.  
Member, Distribution Sector  
Cebu III Electric Cooperative, Inc. (CEBECO III)

A black ink signature of Ricardo G. Gumalal, written in a cursive style.

RICARDO G. GUMALAL  
Member, Distribution Sector  
Iligan Light and Power, Inc. (ILPI)

A black ink signature of Nelson M. Dela Cruz, written in a cursive style.

NELSON M. DELA CRUZ  
Member, Distribution Sector  
Nueva Ecija II Area 1 Electric Cooperative, Inc.  
(NEECO II – Area I)

A black ink signature of Lorreto H. Rivera, written in a cursive style.

LORRETO H. RIVERA  
Member, Supply Sector  
TeaM (Philippines) Energy Corporation (TPEC)

A blue ink signature of Isidro E. Cachó, Jr., written in a cursive style.

ISIDRO E. CACHO, JR.  
Member, Market Operator  
Independent Electricity Market Operator of the  
Philippines (IEMOP)

A black ink signature of Ambrocio R. Rosales, written in a cursive style.

AMBROCIO R. ROSALES  
Member, System Operator  
National Grid Corporation of the Philippines  
(NGCP)

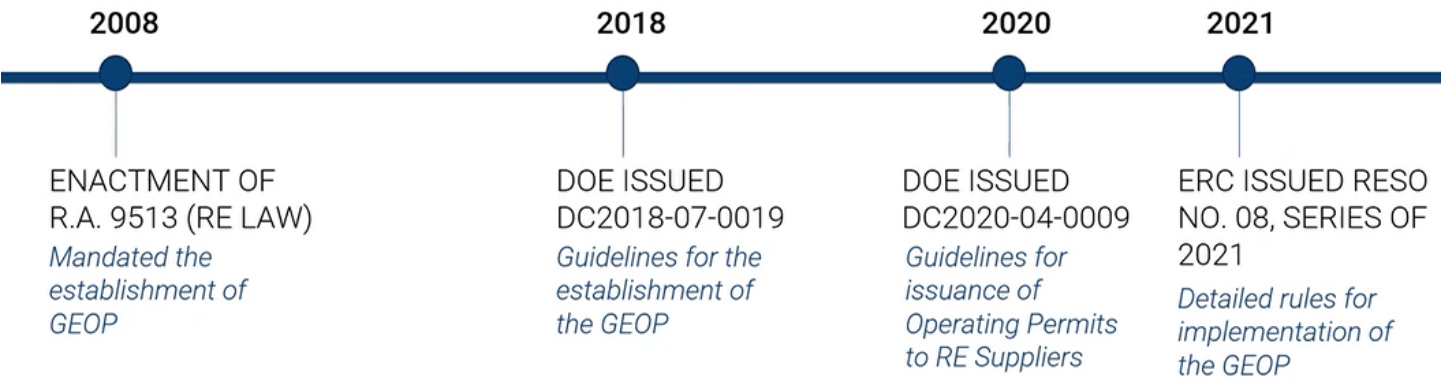
# OVERVIEW OF THE GREEN ENERGY OPTION PROGRAM

MAR 2022 | PRESENTATION TO RCC



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## BACKGROUND



3

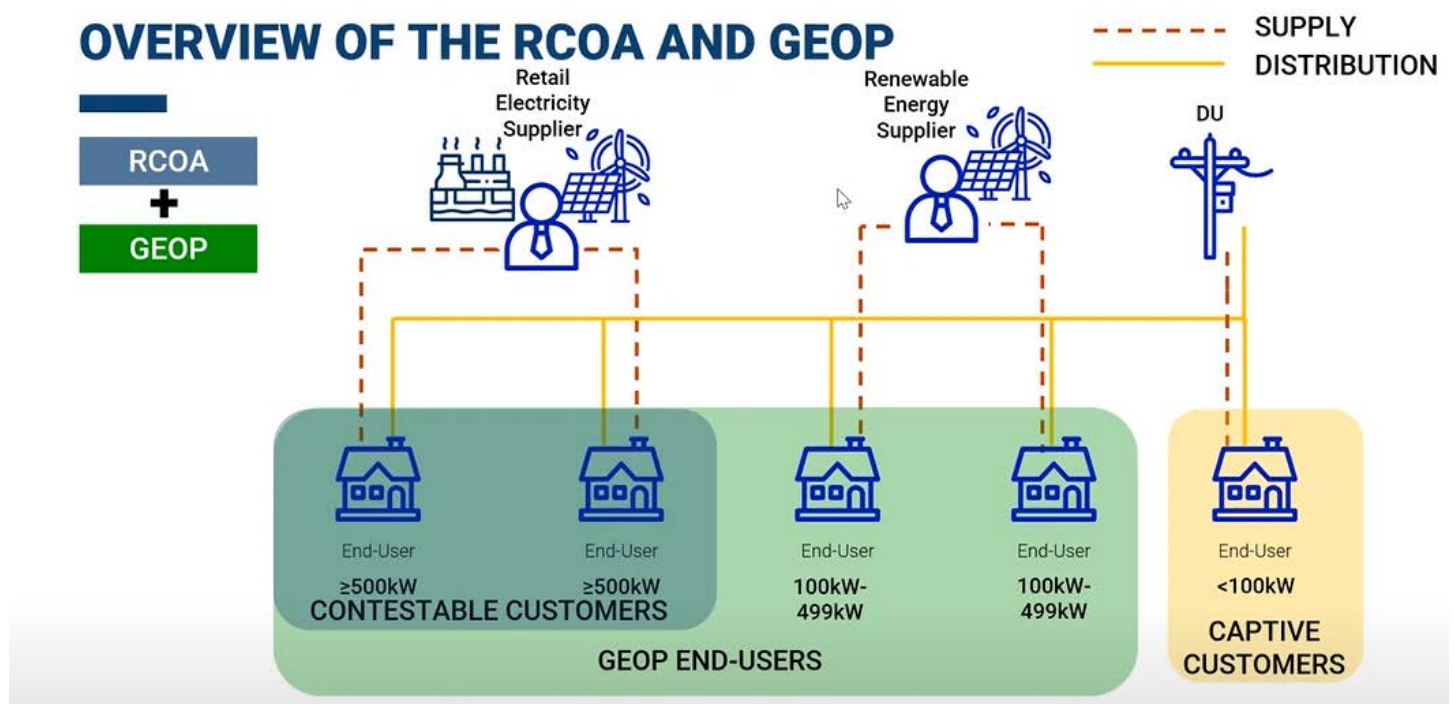
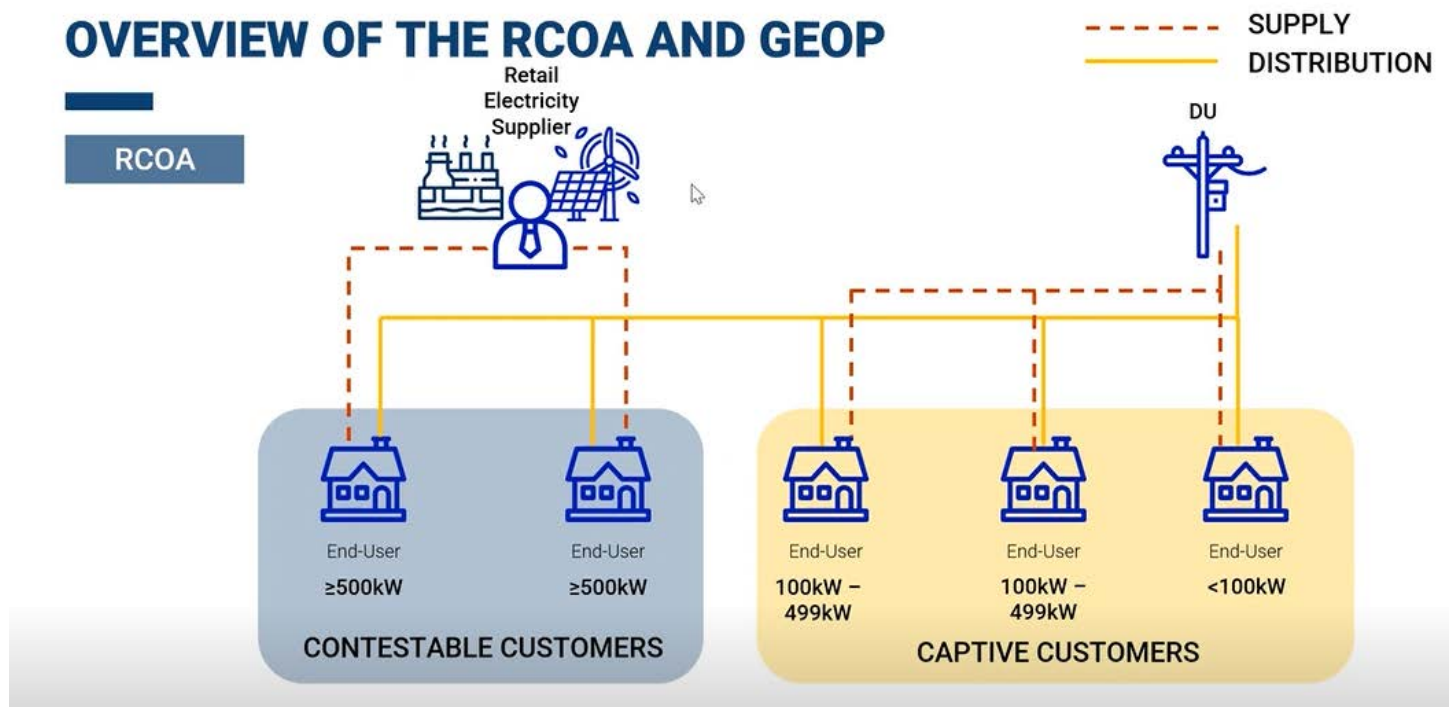
## GREEN ENERGY OPTION PROGRAM (GEOP)

- Mechanism to empower end-users to choose renewable energy in meeting their energy requirements
- Conceptually similar to RCOA





## ANNEX A – Overview of the RCOA and GEOP







**BACKGROUND**  
Urgent Amendments on GEOP

Activity	Dates
RCC Approval	RCC Resolution No. 2021-20 dated 19 November 2021
PEM Board Approval	PEM Board Resolution No. 2021-42-07 dated 24 November 2021
Effectivity Date of Urgent Amendments	25 November 2021
GEOP Launch	03 December 2021

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**SUMMARY OF ASSESSMENT**  
Registration

- As of 25 March 2022:

Participants	Registered
GEOP End-User	17
Renewable Energy (RE) Supplier	14
GEOP Metering Services Provider	7*
GEOP Supplier of Last Resort	5*
Total	43

*\*Already registered in the Retail Market*

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ANNEX B – Summary of GEOP Implementation Assessment

SUMMARY OF ASSESSMENT  
Customer Transfer

- Customer Transfer covers the following activities:
  - 1) GEOP End-User switches between RE Suppliers, or from RE Supplier to a Distribution Utility (DU),
  - 2) GEOP End-User relocates within and outside its DU's franchise area,
  - 3) GEOP supply contract is terminated, and
  - 4) GEOP End-User transfers to a SOLR
  - 5) RE Supplier disconnects or reconnects a GEOP End-User
- As of 25 March 2022: no recorded instance of customer transfer activities.

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SUMMARY OF ASSESSMENT  
Metering

- All seven (7) registered GEOP MSPs are previously registered in the Retail Market.

MSP	2021 Rating*
Manila Electric Company (MRLCOMSP)	89.22%
Mactan Enerzone Corporation (MEZMSP)	88.74%
Tarlac Electric, Inc. (TEISMP)	85.22%
Visayan Electric Company (VECOMSP)	87.08%
Lima Enerzone Corporation (LEZMSP)	81.57%
Tarlac II Electric Cooperative, Inc. (TRLCO2MSP)	82.31%
Cebu III Electric Cooperative, Inc. (CEBEC3MSP)	--

\*Excludes customer satisfaction rating  
Passing rate is 85%

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SUMMARY OF ASSESSMENT  
Settlement

- Registration of 17 GEOP End-Users shall take effect on 26 March 2022.
- To date, no metered quantities are recorded.

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ANNEX B – Summary of GEOP Implementation Assessment

**SUMMARY OF ASSESSMENT**  
Implementation Concerns

- 1) Requires system enhancements to the Central Registration and Settlement System for full and efficient implementation.
- 2) Requires additional manpower for the Central Registration Body (CRB).
- 3) There is difficulty on the part of prospective GEOP participants in complying with some requirements.
- 4) Harmonizing GEOP procedures with procedures already in place in the Retail Market may be looked at for easier compliance of GEOP participants and implementation by the CRB.

ANNEX C – Matrix of Proposed Amendments with Comments and Responses

A. WESM Rules

WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
					<p><u>PEMC:</u> <b>A.</b> How and when will the BIR Ruling dated 24 Aug 2021 be implemented in the GEOP, specifically under Value-Added Tax, Item 7:</p> <p><i>“The electricity purchased by Renewable Energy (RE) Developers through WESM, if any, that is subsequently sold in WESM shall be generally subject to VAT.”</i></p> <p>Please cite if it will entail software enhancement and related cost or if it will require corresponding amendments to market rules and manuals.</p>		<p><u>Response to PEMC:</u> A. The BIR Ruling was implemented starting 1 January 2022 and will apply as well to GEOP transactions through the WESM. It will be applied in the same manner as how other WESM transactions are treated and will therefore use the same software/systems .</p> <p>Subject to further clarifications from IEMOP process owners during RCC meeting.</p>	<p>No action needed from RCC.</p> <p>IEMOP will: (1) review the market rules/manuals for possible amendments; and (2) check if corresponding rules changes are required for the enhancements made on the CRSS relative to the BIR Ruling.</p>

ANNEX C – Matrix of Proposed Amendments with Comments and Responses

WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
					<p><b>B.</b> PEMC respectfully recommends extending the effectivity of the PEM Board-Approved Market Rules and Manuals on GEOP for another six (6) months considering the timeline for processing general amendments.</p> <p><b>TC:</b> There should be a consistency check among relevant Rules and Manuals especially on terminologies and definitions to keep track of the changes and updates.</p>		<p>B. Agree on this recommendation</p> <p><b>Response to TC:</b> We agree on this recommendation and defer to RCC for harmonization of terminologies.</p>	
Market Trading Nodes	3.2.2.7	3.2.2.7 A <i>Supplier</i> shall be designated a <i>market trading node</i> at each <i>market trading node</i> of <i>its grid off-take metering points</i> where it is supplying a <i>Contestable</i>	3.2.2.7 A <i>Supplier</i> shall be designated a <i>market trading node</i> at each <i>market trading node</i> of <i>its grid off-take metering points</i> where it is supplying a <del><i>Contestable</i></del>	Generalized the term to Retail Customer to incorporate all entities allowed by the ERC to choose a	<p><b>MERALCO:</b> We note that the introduced term “Retail Customer” is defined to encompass both Contestable Customer and GEOP</p>		<p><b>Response to MERALCO:</b> We agree with MERALCO's recommended changes to the definition of the</p>	Adopted MERALCO's changes to the term Retail Customer.

ANNEX C – Matrix of Proposed Amendments with Comments and Responses

WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
		<i>Customer</i> that is not registered in the <i>WESM</i> .	<b><u>Retail</u></b> <i>Customer</i> that is not registered in the <i>WESM</i> .	Supplier. This term is proposed to be defined under the WESM Rules Glossary.	End-User. May we be clarified as to how the succeeding provisions which refer to “Retail Customer” will clearly distinguish as only applying to either GEOP End-User or Contestable Customer, as applicable to such provision (e.g. GEOP End-User is defined in the GEOP Rules as required to source from 100% Renewable Energy, while a Contestable Customer can have a combination of conventional, renewable and market resources.) Further, we understand that the intention of defining “Retail Customer” to include both Contestable Customers and GEOP End-users is to avoid repetition of provisions pertaining to		term Retail Customer in the Glossary.	

ANNEX C – Matrix of Proposed Amendments with Comments and Responses

WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
					processes and/or requirements that may be applicable to both. However, we note that there are also processes and/or requirements that are <b><u>specific and/or exclusive</u></b> to Contestable Customers and GEOP End-users. Given this, it should be made clear in the definition of “Retail Customer” that the term can either refer to Contestable Customers and GEOP End-users collectively or Contestable Customers or GEOP End-users individually.			
Defining the Gross Energy Settlement Quantity for Market Trading Nodes	3.13.6	For each <i>dispatch interval</i> , the <i>gross energy settlement quantity</i> for each <i>market trading node</i> shall be determined by the <i>Market Operator</i> as follows: xxx	For each <i>dispatch interval</i> , the <i>gross energy settlement quantity</i> for each <i>market trading node</i> shall be determined by the <i>Market Operator</i> as follows: xxx	Propose to delete the determination of the GESQ for DUs since it is already covered under WESM Rules Clause 3.13.6 (f). This provision refers to	<b>MERALCO:</b> There could be instances when a DU-connected GEOP customer can also be WESM-registered; hence, should be revised to Retail Customer to include	<b>MERALCO:</b> <b>(d)</b> If the <i>market trading node</i> is designated to a <i>WESM-registered GG</i> <del><i>Contestable Retail</i></del> <b><i>Customer</i></b> directly connected to a <i>distribution system</i> or	<b>Response to MERALCO:</b> There is no mention of WESM registration for GEOP End-users in DOE and ERC issuances on	Adopted IEMOP's proposal.



ANNEX C – Matrix of Proposed Amendments with Comments and Responses

WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
		(d) The gross energy settlement quantity of a market trading node of a Customer who is a Distribution Utility with a contestable customer connected to its distribution system shall be determined in accordance with Retail Rules Clause 3.3.3.3. (e) If the market trading node is designated to a WESM-registered CC directly connected to a distribution system or a Supplier, the gross energy settlement quantity for the market trading node shall be determined in accordance with Retail Rules Clause 3.3.3.1. (Added per DOE DC No. 2021-06-0012 dated 03 June 2021) xxx	<del>(d) The gross energy settlement quantity of a market trading node of a Customer who is a Distribution Utility with a contestable customer connected to its distribution system shall be determined in accordance with Retail Rules Clause 3.3.3.3.</del> (e) <b>(d)</b> If the market trading node is designated to a WESM-registered <del>CC</del> <b>Contestable Customer</b> directly connected to a distribution system or a Supplier, the gross energy settlement quantity for the market trading node shall be determined in accordance with Retail Rules Clause 3.3.3.1. (f) <b>(e)</b> xxx (g) <b>(f)</b> xxx (h) <b>(g)</b> xxx	a Retail Rules Clause that is already deleted in DOE DC 2021-06-0012  Clerical revision and re-numbering.	both Contestable Customers and GEOP Customers.	a Supplier, the gross energy settlement quantity for the market trading node shall be determined in accordance with Retail Rules Clause 3.3.3.1.	GEOP. Given that GEOP End-Users are required to source 100% of their electricity requirements from RE sources, we deem that registration in the WESM is not applicable to GEOP End-Users. As provided in latter sections, we propose that only GEOP End-Users that are directly connected to the transmission system should be registered in the WESM but as indirect WESM members to avoid situations where they will be exposed to the spot market.	

ANNEX C – Matrix of Proposed Amendments with Comments and Responses

WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
METERING – APPLICATION OF CHAPTER	4.2	This Chapter 4 does not apply to <i>contestable customers</i> directly connected to <i>distribution systems</i> . Obligations, requirements, and procedures related to the metering of <i>contestable customers</i> directly connected to <i>distribution systems</i> are provided under Section 4 of the <i>Retail Rules</i> .	This Chapter 4 does not apply to <del><i>contestable customers</i></del> <b><u>Retail Customers</u></b> directly connected to <i>distribution systems</i> . Obligations, requirements, and procedures related to the metering of <del><i>contestable customers</i></del> <b><u>Retail Customers</u></b> directly connected to <i>distribution systems</i> are provided under Section 4 of the <i>Retail Rules</i> .	Generalized the term to Retail Customer to cover GEOP End-Users.				Approved
GLOSSARY	Chapter 11	(new)	<b><u>Green Energy Option Program – The mechanism to empower end-users to choose renewable energy in meeting their energy requirements pursuant to Republic Act No. 9513.</u></b>	Defined the GEOP in line with R.A. 9513				Approved

ANNEX C – Matrix of Proposed Amendments with Comments and Responses

WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
GLOSSAR Y	Chapter 11	<b>Grid Off-take Metering Point-</b> Metering point at a grid at which the settlement quantity of a Contestable Customer connected to a distribution system shall be determined.	<b>Grid Off-take Metering Point-</b> Metering point at a grid at which the settlement quantity of a <del>Contestable Customer</del> <b><u>Retail Customer</u></b> connected to a distribution system shall be determined.	Generalized the term to Retail Customer to cover GEOP End-Users.				Approved
GLOSSAR Y	Chapter 11	<b>Retail Rules.</b> The Rules promulgated by the DOE governing the integration of retail competition in the operations and governance processes of the WESM and the management of the transactions of Suppliers and Contestable Customers in the WESM, and the operations of the Central Registration Body.	<b>Retail Rules.</b> The Rules promulgated by the DOE governing the integration of retail competition in the operations and governance processes of the WESM and the management of the transactions of Suppliers and <del>Contestable</del> <b><u>Retail</u></b> Customers in the WESM, and the operations of the Central Registration Body.	Generalized the term to Retail Customer to cover GEOP End-Users.	<b>IEMOP:</b> Propose to further expand definition of Retail Rules to cover the GEOP	<b>IEMOP:</b> <b>Retail Rules.</b> The Rules promulgated by the DOE governing the integration of <b><u>Retail Competition and Open Access and the Green Energy Option Program</u></b> in the operations and governance processes of the WESM and the management of the transactions of Suppliers and <i>Retail Customers</i> in the WESM, and the operations of the Central Registration Body.		Adopted IEMOP's revision.

ANNEX C – Matrix of Proposed Amendments with Comments and Responses

WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
GLOSSAR Y	Chapter 11	(new)	<u><b>Retail Customer – An electricity end-user that is qualified to contract electricity supply from Suppliers, in accordance with qualifications issued by the ERC. For avoidance of doubt, this shall refer to Contestable Customers as prescribed in the Act and/or other End-Users allowed to participate under the Rules on Green Energy Option Program or other relevant rules issued by the ERC.</b></u>	Introduced the term Retail Customers to generalize End-Users that are Contestable Customers and those End-users under the Green Energy Option Program.	<b>MERALCO:</b> As mentioned in the proposed definition of Retail Customer, this will also refer to “other End-Users” allowed to participate under “other relevant rules issued by the ERC”. Given this, are we foreseeing other types of customers aside from Contestable Customers and GEOP End-Users that will fall under this definition? If none, it is suggested to limit this only to Contestable Customers and GEOP End-Users. Please also include definition on GEOP End-Users.  <b>IEMOP:</b>	<b>MERALCO:</b> <u><b>Retail Customer – An electricity end-user that is qualified to contract electricity supply from Suppliers, in accordance with qualifications issued by the ERC. For avoidance of doubt, this shall refer to Contestable Customers as prescribed in the Act and/or other GEOP End-Users allowed to participate as prescribed under the Rules on Green Energy Option Program or other relevant rules issued by the ERC. GEOP End-Users – shall refer to any person or entity requiring the supply and delivery of electricity sourcing 100% of its electricity</b></u>	<b>Response to MERALCO:</b> We agree with the proposed wording. For harmonization	Adopted MERALCO's proposal and IEMOP's reference to RE Law.

ANNEX C – Matrix of Proposed Amendments with Comments and Responses

WESM Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
					Suggest referring GEOP from the RE Law to parallel it with RCOA which is based under EPIRA.	<u>requirements from RE Resources for its own use.</u> <b>IEMOP:</b> <b><u>Retail Customer – An electricity end- user that is qualified to contract electricity supply from Suppliers, in accordance with qualifications issued by the ERC. For the avoidance of doubt, this shall refer to Contestable Customers that are allowed to participate in the Retail Competition Open Access as prescribed in the Act and/or End- Users that are allowed to participate in the Green Energy Option Program as prescribed in the Renewable Energy Act of 2008 (RE Law).</u></b>		

ANNEX B

B. WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures

WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
					<p><b>IEMOP:</b> <i>Propose to amend and/or add provisions to consider registration in the WESM of directly- connected customers wishing to participate in the Green Energy Option Program. Pursuant to Section 3.u of ERC Reso. No. 8, Series of 2021, GEOP End-Users must source 100% of its electricity requirements from RE resources. Thus, we propose that DCCs shall register in the WESM as Indirect WESM Members to manage spot exposure.</i></p> <p>Original provisions:</p>	<p><b>IEMOP:</b></p>		

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WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
					<p>2.5.1.2 c) A <i>Customer</i> shall register each of its <i>connection points</i> with the <i>Market Operator</i>. For each <i>Contestable Customer</i>, all <i>connection points</i> shall be registered under the same <i>Contestable Customer</i>.</p> <p>3.5.1.4 Only <i>WESM</i> registered <i>Suppliers</i> may enroll <i>Contestable Customers</i> with the <i>Market Operator</i>.</p>	<p>2.5.1.2 c) A <i>Customer</i> shall register each of its <i>connection points</i> with the <i>Market Operator</i>. For each <del><i>Contestable</i></del> <b><u>Retail</u></b> <i>Customer</i>, all <i>connection points</i> shall be registered under the same <del><i>Contestable</i></del> <b><u>Retail</u></b> <i>Customer</i>.</p> <p>3.5.1.4 Only <i>WESM</i> registered <b><u>Retail Electricity</u></b> <i>Suppliers</i> may enroll <i>Contestable Customers</i> <b><u>while only WESM registered Renewable Energy Suppliers may enroll Retail Customers under the Green Energy</u></b></p>		<p>Adopted the ff:</p> <p>1. Renaming of “<b><u>Retail Customers under the Green Energy Option Program</u></b>” to “<b><u>GEOP End-User</u></b>”</p> <p>2. Provision revised as:</p> <p><b><u>2.3.9 An entity that is mandated to register in the WESM as an Indirect WESM Member if it opts to participate as a GEOP End-User.</u></b></p>



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WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
						<p><u><b>Option Program</b></u> <u><b>that are connected</b></u> <u><b>to the <i>transmission</i></b></u> <u><b>system</b></u> with the <i>Market Operator.</i></p> <p>New revisions (to be placed in prior section):</p> <p><u><b>2.3.9 An entity that</b></u> <u><b>is mandated to</b></u> <u><b>register in the</b></u> <u><b>WESM shall</b></u> <u><b>register in the</b></u> <u><b>WESM as an</b></u> <u><b>Indirect WESM</b></u> <u><b>Member if it opts to</b></u> <u><b>participate as a</b></u> <u><b>Retail Customer</b></u> <u><b>under the Green</b></u> <u><b>Energy Option</b></u> <u><b>Program.</b></u></p>		
Categories and Qualificatio n	2.5.1.2.b )	b) The following are qualified to register as <i>Customer</i> –	b) The following are qualified to register as <i>Customer</i> –	Added Renewable Energy Supplier in compliance	<b>MERALCO:</b> There are definitions for Retail Electricity Supplier and	<b>MERALCO:</b> <u><b>GEOP End-User –</b></u> <u><b>Any person or</b></u> <u><b>entity requiring</b></u> <u><b>supply and</b></u>	<b>Response to</b> <b>MERALCO:</b> The inclusion of definition of GEOP End-User	No need to define GEOP End-User

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WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
- Customer s		<p>▪ <b>Distribution Utilities</b>, including private <i>distribution utilities, electric cooperatives</i> and <i>local government utilities</i> undertaking distribution of electricity.</p> <p>▪ <b>Retail Electricity Suppliers</b> that have been authorized to engage in retail electricity supply by the <i>ERC</i>, provided, however, that the RES may only register in the <i>WESM</i> upon declaration of retail competition and open access by and shall transact in the <i>WESM</i> and subject to relevant rules, regulations and issuances of the <i>ERC</i>. xxx</p>	<p>▪ <b>Distribution Utilities</b>, including private <i>distribution utilities, electric cooperatives</i> and <i>local government utilities</i> undertaking distribution of electricity.</p> <p>▪ <b>Retail Electricity Suppliers</b> that have been authorized to engage in retail electricity supply by the <i>ERC</i>, provided, however, that the RES may only register in the <i>WESM</i> upon declaration of retail competition and open access by and shall transact in the <i>WESM</i> and subject to relevant rules, regulations and issuances of the <i>ERC</i>.</p> <p>▪ <b><u>Renewable Energy Suppliers refers to suppliers that have</u></b></p>	with ERC Resolution No. 8, Series of 2021 Section 15.2b	<p>Renewable Energy Supplier as well as “Supplier”. It is unclear, however, what the intention is in defining “Supplier” separately, considering that the current proposed definition of Supplier does not seem to include Renewable Energy Supplier.</p> <p>In addition, since there is recognition under the proposal that there are 2 types of “Suppliers”, i.e., Retail Electricity Supplier and Renewable Energy Supplier, and both of these terms are defined, we suggest that the GEOP End-User should likewise be defined.</p>	<p><b><u>delivery of electricity sourcing 100% of its electricity requirements from renewable energy resources for its own use.</u></b></p>	<p>in the glossary of the WESM Rules should already suffice as terms used in the WESM Rules have the same meaning when used in the WESM Manuals.</p> <p>We deem that the definition of Supplier in the Retail Rules already covers both Retail Electricity Suppliers and Renewable Energy Suppliers, to wit:</p> <p>“Supplier – refers to any person or entity authorized by the ERC to</p>	

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WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures								
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			<u>been authorized by the ERC and DOE to engage in in the provision or supply of electric power from renewable energy resources to End-Users participating in the Green Energy Option Program, provided, however, that the Renewable Energy Supplier may only register in the WESM upon commencement of the Green Energy Option Program.</u>  xxx				sell, broker, market or aggregate electricity to the end-users and registered as a Customer pursuant to Clause 2.3.2 of the WESM Rules and Clause 2.4.1.2 and Clause 2.4.2.3 of these Retail Rules.”	
ENROLMENT AND DE-LISTING OF SUPPLY	(new)	(new)	<u>3.5.1.5 Prior to providing the notice under Clause 3.5.1.3, the Market Operator shall verify that Generation Companies that wish to enroll Renewable Energy</u>	Added to comply with DOE DC2020-04-0009 Section 9.3	<b>MERALCO:</b> Reference in the Rationale to Section 9.3 of DOE DC2020-04-0009 Section 9.3 seems misplaced as said	<b>MERALCO:</b> <u>3.5.1.5 Prior to providing the notice under Clause 3.5.1.3, the Market Operator shall</u>	<b>Response to MERALCO:</b> Our proposed revision to Clause 3.5.1.5 may already address MERALCO's concern.	For MERALCO's input:  3.5.1.5 Prior to providing the notice under Clause 3.5.1.3

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WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
CUSTOMERS			<u>Suppliers as supply customers must own, control or operate generation unit/s that are all producing electricity using renewable energy resources.</u>		<p>Section refers an obligation of the RE Supplier, in particular that the RE Supplier “ensure that the total power dispatch from its RE facilities should always be greater than or equal to the total kWh sold to its customers”, but not qualifications, as contemplated in the introduced Section 3.5.1.5.</p> <p>Section 11 of DOE DC 2018-07-0019 [requiring RE Suppliers to acquire an operating permit from the DOE, among other requirements] was operationalized through DC 2020-04-0009 which provides for RE Supplier Qualification and</p>	<u>verify that Generation Companies that wish to enroll Renewable Energy Suppliers as supply customers must own, control or operate generation unit/s that are all producing electricity using renewable energy resources, and possess the necessary qualifications in accordance with prevailing rules and regulations.</u>		<u>and if the supply customer is a Renewable Energy Supplier,</u> the Market Operator shall verify that <u>the market trading nodes designated as the source of supply Trading Participants</u> that wish to enroll Renewable Energy Suppliers as supply customers must own, control or operate <u>are</u> generation unit/s that are all producing electricity using renewable energy resources <u>Renewable</u>

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WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures								
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					<p>process to acquire an operating permit. DC 2020-04-0009 likewise provides for the grounds when the operating permit may be suspended, revoked, and/or cancelled.</p> <p>Considering that the DOE's issuance of an operating permit to the RE Supplier is essential to maintain its qualification to supply electricity under the GEOP Rules, this provision must be further qualified to capture this.</p> <p>Mere ownership, control and operation of a generating unit which uses renewable energy resources will</p>			<u><b>Energy Resources.</b></u>

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WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures								
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					<p>not suffice for a Renewable Energy Supplier to be qualified to become a Trading Participant.</p> <p><b>IEMOP:</b> To further clarify guidelines for contract enrollment involving GEOP participants.</p> <p>While the primary responsibility for ensuring that their supply portfolio is sourced entirely from RE resources rests with RE Suppliers pursuant to DOE DC2020-04-0009, IEMOP deems that an automatic verification mechanism in the market is ideal.</p>	<p><b>IEMOP:</b> 3.5.1.5 Prior to providing the notice under Clause 3.5.1.3 <b><u>and if the supply customer is a Renewable Energy Supplier</u></b>, the <i>Market Operator</i> shall verify that <b><u>the market trading nodes designated as the source of supply</u></b> <del>Trading Participants that wish to enroll Renewable Energy Suppliers as supply customers must own, control or operate</del> <b><u>are</u></b></p>		

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WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures								
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					If approved, implementation of this provision shall entail system enhancements which is dependent on budget availability. Assuming the budget is available, procurement, development, testing and software certification will take at least 9 months (initial estimate). – changed t	<i>generation unit/s</i> that are all producing electricity using <del>renewable</del> energy resources <b><u>Renewable Energy Resources.</u></b>		
EFFECTS OF SUSPENSION	4.4.1	4.4.1. From the time of the issuance of the Notice of Suspension until such time the suspension is revoked, the suspended <i>WESM</i> member is ineligible to participate in the <i>WESM</i> . As such, the suspended <i>WESM member</i> shall be disconnected from the transmission or	4.4.1. From the time of the issuance of the Notice of Suspension until such time the suspension is revoked, the suspended <i>WESM</i> member is ineligible to participate in the <i>WESM</i> . As such, the suspended <i>WESM member</i> shall be disconnected from the transmission or distribution system to which its facilities are	Added to include Renewable Energy Supplier to cover suspension of a Renewable Energy Supplier	<b>TC:</b> Will the suspended <i>WESM</i> member's registration and capacity be excluded from MDOM and registration list? What will be the process?  <b>MERALCO:</b> Since this scenario will fall under a Last Resort Supply Event		<b>Response to TC:</b> Subject to clarification from IEMOP process owner during RCC meeting  <b>Response to MERALCO:</b> Agree with MERALCO's comment. <b>Clause 4.4.1</b> needs to be updated as the	1. TC's query: for verification by IEMOP  2. Approved as revised:  4.4.1. From the time of the issuance of the Notice of Suspension until such time the



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		distribution system to which its facilities are connected. If the suspended WESM member is a Wholesale Aggregator or a <i>Retail Electricity Supplier</i> , the <i>Indirect WESM member</i> for whom it transacts in the WESM shall likewise be suspended from trading in the <i>WESM</i> and shall be disconnected from the transmission or distribution system, unless the latter complies with the conditions set forth in Chapter II. Clause 3.7 of this Manual.	connected. If the suspended WESM member is a Wholesale Aggregator, <del>or a <i>Retail Electricity Supplier</i></del> <u>or a <b><i>Renewable Energy Supplier</i></b></u> , the <i>Indirect WESM member</i> for whom it transacts in the WESM shall likewise be suspended from trading in the <i>WESM</i> and shall be disconnected from the transmission or distribution system, unless the latter complies with the conditions set forth in Chapter II. Clause 3.7 of this Manual.		(LRSE), the Indirect WESM member of a RES or RE Supplier <b>should not be automatically suspended and disconnected</b> from the transmission or distribution system unless it fails to avail of Supplier of Last Resort service, or it fails to find a new RES or RE Supplier.		clause being referred to no longer exists. Subject to further clarification from IEMOP process owner during RCC meeting  Chapter II. Clause 3.7 of this Manual. – no longer exist?	suspension is revoked, the suspended <i>WESM member</i> is ineligible to participate in the <i>WESM</i> . As such, the suspended <i>WESM member</i> shall be disconnected from the transmission or distribution system to which its facilities are connected. If the suspended WESM member is a Wholesale Aggregator, <del>or a <i>Retail Electricity Supplier</i></del> <u>or a <b><i>Renewable Energy Supplier</i></b></u> , the <i>Indirect WESM member</i> for whom it

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Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
								transacts in the WESM shall likewise be suspended from trading in the WESM and shall be disconnected from the transmission or distribution system, unless the latter complies with the conditions set forth in Chapter II, Clause 3.7 <b>Section 2.3.7</b> of this Manual.
EFFECTS OF DEREGISTRATION	5.6.2.2	5.6.2.2. If the deregistered WESM member is a Wholesale Aggregator or a Retail Electricity Supplier acting as a Direct WESM Member counterparty to an Indirect WESM	5.6.2.2. If the deregistered WESM member is a Wholesale Aggregator, or a Retail Electricity Supplier <u>or a Renewable Energy Supplier</u> acting as a Direct WESM	Added to include Renewable Energy Supplier to cover deregistration of a Renewable Energy Supplier	<b>MERALCO:</b> Same comment as above since this will also fall under LRSE.		<b>Response to MERALCO:</b> Same response as above.	Approved as revised.  5.6.2.2. If the deregistered WESM member is a Wholesale Aggregator, or a

ANNEX B

WESM Manual on Registration, Suspension and De-Registration Criteria and Procedures								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
		<i>member</i> and the latter does not comply with the requirements in Chapter II, Section 3.7 of this Manual, the facilities of the <i>Indirect WESM member</i> shall be disconnected.	<i>Member</i> counterparty to an <i>Indirect WESM member</i> and the latter does not comply with the requirements in Chapter II, Section 3.7 of this Manual, the facilities of the <i>Indirect WESM member</i> shall be disconnected.					<i>Retail Electricity Supplier</i> <u>or</u> <b><u>a Renewable Energy Supplier</u></b> acting as a <i>Direct WESM Member</i> counterparty to an <i>Indirect WESM member</i> and the latter does not comply with the requirements in Chapter II, <del>Section 3.7</del> <b>Section 2.3.7</b> of this Manual, the facilities of the <i>Indirect WESM member</i> shall be disconnected. - approved

ANNEX C

C. WESM Manual on Billing and Settlement

WESM Manual on Billing and Settlement								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
					<p><b>IEMOP:</b> <i>IEMOP proposes to include an additional clauses to comply with DOE DC2020-04-0009 Section 9.3 wherein Renewable Energy Suppliers must ensure the total power dispatched from its RE facilities should always be greater than or equal to the total kWh sold to its customers,</i></p> <p>While the primary responsibility for ensuring that their supply portfolio is sourced entirely from RE resources rests with RE Suppliers pursuant to DOE DC2020-04-0009, IEMOP deems that an</p>	<p><b>IEMOP:</b> Propose to <b>add</b> following clauses to Section 9.1:</p> <p><b><u>9.1.10 If the buying Trading Participant is a Renewable Energy Supplier, it shall ensure that its gross energy settlement quantity for each dispatch interval shall be fully covered by bilateral contract declarations.</u></b></p> <p><b><u>9.1.11 If the selling Trading Participant is a Renewable Energy Supplier and the buying Trading Participant is a Retail Customer</u></b></p>		<p>Approved.</p> <p>Note: Section 9.1.12 is contingent upon software enhancement</p>

ANNEX C

WESM Manual on Billing and Settlement								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
					<p>automatic verification mechanism in the market is ideal.</p> <p>If approved, implementation of this provision shall entail system enhancements which is dependent on budget availability. Assuming the budget is available, procurement, development, testing and software certification will take at least XX months (initial estimate).</p>	<p><u>under the Green Energy Option Program, the Renewable Energy Supplier shall ensure that the gross energy settlement quantity of the Retail Customer under the Green Energy Option Program for each dispatch interval shall be fully covered by bilateral contract declarations.</u></p> <p><u>9.1.12 In case of non-compliance with Clauses 9.1.10 and 9.1.11, the Market Operator shall promptly inform the affected parties to re-submit bilateral</u></p>		

ANNEX C

WESM Manual on Billing and Settlement								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
						<u>contract declarations.</u>		
Switch Request	7.4.7	<p>a) Upon receipt of a valid <i>switch request</i>, the <i>Market Operator</i> as the <i>Central Registration Body</i> shall immediately assess the compliance of the new <i>Supplier</i> and <i>Contestable Customer</i>, as applicable, with the <i>prudential requirements</i>.</p> <p>b) The <i>Market Operator</i> shall calculate the additional security required from the new <i>Supplier</i> and <i>Contestable Customer</i>, as applicable, using the following formula:</p> $AS_{s,c} = \frac{HMQ_c}{n_c} \times \frac{35}{30} \times MQE_{s,c}$ <p>× <i>AAMP<sub>past 12 billing periods</sub></i></p> <p>Where:</p> <p><i>AS<sub>s,c</sub></i> additional security, in PhP, to be provided by <i>Supplier s</i> for the switch of <i>Contestable Customer c</i></p> <p><i>HMQ<sub>c</sub></i> historical total <i>metered quantity</i>, in MWh, of <i>Contestable Customer c</i> from the past twelve (12) months</p>	<p>a) Upon receipt of a valid <i>switch request</i>, the <i>Market Operator</i> as the <i>Central Registration Body</i> shall immediately assess the compliance of the new <i>Supplier</i> and <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customer</i>, as applicable, with the <i>prudential requirements</i>.</p> <p>b) The <i>Market Operator</i> shall calculate the additional security required from the new <i>Supplier</i> and <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customer</i>, as applicable, using the following formula:</p> $AS_{s,c} = \frac{HMQ_c}{n_c} \times \frac{35}{30} \times MQE_{s,c}$ <p>× <i>AAMP<sub>past 12 billing periods</sub></i></p> <p>Where:</p> <p><i>AS<sub>s,c</sub></i> additional security, in PhP, to be provided by <i>Supplier s</i> for the switch of <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customer c</i></p> <p><i>HMQ<sub>c</sub></i> historical total <i>metered quantity</i>, in MWh, of <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customer c</i> from the</p>	Generalized to Retail Customer to cover End-Users under the Green Energy Option Program	<b>MERALCO:</b> Same comment as above since this will also fall under LRSE.		<b>Response to MERALCO:</b> Computation of prudential requirements is required during submission of switch request is consistent with Retail Rules Section 3.2.2.	Adopted IEMOP's original proposal.
							Subject to further clarification from IEMOP process owner during RCC meeting	

ANNEX C

WESM Manual on Billing and Settlement								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
		<p><math>n_c</math> number of days covered by the historical total <i>metered quantity</i> of <i>Contestable Customer c</i></p> <p><math>MQE_{s,c}</math> <i>metered quantity</i> exposure to the WESM, in %, of <i>Contestable Customer c</i> when supplied by <i>Supplier s</i></p> <p><math>AAMP_{past\ 12\ billing\ periods}</math> <i>average actual market price</i>, in PhP/MWh, for the past twelve (12) <i>billing periods</i></p> <p>c) The <i>Market Operator</i> shall calculate and provide to the new <i>Supplier</i> the amount of additional security required within two (2) <i>working days</i> from the receipt of the <i>switch request</i>.</p>	<p>past twelve (12) months</p> <p><math>n_c</math> number of days covered by the historical total <i>metered quantity</i> of <del><i>Contestable</i></del> <b><i>Retail Customer c</i></b></p> <p><math>MQE_{s,c}</math> <i>metered quantity</i> exposure to the WESM, in %, of <del><i>Contestable</i></del> <b><i>Retail Customer c</i></b> when supplied by <i>Supplier s</i></p> <p><math>AAMP_{past\ 12\ billing\ periods}</math> <i>average actual market price</i>, in PhP/MWh, for the past twelve (12) <i>billing periods</i></p> <p>c) The <i>Market Operator</i> shall calculate and provide to the new <i>Supplier</i> the amount of additional security required within two (2) <i>working days</i></p>					



ANNEX C

WESM Manual on Billing and Settlement								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision
			from the receipt of the <i>switch request</i> .					

ANNEX C – Matrix of Proposed Amendments with Comments and Responses

D. Retail Rules

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
					<b>MERALCO:</b> <i>We would like to request a meeting/public consultation, with IEMOP for stakeholders to discuss or expound on their comments</i>			IEMOP and MERALCO to meet and discuss separately and get back to the RCC if there are substantial changes/comments to the proposal.  MERALCO to coordinate and facilitate the meeting.
SCOPE OF CHAPTER 1	1.1.4	The Chapter 1 sets out the: xxx 1.1.4 Governance of the transactions of <i>Suppliers</i> and contestable customers with the <i>Central Registration Body</i> .	The Chapter 1 sets out the: xxx 1.1.4 Governance of the transactions of <i>Suppliers</i> and <del>contestable</del> <b>Retail</b> <del>e</del> <i>Customers</i> with the <i>Central Registration Body</i> .	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary		<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary.	Adopted IEMOP’s proposal.

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
PURPOSE, APPLICATI ON AND INTERPRE TATION OF THE RULES	1.2.2	These <i>Retail Rules</i> are promulgated to implement the provisions of the Act, its Implementing Rules and Regulations, and other related laws as well as to: 1.2.2.1 Promote retail competition; greater efficiency and customer choice; and 1.2.2.2 Provide rules for the management of the transactions of <i>Suppliers</i> and <i>Contestable Customers</i> and the operations of the <i>Central Registration Body</i> .	These <i>Retail Rules</i> are promulgated to implement the provisions of the <i>Act</i> , its Implementing Rules and Regulations, <b><u>Republic Act No. 9513 (“Renewable Energy Act of 2008”), its Implementing Rules and Regulations</u></b> and other related laws as well as to: 1.2.2.1 Promote retail competition; greater efficiency and customer choice; and 1.2.2.2 Provide rules for the management of the transactions of <i>Suppliers</i> and <del><i>Contestable Customers</i></del> <b><u>Retail Customers</u></b> and the operations of the <i>Central Registration Body</i> .	Included the RE Act as one of the legal basis of the Retail Rules and generalized to Retail Customers to include GEOP End-Users				Approved.

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
FRAMEWORK AND OBJECTIVES OF RETAIL COMPETITION AND THE RETAIL RULES	(new)	(new)	<b><u>1.3.5 Consistent with the Renewable Energy Act of 2008, the Green Energy Option Program (GEOP) promotes renewable energy by providing end-users a mechanism to source their electricity supply from renewable energy resources.</u></b>	To provide legal basis for including GEOP Procedures				Approved.
FRAMEWORK AND OBJECTIVES OF RETAIL COMPETITION AND THE RETAIL RULES	(new)	(new)	<b><u>1.3.6 Upon commencement of the Green Energy Option Program, Contestable Customers and other End-Users allowed under the Rules on Green Energy Option Program issued by the RC may transact with Renewable Energy Suppliers to participate in the GEOP.</u></b>	To provide legal basis for including GEOP Procedures	<b>APC:</b> (Additional remark: (should be ...issued by the ERC?” - typo)  <b>MERALCO:</b> 1. We note that existing rules of DOE and ERC do not specifically and expressly mention Contestable Customers as being allowed to	<b>MERALCO:</b> 1.3.6 <b><u>Upon commencement of the Green Energy Option Program, qualified <u>GEOP</u> End-Users may transact</u></b>	<b>Response to APC:</b> Agree, for correction.  <b>Response to MERALCO:</b> Agree with MERALCO’s proposed revision to Clause 1.3.6	Adopted APC’s and MERALCO’s revisions.

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
					participate under GEOP. What is clear under the existing rules is that “GEOP End- Users” are those that require the supply and delivery of electricity sourcing 100% from RE and provided they fall in the threshold of 100 kW and above. While the threshold may essentially include Contestable Customers, still, existing rules of DOE and ERC do not specifically and expressly mention Contestable Customers as being allowed to participate under GEOP.	with <u>licensed and registered Renewable Energy Suppliers to participate in the GEOP.</u>		

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
					<p>For consistency with existing rules, we suggest to revise 1.3.6.</p> <p>2. It should also be noted that the term “End-User” is capitalized but does not appear to have any provided definition. On the other hand, the term “GEOP End-User” appears in other parts of the document. For consistency and clarity, if referring to end-user eligible to participate under GEOP Rules, then should be referred to as “GEOP End-User”. See proposed definition.</p> <p>Also revised to align with proposed</p>			

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
					new amendment in Section 2.4.2 of the Retail Rules.			
CENTRAL REGISTRA TION BODY	1.4.1	1.4.1.1 The <i>Central Registration Body</i> shall, generally and non-restrictively, have the following functions and responsibilities: a) Maintain a registry of all Contestable Customers who have already been awarded a certificate of contestability by the ERC; b) Carry out customer switching between a Distribution Utility and a Supplier, and between Suppliers; c) Determine gross energy settlement quantities of Contestable Customers and Suppliers;	1.4.1.1 The <i>Central Registration Body</i> shall, generally and non- restrictively, have the following functions and responsibilities: a) Maintain a registry of all <b><u>Retail Customers, which include</u></b> Contestable Customers who have already been awarded a certificate of contestability by the ERC; <sup>1</sup> <b><u>and other End-Users eligible to participate in the Green Energy Option Program;</u></b> b) Carry out customer switching between a Distribution Utility and a	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> 1. See related comment above on use of term “Retail Customer” and “End-User”. 2. For 1.4.1.1, while ERC has issued COCs in the past, the ERC recently said it will no longer issue any COC. Section 3 of ERC Resolution No. 12, Series of 2020 <sup>1</sup> and Section 4.2 of ERC Resolution No. 08, Series of 2021 <sup>2</sup> (Annex A), require	<b>MERALCO:</b> xxx a) Maintain a registry of all <b><u>Retail Customers, which include Contestable Customers and GEOP End- Users;</u></b>	<b>Response to MERALCO:</b> Please see our proposed changes to Clause 1.4.1.1 which may already address MERALCO’s comments. Agree to specify GEOP End-Users instead of “other End-Users”	1. Adopted IEMOP’s revision. 2. Adopted MERALCO’s revision to use the term GEOP End- User.

<sup>1</sup> A Resolution Prescribing the Timeline for the Implementation of the Retail Competition and Open Access (RCOA)

<sup>2</sup> Rules for the Green Energy Option Program (GEOP)



ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
		d) Collect and manage metering data of Contestable Customers from Retail Metering Services Providers; e) Allocate resources to enable it to perform its functions; f) Provide an information exchange amongst Retail Competition Participants; and g) Comply with rules and regulations as may be provided by ERC.	Supplier, and between Suppliers; c) Determine gross energy settlement quantities of <del>Contestable</del> <b>Retail</b> Customers and Suppliers; d) Collect and manage metering data of <del>Contestable</del> <b>Retail</b> Customers from Retail Metering Services Providers; e) Allocate resources to enable it to perform its functions; f) Provide an information exchange amongst Retail Competition Participants; and g) Comply with rules and regulations as may be provided by ERC.		Network Services Providers to notify qualified Retail Customers via their monthly billing statements, in lieu of Certificates of Contestability from the ERC. In line with this, we note that there are instances when the issuance of monthly billing statements with proof of eligibility is not applicable (e.g., newly connected customer with 3MW and up forecasted demand who wants to immediately switch to RCOA; and switched customers who want to transfer to another RES). For such instances,			

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
					<p>MERALCO issues eligibility letters, as coordinated with ERC.</p> <p>Thus, we would like to take this opportunity to <b>update Section 1.4.1.1 of the Retail Rules.</b></p> <p>3. Also, it is unclear why there is a need to provide qualification, i.e., for customers who have already been awarded a certificate of contestability by the ERC. <b>What is the definition of Contestable Customer? We propose Section (a) to be reworded.</b></p> <p><b>IEMOP:</b></p>	<p><b>IEMOP:</b></p> <p>1.4.1.1 The <i>Central Registration Body</i> shall, generally and non-restrictively, have the following functions and responsibilities:</p> <p>a) Maintain a registry of all <i>Retail Customers</i>, which include Contestable Customers <b><u>that are eligible to participate under retail competition</u></b> who have already been awarded a certificate of</p>		

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
					The purpose of the following proposed amendments is to harmonize the NSPs’ responsibility for submission of customer information to the CRB and the CRB’s responsibility to maintain the information submitted to it for both RCOA and GEOP. The requirement to determine whether the End-User has signified interest is included to comply with the minimum requirement set out in ERC GEOP Rules Section 15.3b..	contestability by the ERC, and other <i>End-Users</i> <b><u>that are</u></b> eligible to participate in the <i>Green Energy Option Program</i> . <b><u>For each Retail Customer, the Central Registration Body shall indicate whether the Retail Customer is already registered with the Central Registration Body or if not, whether the Retail Customer has signified interest, through its Network Service Provider, to participate</u></b>		

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
						<u>under retail competition or the Green Energy Option Program;</u> b) Carry out customer switching between a Distribution Utility and a Supplier, and between Suppliers; c) Determine gross energy settlement quantities of <i>Retail Customers</i> and Suppliers; d) Collect and manage metering data of <i>Retail Customers</i> from Retail Metering Services Providers; e) Allocate resources to		

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
						enable it to perform its functions; f) Provide an information exchange amongst Retail Competition Participants; and g) Comply with rules and regulations as may be provided by ERC.		
GOVERNANCE OF THE MARKET	1.5.1	1.5.1 The provisions of Chapter 1 of the <i>WESM Rules</i> shall govern the operations of the <i>Central Registration Body</i> and the participation and transactions of <i>Suppliers</i> and <i>Contestable Customers</i> .	1.5.1 The provisions of Chapter 1 of the <i>WESM Rules</i> shall govern the operations of the <i>Central Registration Body</i> and the participation and transactions of Suppliers and <u>Contestable Retail Customers</u> .	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary		<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary.	Approved.
GOVERNANCE OF	1.5.2	1.5.2 When relevant, necessary or practicable, the PEM Board may create	1.5.2 When relevant, necessary or practicable, the PEM Board may create	Generalized to Retail Customers	<b>MERALCO:</b>		<b>Response to MERALCO:</b>	Approved.

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
THE MARKET		working groups to deal with matters specifically pertaining to the operations of the <i>Central Registration Body</i> and the participation and transactions of <i>Suppliers</i> and <i>Contestable Customers</i> .	working groups to deal with matters specifically pertaining to the operations of the <i>Central Registration Body</i> and the participation and transactions of <i>Suppliers</i> and <i>Contestable <u>Retail</u> Customers</i> .	to include GEOP End-Users	Same comment under 3.2.2.7 and Glossary		We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary.	
Scope of Chapter 2	2.1	This Chapter 2 sets out the rules for registration of <i>Suppliers</i> , <i>Contestable Customers</i> and <i>Retail Metering Services Providers</i> .	This Chapter 2 sets out the rules for registration of <i>Suppliers</i> , <i>Contestable <u>Retail</u> Customers</i> and <i>Retail Metering Services Providers</i> .	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary		<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary.	Approved.
CONTESTA BLE CUSTOME RS	2.2	<b>2.2 CONTESTABLE CUSTOMERS</b>	<b>2.2 CONTESTABLE <u>RETAIL</u> CUSTOMERS</b>	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary		<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary.	Approved.

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
CONTESTABLE CUSTOMERS	2.2.1	2.2.1 Contestability of electricity end users shall be certified by the ERC and only the end users that have been issued a certification of contestability may be registered and permitted to transact with the <i>Central Registration Body</i> , or, as a voluntary <i>Participant</i> in the <i>WESM</i> .	<b>2.2.1 Eligibility of Retail Customers</b> <del>2.2.1</del> <b>2.2.1.1 Contestable Customers</b> - Contestability of electricity end users shall be certified by the ERC and only the end users that have been issued a certification of contestability <u>or has been certified as such under applicable laws or rules</u> may be registered and permitted to transact with the <i>Central Registration Body</i> , or, as a voluntary <i>Participant</i> in the <i>WESM</i> . <b>2.2.1.2 Other End-Users – Electricity end-users that have not yet met the contestability requirements: (a) but have been identified by their respective Distribution Utilities to, and provided only that they, have met the criteria to qualify as a Green Energy Option Program End-User</b>	Expanded the eligibility requirements of contestable customers to reflect the updated ERC policies and harmonize it with DOE DC2021-06-0012. Defines the End-Users that comprise the Retail Customers and their corresponding eligibility, including the GEOP End-Users.	<b>MERALCO:</b> While ERC has certified customers in the past to be eligible to participate in the contestable market, please see ERC Res. No. 12, S. 2020, where the ERC effectively said it will no longer issue any COC (Section 3). Hence, ERC will not “certify” end-users as eligible. For Section 2.2.1.2, may we clarify if the intention is to cover GEOP End-Users? If yes:  (a) Suggest to use term “GEOP End-User” instead of “other End-Users”;	<b>MERALCO:</b> <b>2.2.1.1 Contestable Customers</b> - Only the end users that have been <u>previously</u> issued a certification of contestability <u>by ERC, have received a monthly billing statement with eligibility notification from its Network Services Provider, and/or eligibility letters for cases when the issuance of said monthly billing statement is not applicable, or have been certified as such under applicable</u>	<b>Response to MERALCO:</b> We deem that inclusion of the phrase “ <u>or has been certified as such under applicable laws or rules</u> ” already covers other cases for determining eligibility as mentioned in MERALCO’s comments. Subject to further clarification from IEMOP process owner during RCC meeting	1. Adopted IEMOP’s proposal. 2. MERALCO’s proposal will be included in the GEOP Manual. 3. For 2.2.1.2 – Adopted MERALCO’s revision.

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
			<u>pursuant to guidelines set by the ERC may be registered; and (b) permitted to transact with the Central Registration Body.</u>		(b) Is meeting the contestability requirements a requirement for GEOP End-User or related to registration as a GEOP End-User? To avoid confusion, suggest to delete reference to “[e]lectricity end-users that have not yet met the contestability requirements: xxx”.	<u>laws or rules</u> may be registered and permitted to transact with the <i>Central Registration Body</i> , or, as a voluntary <i>Participant</i> in the <i>WESM</i> .  <u>2.2.1.2 GEOP</u> <del>Other</del> <u>End-Users</u> <u>– Electricity end-users that have not yet met the contestability requirements: (a) but have been identified by their respective Distribution Utilities to, and provided only that they, have met the criteria to qualify as a</u>		

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
						<u>participate in the Green Energy Option Program End-User pursuant to guidelines set by the ERC may be registered; and (b) permitted to transact with the Central Registration Body.</u>		
CONTESTABLE CUSTOMERS	2.2.2	2.2.2 Distribution utilities shall notify the <i>Central Registration Body</i> of any end user that has met the requirements to be certified as <i>Contestable Customer</i> and shall provide the customer information required in Section 2.3 of this Chapter 2. Upon such notice, the <i>Central Registration Body</i> shall secure confirmation from the <i>ERC</i> if such end user has been certified as contestable and, if	2.2.2 Distribution utilities shall notify the <i>Central Registration Body</i> of any end user that has met the requirements to be certified as <i>Contestable Customer</i> <u>and/or as End-User under the Green Energy Option Program</u> and shall provide the customer information required in Section 2.3 of this Chapter 2. <del>Upon such notice, the Central Registration Body shall secure confirmation</del>	To enjoin DUs to indicate whether an End-User qualifies under RCOA or GEOP or both. Deleted portion on confirmation of contestability from ERC in line with ERC’s revised contestability guidelines.	<b>MERALCO:</b> The provision, as worded, can be confusing since it mentions notification by the DU to the CRB of any end user that has met the requirements “to be certified” as Contestable Customer or GEOP End-user.	<b>MERALCO:</b> 2.2.2 Distribution utilities shall notify the <i>Central Registration Body</i> of any end user that has met the requirements to be certified as <i>Contestable Customer</i> and/or as <u><b>GEOP End-User under the Green Energy</b></u>	<b>Response to MERALCO:</b> Agree with proposed revision. IEMOP does not issue a separate certification. Consider to change “to be certified” to “to become”	Approved as revised below: Distribution utilities shall notify the <i>Central Registration Body</i> of any end user that has met the requirements to be certified <b>become</b> as <i>Contestable</i>

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		so certified, shall maintain a record of the customer for registration and other purposes specified in these rules	<del>from the ERC if such end user has been certified as contestable and, if so certified, shall maintain a record of the customer for registration and other purposes specified in these rules.</del>		1. What does the phrase “to be certified” mean? Will PEMC have a separate certification for these customers? 2. The phrase “to be certified” is also confusing vis-à-vis Section 2.3 which recognizes submission by DUs of information of “end users within its franchise area that it deems to have already met the required demand threshold.”	<u><b>Option Program</b></u> and shall provide the customer information required in Section 2.3 of this Chapter 2.		<i>Customer <u>and/or as End-User under the Green Energy Option Program</u> and shall provide the customer information required in Section 2.3 of this Chapter 2.</i>
CONTESTABLE CUSTOMERS	(new)	(new)	<b><u>2.2.4 A Retail Customer that is not a Contestable Customer duly certified and recorded by the Central Registration Body may voluntarily:</u></b> <b><u>a) Elect to source its supply from a Renewable</u></b>	To clarify the options provided for GEOP End-Users that are not Contestable Customers	<b>TC:</b> To exercise item (a), the customer should have a demand of 100 kW or more. Are all contestable customers		<b>Response to TC:</b> This provision was intended to be applicable to End-Users who have qualified to be GEOP End-Users but are not	Adopted MERALCO’s revision.

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					issue a separate certification that a customer is a Contestable Customer or a GEOP End-User, or, in the alternative, will CRB issue a separate certification that a customer is <b>NOT</b> a Contestable Customer or a GEOP End-User, since that is what the provision suggests? Suggest to refer to this portion as “GEOP End-User”. A Retail Customer may include new entities in additional programs in the future (e.g., Retail Aggregation).	<b><u>a) Elect to source its supply from a Renewable Energy Supplier and register with the Central Registration Body; or</u></b> <b><u>b) Continue to be served by the Distribution Utility until it elects to purchase electricity from a Renewable Energy Supplier.</u></b>	MERALCO’s proposed revisions.	

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CONTESTABLE CUSTOMERS	2.2.4	2.2.4 The registration of <i>Contestable Customers</i> shall be in respect to their facilities that have been issued certifications of contestability by the ERC, Provided, that – 2.2.4.1 <i>Contestable Customers</i> that have more than one <i>registered facility</i> shall have multiple registrations; and 2.2.4.2 Registration shall be in accordance with the certification of contestability issued by the <i>ERC</i> and each <i>registered facility</i> covered by one certification of contestability shall have a single and separate registration, regardless that the same is served by more than one metering installation.	<del>2.2.4</del> <b>2.2.5</b> The registration of <i>Contestable Customers</i> shall be in respect to their facilities that have been issued certifications of contestability by the ERC, Provided, that – <del>2.2.4.1</del> <b>2.2.5.1</b> <i>Contestable Customers</i> that have more than one <i>registered facility</i> shall have multiple registrations; and <del>2.2.4.2</del> <b>2.2.5.2</b> Registration shall be in accordance with the certification of contestability issued by the <i>ERC</i> and each <i>registered facility</i> covered by one certification of contestability shall have a single and separate registration, regardless that the same is served by more than one metering installation.	Renumbered due to inserted provision	<b>MERALCO:</b> Please incorporate recent developments on the issuance of proof of contestability/ GEOP eligibility (i.e., DUs to notify End-Users who have qualified to be Contestable Customer and/or GEOP End-User in their monthly bills.)	<b>MERALCO:</b> <b>2.2.5</b> The registration of <i>Contestable Customers</i> shall be in respect to their facilities that have been issued certifications of contestability by the ERC <b>or</b> <b><u>determined as eligible by the DU, as provided in the monthly billing statement, pursuant to relevant ERC Rules and Regulations</u></b> xxx.	<b>Response to MERALCO:</b> Agree with proposed revisions.	Adopted MERALCO’s revision.
CONTESTABLE CUSTOMERS	2.2.5	2.2.5 <i>Contestable Customers</i> that are directly connected to the <i>transmission system</i> shall be listed with the <i>Central</i>	<del>2.2.5</del> <b>2.2.6</b> <i>Contestable Customers</i> that are directly connected to the <i>transmission system</i> shall be	Renumbered due to inserted provision	<b>IEMOP:</b> Revised to consider End-Users under the	<b>IEMOP:</b> <del>2.2.6</del> <i>Contestable Retail Customers</i> that are directly		Approved.

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		<i>Registration Body</i> based on the information from the <i>ERC</i> for monitoring purposes.	listed with the <i>Central Registration Body</i> based on the information from the <i>ERC</i> for monitoring purposes.		GEOP that are directly connected to the transmission system.	connected to the <i>transmission system</i> shall be listed with the <i>Central Registration Body</i> based on the information from the <i>ERC</i> for monitoring purposes.		
CONTESTABLE CUSTOMER INFORMATION	2.3	<b>2.3 CONTESTABLE CUSTOMER INFORMATION</b>	<b>2.3 CONTESTABLE RETAIL CUSTOMER INFORMATION</b>	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary		<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary.	Approved.
CONTESTABLE CUSTOMER INFORMATION	2.3.1.1	2.3.1.1 All <i>Distribution Utilities</i> shall submit the following information to the <i>Central Registration Body</i> on all end users within its franchise area that it deems to have already	2.3.1.1 All <i>Distribution Utilities</i> shall submit the following information to the <i>Central Registration Body</i> on all end users within its franchise area that it deems to have already met the required demand	To enjoin DUs to indicate whether an End-User qualifies under RCOA or GEOP or both.	<b>PEMC</b> Clerical enhancements	<b>PEMC</b> (f) Meter specifications (interval metering, channels); <b>and</b> (g) SEIN of the grid <i>metering</i>	<b>PEMC</b> Agree with correction.	1. For PEMC’s comment – approved. 2. IEMOP’s additional proposal [Section

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		met the required demand threshold. (a) Customer name; (b) Billing and service addresses; (c) Customers’ account number; (d) Customer contact information (telephone numbers and e-mail addresses); (e) Meter number; (f) Meter specifications (interval metering, channels); and (g) SEIN of the grid <i>metering point</i> of the <i>Distribution Utility</i> where the supply of the end user passes through	threshold <u>to participate in retail competition and/or in the Green Energy option Program</u> . (a) Customer name; (b) Billing and service addresses; (c) Customers’ account number; (d) Customer contact information (telephone numbers and e-mail addresses); (e) Meter number; (f) Meter specifications (interval metering, channels); and (g) SEIN of the grid <i>metering point</i> of the <i>Distribution Utility</i> where the supply of the end user passes through <u>(h) Confirmation that the end-user has qualified either for retail competition or GEOP, or both</u>		<b>MERALCO:</b> We would like to respectfully suggest that IEMOP should streamline the reporting process and harmonize its reportorial requirements with Energy Regulatory Commission’s (ERC), considering that there are other reports already containing the same information being required here.	<i>point</i> of the <i>Distribution Utility</i> where the supply of the end user passes through <b>and</b> <b>(h) Confirmation that the end-user has qualified either for retail competition or GEOP, or both.</b>  <b>MERALCO:</b> We respectfully recommend the DELETION of this provision for being superfluous given that other reportorial requirements that DUs are also required to submit to the IEMOP already contain	<b>MERALCO:</b> Our proposed revision already allows NSPs to submit a single report for customer information of qualified Contestable Customers and GEOP End-Users. Submission of the information listed in this provision is in line with reportorial requirements	2.3.1.1 (i)] – approved; details to be discussed between IEMOP and MERALCO..

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					For RCOA, DUs already regularly submit the monthly Contestability Reports, to both ERC and IEMOP (every 15 <sup>th</sup> and 20 <sup>th</sup> of the month), pursuant to Article VII, Section 2 of ERC Resolution No. 09, Series of 2018, and Section 5 of ERC Resolution No. 12, Series of 2020, Chapter 2 of the Retail Rules Clause 2.2.2 and 2.3.1, DOE Circular No. DC2013-01-0002, and Section 5 of ERC Resolution No. 12, Series of 2020. Said report, using the ERC-prescribed	similar information.	under the ERC GEOP Rules and ERC Reso No. 8, series of 2019	

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					template, DU Form-2, contains qualified end-users and newly-eligible end-users for Phase III and up (every 15th) and Phase IV (every 20th). Further, there is also a GEOP report submitted to IEMOP, regarding end-users qualified for GEOP with information if such end-users signified interest to participate in GEOP, which is submitted pursuant to Sections 2.5.1 and 2.5.2 of the proposed Retail Manual on Green Energy Option Program Procedures and			

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					Section 15.3 (b) of ERC Resolution No. 08, Series of 2021. Moreover, Section 48 of the ERC Resolution No. 08, Series of 2021, also require DUs to submit a report for actual end-users who switched to GEOP. Given the above, the proposed amendment requires similar information on whether the customer has qualified for said programs. Thus, we recommend that there should only be one report for each program (i.e., one report for RCOA and one	<b>IEMOP:</b> 2.3.1.1 All <del>Distribution Utilities</del> <b><u>Network Service Providers</u></b> shall submit the following information to the <i>Central Registration Body</i> on all <b><u>newly qualified</u></b> end users within its franchise area that it deems to have already met the required demand threshold to participate in		

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					report for GEOP), for operational efficiency and to ensure timely submission of reports.  <b>IEMOP:</b> The purpose of the following proposed amendments is to harmonize the NSPs’ responsibility for submission of customer information to the CRB and the CRB’s responsibility to maintain the information submitted to it for both RCOA and GEOP. The requirement to determine whether the End-User has	retail competition and/or in the <i>Green Energy option Program</i> . (a) Customer name; (b) Billing and service addresses; (c) Customers’ account number; (d) Customer contact information (telephone numbers and e- mail addresses); (e) Meter number; (f) Meter specifications (interval metering, channels); and (g) SEIN of the grid <i>metering point</i> of the <i>Distribution Utility</i> where the supply		

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					signified interest is included to comply with the minimum requirement set out in ERC GEOP Rules Section 15.3b.	of the end user passes through (h) Confirmation that the end-user has qualified either for retail competition or GEOP <b><u>Green Energy Option Program</u></b> , or both <b><u>(i) Confirmation that the end-user has signified interest to participate under retail competition or Green Energy Option Program, or both</u></b>		
Request and Release of Customer Information	2.3.2.1	2.3.2.1 Upon prior authorization, provided in written or electronic form, by a <i>Contestable Customer</i> , the <i>Central Registration Body</i> shall provide the information so authorized to the <i>Supplier</i> or to	2.3.2.1 Upon prior authorization, provided in written or electronic form, by a <del>Contestable</del> <b><u>Retail</u></b> <i>Customer</i> , the <i>Central Registration Body</i> shall provide the information so	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary		<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail	Approved.

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		such other person or entity authorized by the <i>Contestable Customer</i> .	authorized to the <i>Supplier</i> or to such other person or entity authorized by the <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customer</i> .				Customer for inclusion in the Glossary.	
SUPPLIER S AND RETAIL METERING SERVICES PROVIDER S	(new)	(new)	<b><u>2.4.2 Before being able to transact for the supply of electricity to Retail Customers under the Green Energy Option Program, Suppliers intending to transact as a Renewable Energy Supplier shall: 2.4.2.1 Hold a license or authorization from the ERC to act as a retail electricity Supplier, 2.4.2.2 Hold a Green Energy Option Program operating permit from the DOE, and 2.4.2.3 Register in the WESM as a Direct WESM Member under the Customer Trading Participant category and shall fulfil all such registration requirements</u></b>	To define requirements for Renewable Energy Supplier. ERC GEOP Rules Section 12 prescribes that the RE Supplier shall secure a Retail Electricity Supplier license from the ERC	<b>MERALCO:</b> For clarity, suggest to refer to applicable rules where such requirements are found. Correction of minor typo from “fulfil” to “fulfill”.	xxx <b>2.4.2.1 Secure a Retail Electricity Supplier license from the ERC pursuant ERC Resolution No. 01, Series of 2011, and amendments thereto. 2.4.2.2 Hold a Green Energy Option Program operating permit from the DOE pursuant to DOE Department Circular No. DC 2020-04-0009 and any</b>	<b>MERALCO:</b> Agree with MERALCO’s proposed revision	Approved.

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			<u>as set out in the <i>WESM Rules</i> Chapter 2.</u>			<u>amendments thereto, and 2.4.2.3 Register in the <i>WESM</i> as a <i>Direct WESM Member</i> under the <i>Customer Trading Participant</i> category and shall <b>fulfill</b> all such registration requirements as set out in the <i>WESM Rules</i> Chapter 2.</u>		
SUPPLIERS AND RETAIL METERING SERVICES PROVIDERS	2.4.2	2.4.2 Distribution utilities before being able to transact for the supply of electricity to <i>Contestable Customers</i> , as <i>Supplier</i> and/or <i>Supplier of Last Resort</i> , shall register as a <i>Direct WESM Member</i> in accordance with the requirements and procedures for registration set out in the <i>WESM Rules</i> Chapter 2 for	<del>2.4.2</del> <b>2.4.3</b> <b>Distribution utilities</b> before being able to transact for the supply of electricity to <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customers</i> , as <i>Supplier</i> and/or <i>Supplier of Last Resort</i> , shall register as a <i>Direct WESM Member</i> in accordance with the requirements and procedures for registration set out in the	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Minor grammatical correction. Same comment under 3.2.2.7 and Glossary for term “Retail Customer”	<b>MERALCO:</b> Distribution utilities, before being able to transact for the supply of electricity to <i>Retail Customers</i> , as <i>Supplier</i> and/or <i>Supplier of Last Resort</i> , shall	<b>Response to MERALCO:</b> Agree with correction. We agree with MERALCO’s proposed changes to the definition of Retail Customer for	Adopted MERALCO’s revision.

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		transactions in respect to the supply of electricity to <i>Contestable Customers</i> .	<i>WESM Rules</i> Chapter 2 for transactions in respect to the supply of electricity to <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customers</i> .			register as a <i>Direct WESM Member</i> in accordance with the requirements and procedures for registration set out in the <i>WESM Rules</i> Chapter 2 for transactions in respect to the supply of electricity to <i>Retail Customers</i> .	inclusion in the Glossary.	
SUPPLIER S AND RETAIL METERING SERVICES PROVIDER S	2.4.3	2.4.3 Before being able to provide metering services for <i>Contestable Customers</i> , a <i>Retail Metering Services Provider</i> shall:  2.4.3.1 Hold license as a <i>Retail Metering Services Provider</i> issued by the <i>ERC</i> ; and  2.4.3.2 Register in the <i>WESM</i> as a <i>Retail Metering Services Provider</i> and shall fulfil all such registration requirements as	2.4.3 <b>2.4.4</b> Before being able to provide metering services for <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customers</i> , a <i>Retail Metering Services Provider</i> shall: 2.4.3.1 <b>2.4.4.1</b> Hold license as a <i>Retail Metering Services Provider</i> issued by the <i>ERC</i> ; and 2.4.3.2 <b>2.4.4.2</b> Register in the <i>WESM</i> as a <i>Retail Metering Services Provider</i> and shall fulfil all such registration	<ul style="list-style-type: none"><li>Generalized to Retail Customers to include GEOP End-Users</li><li>Re-numbering</li></ul>	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary There should also be a condition which would state that before being able to provide metering services to Retail Customers, the ERC should have already declared	<b>MERALCO:</b> 2.4.4___Before <b>a</b> <b>Retail Metering Services Provider is allowed being able</b> to provide metering services for <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customers</i> , <b>the ERC should have already declared</b>	<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary. However, we maintain that there is no need to qualify that	1. Adopted MERALCO’s changes to the definition of Retail Customer. 2. Adopted IEMOP’s response.

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		set out in the <i>WESM Rules</i> Chapter 2 and relevant <i>Market Manual</i> .  2.4.4 At the commencement of <i>retail competition</i>	requirements as set out in the <i>WESM Rules</i> Chapter 2 and relevant <i>Market Manual</i> .		RMSP as competitive. Without such declaration, the DU shall continue to be the RMSP in the Retail Market.	<u><b>metering as competitive.</b></u> <u><b>Once this is satisfied, the a</b></u> <i>Retail Metering Services Provider</i> shall ensure that it: <u><b>2.4.4.1</b></u> Hold <u><b>s</b></u> license as a <i>Retail Metering Services Provider</i> issued by the <i>ERC</i> ; and 2.4.3.2 <u><b>2.4.4.2</b></u> Register <u><b>s</b></u> in the <i>WESM</i> as a <i>Retail Metering Services Provider</i> and shall fulfil all such registration requirements as set out in the <i>WESM Rules</i> Chapter 2 and relevant <i>Market Manual</i> .	Clause 2.4.4 shall only apply once competitive metering services is allowed by the ERC as it is clear in succeeding provisions that DUs may serve as default RMSPs.	

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SUPPLIER S AND RETAIL METERING SERVICES PROVIDER S	2.4.4	2.4.4 At the commencement of <i>retail competition</i> , the <i>Distribution Utilities</i> shall serve as the default <i>Retail Metering Services Provider</i> for <i>Contestable Customers</i> with service addresses located within their franchise area, and as such, are deemed registered in the <i>WESM</i> without need of complying with the requirements set in Clause 2.4.3 of this Chapter 2.	<del>2.4.4</del> <b>2.4.5</b> At the commencement of <del>retail competition</del> , the <i>Distribution Utilities</i> shall serve as the default Retail Metering Services Provider for <del>Contestable</del> <b><u>Retail</u></b> <i>Customers</i> with service addresses located within their franchise area, and as such, are deemed registered in the <i>WESM</i> without need of complying with the requirements set in Clause 2.4.3 of this Chapter 2.	Removed the introductory term as retail competition as commenced already Change to Retail Customers in order to provide a general term for Contestable Customers and GEOP End - Users which are not contestable Customers	<b>IEMOP:</b> To clarify registration requirements for Retail MSPs intending to provide services under the GEOP  The CRB still requires DUs to submit necessary requirements to facilitate registration as RMSP.	<b>IEMOP:</b> 2.4.5 Distribution Utilities shall serve as the default Retail Metering Services Provider for <i>Retail Customers</i> with service addresses located within their franchise area, and as such, <del>are deemed</del> <b><u>shall</u></b> registered in the <i>WESM</i> without need of complying <b><u>in accordance</u></b> with the requirements set in Clause 2.4.3 of this Chapter 2. <b><u>The Market Operator may also require existing Retail Metering Services</u></b>		Adopted as revised below: <b><u>The Market Operator may also require existing Retail Metering Services Providers currently serving Contestable Customers who intends to provide service to GEOP End-Users to submit registration requirements.</u></b>

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						<u>Providers currently serving Contestable Customers who intends to provide service to Retail Customers under the Green Energy Option Program to submit registration requirements.</u>		
REGISTRATION PROCESS	2.5	The <i>Central Registration Body</i> shall prepare and publish a <i>Market Manual</i> in accordance with Chapter 8 of the <i>WESM Rules</i> which sets out: 2.5.1 The requirements and procedures which <i>Suppliers, Contestable Customers</i> and <i>Retail Metering Services Providers</i> shall follow to enable registration in the <i>WESM</i> , which requirements and procedures shall be consistent	The <i>Central Registration Body</i> shall prepare and publish a <i>Market Manual</i> in accordance with Chapter 8 of the <i>WESM Rules</i> which sets out: 2.5.1 The requirements and procedures which <i>Suppliers, Contestable Customers</i> and <i>Retail Metering Services Providers</i> shall follow to enable registration in the <i>WESM</i> , which requirements	This is to provide basis for the new GEOP Manual	<b>MERALCO:</b> It appears there is intention to distinguish Contestable Customers and GEOP End-Users, as well as RES and RE Suppliers.	<b>MERALCO:</b> The <i>Central Registration Body</i> shall prepare and publish a <i>Market Manual</i> in accordance with Chapter 8 of the <i>WESM Rules</i> which sets out: 2.5.1 The requirements and procedures which	<b>Response to MERALCO:</b> Agree with proposed revision.	1. Adopted MERALCO’s revision in 2.5.1  2. Approved Section 2.5.2, as revised, below: <b><u>2.5.2 The requirements and procedures</u></b>

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		with relevant provisions of <i>WESM Rules</i> Chapter 2. 2.5.2 The data required to be provided to the <i>Central Registration Body</i> for registration as a <i>Supplier</i> , <i>Contestable Customer</i> , or <i>Retail Metering Services Provider</i> .	and procedures shall be consistent with relevant provisions of <i>WESM Rules</i> Chapter 2. <b><u>2.5.2 The requirements and procedures which Renewable Energy Suppliers, Retail Customers and Retail Metering Services Providers shall comply with to be allowed to participate in the Green Energy Option Program; and</u></b> <del>2.5.2</del> <b><u>2.5.3</u></b> The data required to be provided to the <i>Central Registration Body</i> for registration as a <i>Supplier</i> , <i>Contestable-Retail</i> <i>Customer</i> , or <i>Retail Metering Services Provider</i> .		For clarification with the CRB if <i>WESM Rules</i> Chapter 2 shall also be made applicable to GEOP End-Users since this is not mentioned in 2.5.2. For 2.5.2, it mentions “requirements and procedures xxx to be allowed to participate” in GEOP. Does this mean that the CRB	<b><u>Retail Electricity</u></b> <i>Suppliers,</i> <i>Contestable</i> <i>Customers</i> and <i>Retail Metering Services</i> <i>Providers</i> shall follow to enable registration in the <i>WESM</i> , which requirements and procedures shall be consistent with relevant provisions of <i>WESM Rules</i> Chapter 2.  <b><u>2.5.2 The requirements and procedures</u></b>		<b><u>which Renewable Energy Suppliers, Retail Customers and Retail Metering Services Providers shall comply with to enable registration in the WESM;</u></b>

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
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					will impose other requirements on top of what DOE and ERC already require? Or, similar to 2.5.1, these “requirements and procedures” pertain only to those needed to enable registration in the WESM?	<u>which Renewable Energy Suppliers, Retail Customers and Retail Metering Services Providers must comply with to enable registration in the WESM;</u>		
SUSPENSION, DE-REGISTRATION AND CESSATION OF MEMBERSHIP	2.6	The suspension, de-registration and cessation of the membership of <i>Suppliers</i> and <i>Contestable Customers</i> in the <i>WESM</i> shall be governed by the <i>WESM Rules</i> and <i>relevant Market Manuals</i> .	The suspension, de-registration and cessation of the membership of <i>Suppliers</i> and <del>Contestable</del> <u>Retail Customers</u> in the <i>WESM</i> shall be governed by the <i>WESM Rules</i> and <i>relevant Market Manuals</i> .	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary  <b>IEMOP:</b> Propose to include procedures for suspension, de-registration and cessation of participants that are registered with the CRB only to be defined in the Retail Manual for	<b>IEMOP:</b> <u>2.6.1</u> The suspension, de-registration and cessation of the membership of <i>Suppliers</i> , <u>Retail Metering Services Providers</u> and <i>Retail Customers</i> <u>that are</u>	<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary.	1. Adopted MERALCO’s comment. 2. Adopted IEMOP’s revision to 2.6.1 and inclusion of 2.6.2.

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					Registration Criteria and Procedures.	<u>registered</u> in the <i>WESM</i> shall be governed by the <i>WESM Rules</i> and relevant <i>Market Manuals</i> . <b>2.6.2 The cessation of the membership of Retail Customers that are registered with the <i>Central Registration Body</i> only shall be governed by a relevant <i>Market Manual</i>.</b>		
SCOPE OF CHAPTER 3	3.1.1	This chapter sets out the rules which govern operation of the market pertaining to the following and related matters: 3.1.1 Switching of <i>Suppliers</i> by <i>Contestable Customers</i> 3.1.2 Settlement of the transactions of <i>Suppliers</i> and <i>Contestable Customers</i> in the <i>WESM</i> ; and	This chapter sets out the rules which govern operation of the market pertaining to the following and related matters: 3.1.1 Switching of <i>Suppliers</i> by <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customers</i> 3.1.2 Settlement of the transactions of <i>Suppliers</i> and	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary		<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary.	1. Adopted MERALCO’s comment. 2. Approved as proposed.

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		xxx	<i>Contestable <b>Retail</b></i> <i>Customers in the WESM; and</i> xxx					
CONTESTABLE CUSTOMER TRANSACTIONS	3.2	CONTESTABLE CUSTOMER TRANSACTIONS	CONTESTABLE <b>RETAIL</b> CUSTOMER TRANSACTIONS	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary		<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary.	1. Adopted MERALCO’s comment. 2. Approved as proposed.
CONTESTABLE CUSTOMER TRANSACTIONS	3.2.1.1	3.2.1.1 Switching shall apply to the commercial transfer of a <i>Contestable Customer</i> from one <i>Supplier</i> to another, other than a transfer to a <i>Supplier of Last Resort</i> in case of a last resort event for which section 3.4 of this Chapter 3 shall apply.	3.2.1.1 Switching shall apply to the commercial transfer of a <i><del>Contestable</del> <b>Retail</b> Customer</i> from one <i>Supplier</i> to another, other than a transfer to a <i>Supplier of Last Resort</i> in case of a last resort event for which section 3.4 of this Chapter 3 shall apply.	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary  <b>IEMOP:</b> Propose to adopt procedures for transfer to SOLR as provided in the ERC GEOP Rules for both RCOA and GEOP participants. Section 3.fff of the ERC GEOP Rules	<b>IEMOP:</b> 3.2.1.1 Switching shall apply to the commercial transfer of a <i>Retail Customer</i> from one <i>Supplier</i> to another, <del>other than a</del> <b>including</b> transfer to a <i>Supplier of Last</i>	<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary.	1. Adopted MERALCO’s comment. 2. Approved as proposed.

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					state that Switching applies to the commercial transfer of a GEOP End-User from the NSP to an RE Supplier or SOLR and/or from one supplier to another.	<del>Resort in case of a last resort event for which section 3.4 of this Chapter 3 shall apply.</del> <b><u>provided that such switch complies with the applicable switch requirements.</u></b>		
Conditions for Customer Switching	3.2.1.3	3.2.1.3 A <i>Supplier</i> may submit a <i>switch request</i> to the <i>Central Registration Body</i> if the following conditions are met: a) A supply contract has been entered into between the <i>Supplier</i> and the <i>Contestable Customer</i> for which the <i>Switch request</i> is made; and b) There is an existing and valid wheeling service agreement with the relevant <i>Distribution Utility</i> or <i>Network Service Provider</i> and a metering services agreement with a registered Metering	3.2.1.3 A <i>Supplier</i> may submit a switch request to the <i>Central Registration Body</i> if <b><u>provided</u></b> the following conditions are met: a) A supply contract has been entered into between the <i>Supplier</i> and the <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customer</i> for which the <i>Switch request</i> is made; and b) There is an existing and valid wheeling service agreement with the relevant <i>Distribution Utility</i> or <i>Network Service Provider</i> and a <i>metering services</i> agreement	Generalized to Retail Customers to include GEOP End-Users	<b>MERALCO:</b> Same comment under 3.2.2.7 and Glossary		<b>Response to MERALCO:</b> We agree with MERALCO’s proposed changes to the definition of Retail Customer for inclusion in the Glossary.	1. Adopted MERALCO’s comment. 2. Approved as proposed.

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		Services Provider, covering the <i>Contestable Customer</i> . c) The <i>Contestable Customer</i> has no financial obligations with its <i>Network Service Provider</i> , in case of initial switch, or its incumbent <i>Supplier</i> .	with a registered Metering Services Provider, covering the <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customer</i> . c) The <del><i>Contestable</i></del> <b><i>Retail</i></b> Customer has no financial obligations with its Network Service Provider, in case of initial switch, or its incumbent Supplier; <b>and</b> <b>d) Any other conditions</b> <b>as may be specified in</b> <b>issuances by the DOE and</b> <b>the ERC.</b>					
Conditions for Customer Switching	(new)	(new)	<b><u>3.2.1.5 Only a Renewable Energy Supplier may submit a switch request to the Central Registration Body for Retail Customers that wishes to participate in the Green Energy Option Program.</u></b>	This is to clarify that only Renewable Energy Supplier may only switch Retail Customers that are not Contestable Customers under the GEOP.	<b>MERALCO:</b> While the term “Retail Customer” (which includes both Contestable Customer and GEOP End-User) is used, this provision is specifically applicable to GEOP End-Users. However, since defined term “Retail Customer” is used,	<b>MERALCO:</b> <b><u>3.2.1.5 Only the prospective Renewable Energy Supplier may submit a switch request to the Central Registration Body for GEOP End-Users that wishes to participate in the</u></b>	<b>MERALCO:</b> Agree with the proposed revision. Please note that only registered Suppliers may have an account in the <b>CRSS</b> and are allowed to submit a switch request. It is clearly stated in the <b>rules</b> that the	Adopted MERALCO’s revision.

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					there is tendency that the provision will be interpreted as being applicable to both Contestable Customer and GEOP End-User. It is suggested to use the term “GEOP End-User” instead, for clarity. GEOP Rules provides that only the <b>prospective</b> RE Supplier can submit a switch request, as switching can be a from the NSP to an RE Supplier, and from one RE Supplier to another). We suggest to make the same distinction here, to align with the GEOP Rules.	<b><u>Green Energy Option Program.</u></b>	CRB is required to undertake <b>evaluation prior to approval of a switch request</b> and that the switch date is contingent on the fulfillment of all requirements. As such, the initially proposed switch date may not be followed. As it is, the Supplier who is responsible for ensuring all requirements are completed prior to submission of the switch request at Day 1 of the 7-day switching timeline, the RMSPs could also establish measures with	

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					During the February 2022 switching period, Renewable Energy Suppliers were able to create numerous MIRF switch requests in the CRB’s Central Registration and Settlement System (CRSS), which consequently required Retail Metering Services Providers to prepare and upload MIRF and supporting documents for those Retail Customers intending to switch. However, upon CRB assessment, there were no successful GEOP		the Suppliers to ensure it has exercised due diligence in complying with other requirements prior to requesting creation of MIRFs.  Subject to further clarification from IEMOP process owner during RCC meeting	

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					switchers for February 2022. For process efficiency, there should be measures in the CRSS that will allow the creation of a switch request only by Renewable Energy Suppliers who are licensed, with GEOP permits, are registered in WESM, and with complete switch requirements. This is to manage the expectations of Retail Customers on switch dates and allow Retail Metering Services Providers to anticipate volume of actual switchers and prioritize the preparation for	<b>NREB-TWG:</b> Section 16.1 of ERC GEOP Rules clearly state that it is the prospective <b>RE Supplier that shall submit the switch request.</b> A GEOP End-User with multiple suppliers should nominate a primary RE Supplier to be the single point of contact for the CRB, NSPs and all other service providers pursuant to Section 3.00 of the ERC GEOP Rules.		

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					those with complete requirements.  <b>NREB-TWG:</b> How can this be reconciled with the ERC GEOP rules providing that GEOP end-users under the multiple billing scheme shall submit their own switch request?	Subject to further clarification from IEMOP process owner during RCC meeting		
Procedures for Switching	3.2.2.1	3.2.2.1 Once all the conditions set forth in Clause 3.2.1.3 are met, the new <i>Supplier</i> shall submit the <i>switch request</i> to the <i>Central Registration Body</i> not later than seven (7) working days prior to the proposed effective date. The <i>switch request</i> shall include an attestation duly signed by:	3.2.2.1 Once all the conditions set forth in Clause 3.2.1.3 are met, the new <i>Supplier</i> shall submit the <i>switch request</i> to the <i>Central Registration Body</i> not later than seven (7) working days prior to the proposed effective date. The <i>switch request</i> shall include an attestation duly signed by:	Changed to Retail Customers in order to provide a general term for Contestable Customers and GEOP End - Users which are not contestable Customers. Note that ERC Resolution No. 8,	<b>TC:</b> What is the prescribed procedure for cases when the exact provisions are already presented in other manuals or issuances? In this case, these procedures are		<b>Response to TC:</b>  We propose to still include the provisions in the Retail Rules for easier reference of readers.	See the comment boxes.  (end of 193 <sup>rd</sup> RCC Meeting)

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		<p>a) the <i>Supplier</i> and the <i>Contestable Customer</i> of the existence of a retail supply contract between the two parties, and the term of the retail supply contract including the effectivity dates;</p> <p>b) the <i>Supplier</i> or the <i>Contestable Customer</i>, as applicable, and the relevant <i>Distribution Utility</i> of the existence of a valid wheeling service agreement covering the <i>Contestable Customer</i>;</p> <p>c) the <i>Supplier</i> or the <i>Contestable Customer</i>, as applicable, and the registered <i>Retail Metering Services Provider</i> of the existence of a metering services agreement covering the <i>Contestable Customer</i>; and</p> <p>d) the incumbent <i>Supplier</i> or, if not served by a <i>Supplier</i>, the relevant <i>Distribution Utility</i></p>	<p>a) the <i>Supplier</i> and the <b><i>Retail Customer</i></b> of the existence of a retail supply contract or <b><i>any equivalent</i></b> between the two parties, and the term of the retail supply contract including the effectivity dates;</p> <p>b) the <i>Supplier</i> or the <b><i>Retail Customer</i></b>, as applicable, and the relevant <i>Distribution Utility</i> of the existence of a valid wheeling service agreement covering the <i>Contestable Customer</i>;</p> <p>c) the <i>Supplier</i> or the <b><i>Retail Customer</i></b>, as applicable, and the registered <i>Retail Metering Services Provider</i> of the existence of a metering services agreement covering the <del><i>Contestable</i></del> <b><i>Retail Customer</i></b>; and</p>	<p>Series of 2021 requires submission of copies of agreements instead of attestations. IEMOP proposes to retain the current requirements to allow seamless integration of the GEOP for both IEMOP and the market participants.</p> <p>IEMOP also retained the timeline for correction of deficiencies on metering requirements to 15 working days instead of the 5 working days</p>	<p>already prescribed in the ERC issuances.</p> <p><b>APC:</b> CRB should notify the Supplier within working hours, (anytime between 8am and 5pm), the status of the submitted documents. Beyond 5:00 PM shall be deemed to have been sent or received on the first working hour of the next working day.</p> <p><b>MERALCO:</b> For item a), it mentions “the <i>Supplier</i> and the <b><i>Retail Customer</i></b> of</p>	<p><b>MERALCO:</b> (a) the <i>Supplier</i> and the <b><i>Retail Customer</i></b> of the existence of a</p>	<p><b>Response to APC:</b></p> <p>Not feasible for CRB due to volume of switch requests being processed especially during bulk submissions or simultaneous submissions by various suppliers (RCOA and GEOP).</p> <p>Subject to further clarification from IEMOP process owner during RCC meeting</p>	

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		<p>that the <i>Contestable Customer</i> has no outstanding balance.</p> <p>The <i>Supplier</i> or the <i>Contestable Customer</i> registering as a Direct WESM Member shall also submit the projected metering quantities and the percentage that will be purchased from the WESM by the Contestable Customer, as applicable.</p> <p>The <i>Central Registration Body</i> shall immediately evaluate the completion of the abovementioned requirements, including verification of information of the <i>Contestable Customer</i> as submitted by the Distribution Utilities under Clause 2.3.1.1, and it shall notify the <i>Supplier</i> and the <i>Contestable Customer</i>, as applicable, on the status and further requirements, if any, such as prudential requirement, for the approval</p>	<p>d) the incumbent <i>Supplier</i> or, if not served by a <i>Supplier</i>, the relevant <i>Distribution Utility</i> that the <b><u>Retail Customer</u></b> has no outstanding balance.</p> <p><b><u>If the switch request is for a Retail Customer participating in the Green Energy Option Program, the Supplier shall submit to the Central Registration Body documents as required in Section 16.2 under the ERC Resolution No. 08, Series of 2021.</u></b></p> <p>The <i>Supplier</i> or the <i>Contestable Customer</i> registering as a <i>Direct WESM Member</i> shall also submit the projected metering quantities and the percentage that will be purchased from the <i>WESM</i> by the <i>Contestable Customer</i>, as applicable.</p>	<p>provided in ERC Resolution No. 8, Series of 2021 for the same reason.</p>	<p>the existence of a retail supply contract or <b><u>any equivalent</u></b> between the two parties, and the term of the retail supply contract including the effectivity dates; xxx”</p> <p>It is noted, however, that “retail supply contract” is customarily used for contracts between RES and CC and may therefore exclude that executed by a GEOP End-User and RE Supplier. Instead, GEOP Rules of ERC provides GEOP Supply Contract as</p>	<p>retail/<b><u>GEOP</u></b> supply contract or <b><u>any equivalent thereof</u></b> between the two parties, and the term of the retail supply contract including the effectivity dates;</p> <p>xxx</p> <p>The <i>Supplier</i> or the <b><u>Contestable Retail Customer</u></b> registering as a <i>Direct WESM Member</i> shall also submit the projected metering quantities and the percentage that will be purchased from the <i>WESM</i> by the <b><u>Contestable</u></b></p>	<p><b>Response to MERALCO:</b></p> <p>We agree with MERALCO’s proposed revision on Clause 3.2.2.1a). Our proposed revision to our original proposal may already address MERALCO’s concerns on requirements for GEOP switch requests.</p> <p>The Supplier is responsible for ensuring that all requirements are completed prior to submission of the switch request on Day 1 of the 7-</p>	

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		of switch request within two (2) working days from the receipt of the switch request. All shortcomings by the <i>Supplier</i> and the <i>Contestable Customer</i> shall be rectified within two (2) working days from the receipt of the <i>Central Registration Body’s</i> notice.	The <i>Central Registration Body</i> shall immediately evaluate the completion of the abovementioned requirements, including verification of information of the <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customer</i> as submitted by the <i>Distribution Utilities</i> under Clause 2.3.1.1, and shall notify the <i>Supplier</i> and the <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customer</i> , as applicable, on the status and further requirements, if any, such as prudential requirement, for the approval of switch request within two (2) working days from the receipt of the switch request. All shortcomings by the <i>Supplier</i> and the <del><i>Contestable</i></del> <b><i>Retail</i></b> <i>Customer</i> shall be rectified within two (2) working days from the receipt of the <i>Central Registration Body’s</i> notice.		one executed between GEOP End-User and RE Supplier.  Thus, the suggested wording for (a) is proposed.  <b><u>On the requirements:</u></b>  For clarification of IEMOP’s rationale that “it proposes to maintain the current requirements” while noting that “ERC Resolution No. 8, Series of 2021 requires submission of copies of agreements instead of attestations.”	<b><i>Retail</i></b> <i>Customer</i> , as applicable.	day switching timeline.  Kindly note that IEMOP has issued advisories to provide guidance to concerned entities with respect to pre-switching activities <a href="https://www.iemo.p.ph/geop/iemop-geop-bulletin-no-3-2/">(https://www.iemo.p.ph/geop/iemop-geop-bulletin-no-3-2/)</a>  IEMOP welcomes any alternative proposal aimed at improving and streamlining the switching process. We are open to any proposal of a workable pre-	

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					<p>Does this statement pertain to GEOP End-Users (meaning requirements for GEOP End-User follows that for Contestable Customers, in that mere attestation of these agreements will suffice) or Contestable Customers (meaning there is no change for requirements in case of Contestable Customers?)</p> <p>If for GEOP End-Users, please note that 3<sup>rd</sup> to last paragraph of Section 3.2.2.1. mentions submission of</p>		<p>switching timeline based on their experience with RCOA and GEOP and will carefully evaluate the same.</p> <p>Subject to further clarification from IEMOP process owner during RCC meeting</p>	

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					<p>documents required under GEOP Rules.</p> <p>It is strongly proposed to <b>SEPARATE</b> the Attestation requirement for Contestable Customers from Certifications requirement for GEOP customers. Implementation of the Attestation requirement for both Retail Customers <b>imposes unnecessary cost for relevant parties due to additional notarial activities and logistical costs and creates potential delay in</b></p>			

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					<p><b>switching activities</b> when copies of contracts were already submitted along with switch requests.</p> <p><b>For seamless integration with least cost and greater operational efficiency, we strongly suggest to instead adapt the <i>GEOP Switch Request Form</i>, which allows submission of signed Certifications from NSP/MSP/DU and Retail Customers.</b></p>			

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					<p><b><u>On the pre-switching timeline:</u></b></p> <p>Given that the timing of MIRF uploading and submission is dependent on Suppliers’ creation of MIRF via CRSS, which is consequently accomplished towards Day 1 of the CRB’s seven (7)-working day timeline, consistent and thorough communication is required between DUs and Suppliers to ensure successful registration of Retail Customers.</p>			

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					In view of this, MERALCO coordinated with concerned Suppliers to identify and resolve potential concerns, and update processes. An reasonable date (i.e., 6th day of the switching month, or the next working day, which is around 20 calendar days before the intended switching date) was set for the creation of an MIRF request, as a pre-switching requirement, if the intended switch effectivity date is on the 26th day of a given month, following the seven (7)-working day			

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					<p>timeline of the CRB, to timely facilitate upload of MIRF and avoid delays in submission.</p> <p>We note that the current pre-switching timeline does not cover the MIRF request creation by the Suppliers in the CRSS, which should be emphasized as a crucial step in enabling RMSPs to proceed with the required upload and MIRF submission.</p> <p>Setting a 7-working day timeline only for the CRB’s portion to assess</p>			

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Retail Rules								
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					<p>and approve is not reflective of the entire switching process. It is deemed prudent to streamline the entire process, together with all concerned participants, to accomplish the envisioned shortening of the complete switching process</p> <p>We would like to propose for IEMOP to set a defined pre-switching timeline not only for the CRB, but also for the Suppliers and DUs/RMSPs, so that this will serve as strict guidance to participants to ensure seamless</p>			

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ANNEX C – Matrix of Proposed Amendments with Comments and Responses

Retail Rules								
Title	Section	Provision	Proposed Amendment (PEM Board-approved as Urgent Amendment)	Rationale	Comment	Proposed Wording based on Comment	Original Proponent’s Response	RCC Decision
					switching of Retail Customers.  <b>IEMOP:</b> We retain our same proposal to harmonize Customer Switching procedures for both RCOA and GEOP participants and to adopt the procedures as approved by DOE in DC2021-06-0012 (Amendments to WESM Rules, Retail Rules and Manuals on Provisions to Promote Participation in Retail Competition)  For transparency, this proposed	<b>IEMOP:</b> 3.2.2.1 Once all the conditions set forth in Clause 3.2.1.3 are met, the new <i>Supplier</i> shall submit the switch request to the <i>Central Registration Body</i> not later than seven (7) working days prior to the proposed effective date. The switch request shall <b><u>be electronically filled out and shall</u></b> include an attestation duly signed by <b><u>a confirmation from authorized representatives of the following:</u></b>		

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					<p>revision is <b>in conflict with Clause 16.2 of the ERC GEOP Rules.</b></p> <p>In addition, we propose to transition to <b>electronic processing and certification of switch requests</b> to streamline the switching process for both RCOA and GEOP.</p> <p>If approved, implementation of this provision shall entail system enhancements which is dependent on budget availability. Assuming the budget is available, procurement,</p>	<p>a) the <i>Supplier</i> and the <i>Retail Customer</i> of the existence of a retail supply contract or any equivalent between the two parties, and the term of the retail supply contract including the effectivity dates;</p> <p>b) the <i>Supplier</i> or the <i>Retail Customer</i>, as applicable, and the relevant Distribution Utility <b><u>or Network Service Provider</u></b> of the existence of a valid wheeling service agreement covering the</p>		

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					development, testing and software certification will take <b>at least 9 months</b> (initial estimate).	Contestable Customer;  c) the <i>Supplier</i> or the <i>Retail Customer</i> , as applicable, and the registered <i>Retail Metering Services Provider</i> of the existence of a <b>valid</b> metering services agreement covering the <i>Retail Customer</i> ; and d) the incumbent <i>Supplier</i> or, if not served by a Supplier, the relevant <i>Distribution Utility</i> that the <i>Retail Customer</i> has no		

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						<p>outstanding balance.</p> <p>If the switch request is for a <i>Retail Customer</i> participating in the <i>Green Energy Option Program</i>, the <i>Supplier</i> shall submit to the <i>Central Registration Body</i> documents as required in Section 16.2 under the ERG Resolution No. 08, Series of 2021.</p> <p><b><u>The Central Registration Body may require submission of appropriate documentation</u></b></p>		

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						<p><u>to ensure the authorized representatives have authority to represent their respective organizations.</u></p> <p>The <i>Supplier</i> or the <i>Contestable Customer</i> registering as a <i>Direct WESM Member</i> shall also submit the projected metering quantities and the percentage that will be purchased from the <i>WESM</i> by the <i>Contestable Customer</i>, as applicable.</p> <p>The <i>Central Registration Body</i></p>		

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Retail Rules								
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						shall immediately evaluate the completion of the abovementioned requirements, including verification of information of the <i>Retail Customer</i> as submitted by the <i>Distribution Utilities</i> under Clause 2.3.1.1, and shall notify the <i>Supplier</i> and the <i>Retail Customer</i> , as applicable, on the status and further requirements, if any, such as prudential requirement, for the approval of switch request within two (2) working days from the receipt		

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					<b>NREB-TWG:</b> IEMOP’s GEOP Bulletin 3.2 under 4. Switch Request Proper (b) states that the CRB shall only accept switch requests within the first 15 calendar days of a month.	of the switch request. All shortcomings by the Supplier and the <i>Retail Customer</i> shall be rectified within two (2) working days from the receipt of the <i>Central Registration Body’s</i> notice.		

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					This limits the period for switching and is contrary to the provision that allows the submission of switch requests up to 7 working days prior the proposed effective date.			