

MEETING MINUTES

Subject/Purpose : 195th Rules Change Committee (Regular) Meeting
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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	Cherry A. Javier	Member, 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	Michelle S. Tuazon	Member (Alternate), Generation Sector	RCC
11	Ryan S. Morales	Member, 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	Henry V. Dela Cruz	Member (Alternate), System Operator	RCC
18	Isidro E. Cacho, Jr.	Member, Market Operator	RCC
19	Elvin Hayes E. Nidea	Chief Governance Officer	PEMC
20	John Mark S. Catriz	RCC Secretariat	PEMC
21	Karen A. Varquez	RCC Secretariat	PEMC
22	Divine Gayle C. Cruz	RCC Secretariat	PEMC
23	Dianne L. De Guzman	RCC Secretariat	PEMC
24	Kathleen R. Estigoy	RCC Secretariat	PEMC
25	Kevin John Y. Dela Cuesta	Technical Committee Secretariat	PEMC
26	Aldrin W. Reyes	Corporate Planning and Communications	PEMC
27	Ria Crizette B. Alegre	Office of the Chief Governance Officer	PEMC
28	Melanie Papa	Observer	DOE
29	Mari Josephine C. Enriquez	Observer	DOE
30	Jhannelyn D. Marasigan	Observer	DOE
31	Franz Xyrlo I. Tobias	Observer	ERC
32	Sheryll M. Dy	Proponent	IEMOP
33	Lilibeth Grace L. Vetus	Proponent	IEMOP
34	Edward I. Olmedo	Proponent	IEMOP
35	Jenny I. Jalandoni	Proponent	IEMOP
36	Karen Anne H. Siruma	Proponent	IEMOP

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37	Ruziel Larmae T. Gimpaya	Proponent	IEMOP
38	Katrina A. Garcia-Amuyot	Proponent	IEMOP
39	Arjon B. Valencia	Proponent	IEMOP
40	Ermelindo R. Bugaoisan, Jr.	Proponent	NGCP
41	Ryan Jasper M. Villadiego	Proponent	NGCP
42	Josephine S. Quiaem	Proponent	NGCP
43	Mikaela Victoria Perez	Proponent	NGCP
44	June C. Pascual	Proponent	NGCP
45	Francis George T. Lomaad	Proponent	NGCP
46	Christian J. Del Rosario	Proponent	NGCP
47	Joselito C. Quilala	Proponent	NGCP
48	Neil Martin E. Modina	Proponent	NGCP
49	Antonio O. Mercado	Commenter	MEI/PEI
50	Richard O. Arcenal	Commenter	SPC/SIPC
51	Laudy Lyn Oropesa Calde	Commenter	SPC/SIPC
52	Krizzia Alyanna G. Angeles	Commenter	SPC/SIPC
53	Ana Reduta	Commenter	APC
54	Bryan Albert Castro	Commenter	APC
55	Vida Joan Toque	Commenter	SNAP
56	Gian Gutierrez	Commenter	NREB
57	Julie B. Dulce	Commenter	MERALCO
58	Genevee A. Rellores	Commenter	MERALCO
59	Katherine Ann C. Perez	Commenter	MERALCO
60	Angelica Diane B. Monteza-Sy	Commenter	MERALCO
61	Roma Angela P. Hofilena	Commenter	MERALCO
62	Ma. Leticia L. Sapina	Commenter	MERALCO
63	Ma. Elisha S. Eloriaga	Commenter	MERALCO
64	Jed Angelo G. Tetangco	Commenter	MERALCO
65	Aira Juana C. Arce	Commenter	MERALCO
66	Jesus I. Santiago Jr.	Commenter	MERALCO

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I. Call to Order	a. The meeting was conducted via Microsoft Teams and was called to order at 9:02 AM. b. The meeting was presided by Ms. Concepcion I. Tanglao (Chairperson/Independent).
II. Determination of Quorum	All principal members and 2 alternate members were present.
III. Adoption of Agenda	The agenda was approved, as revised.
IV. Approval of Minutes of Previous Meeting - 192 nd Regular Meeting, 18 March 2022	The minutes of the meeting was approved, as revised. The deletion of the discussion regarding the net operating margin from the draft minutes was approved. The concept of net operating margin in relation to grid alert levels was further discussed under Item V. 5.2 (SSRG Proposal).
V. Matters Arising from Previous Meeting	
5.1. Continuation of Deliberation on the Proposed General Amendments for the Implementation of Green Energy Option Program (GEOP)	<p><u>Presenter:</u> Karen Anne H. Siruma (IEMOP) Kathleen R. Estigoy (Secretariat)</p> <p><u>Action Requested:</u> For endorsement to the PEM Board and approval to affix e-signature</p> <p><u>Material/s:</u> Annex A1 – Partial matrix of Proposed Amendments to the Retail Manual on Registration Criteria and Procedures Annex A2 – Partial matrix of Proposed New Retail Manual on GEOP Procedures Annex A3 – Additional Changes to the Retail Rules</p> <p><u>Proceedings:</u></p> <ul style="list-style-type: none"> • Arising from the ERC’s position (per ERC letter to PEMC dated 02 November 2021) for IEMOP to strictly implement the ERC GEOP Rules, IEMOP withdrew its proposed changes to provisions pertaining to the following processes under the Retail Manual on GEOP Procedures: <ol style="list-style-type: none"> a) Switching to a Renewable Energy Supplier b) Customer Relocation c) Transfer to a Supplier of Last Resort

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	<p>d) Termination of Supply e) Disconnection and Reconnection f) Metering g) Settlement of GEOP End-Users with their Renewable Energy Suppliers h) Prudential Requirement Settlement Information</p> <p>The RCC requested IEMOP to identify and discuss the affected provisions during the line-by-line review of the proposal.</p> <ul style="list-style-type: none"> • The RCC continued the deliberation starting with the Retail Manual on Registration Criteria and Procedures. IEMOP proposed including new provisions (Sections 2.1 to 2.8) to establish procedures for the de-registration and cessation of membership of participants registered in the WESM and participants registered with the Central Registration Body (CRB) only. <p>MERALCO recommended the following changes to IEMOP's proposed new provisions:</p> <ul style="list-style-type: none"> ○ Amend Section 2.4, which pertains to cessation of registration of Contestable Customers (CC) to revert to the captive market, with the applicable ERC issuance, noting that reverting to captive market requires ERC approval per ERC Resolution No. 2, Series of 2008 ○ In Sections 2.1 and 2.3, replace the term 'disconnection' with 'termination' since for Distribution Utilities (DUs), the former means temporarily cutting-off CCs due to non-payment of arrears, but still not leading to termination of service. In the context of 2.1 which pertains to cessation, 'termination' may be more appropriate. <i>(Response: IEMOP is amenable with the change)</i> ○ On Section 2.5 pertaining to effectivity of cessation, add "subject to completeness of requirements", for clarity <i>(Response: IEMOP is amenable with the change)</i>. ○ On Section 2.8, provide that a CC who was terminated but wish to register again with the CRB must satisfy eligibility requirements, aside from securing approval of switch request by its new Supplier. <ul style="list-style-type: none"> • Mr. Fortich (CEBECO III) and Mr. Morales (MERALCO) commented that allowing GEOP End-Users to switch in and out

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	<p>of the captive market will affect DUs' projecting/forecasting and contracting. Ms. Siruma (IEMOP) explained that GEOP End-Users may only revert to the captive market once every 12 months per ERC GEOP Rules.</p> <ul style="list-style-type: none"> • In reference to Section 3.3.3 in the proposed Retail Manual on GEOP Procedures pertaining to documentary requirements for switch requests, Ms. Reduta (APC) commented that Distribution Wheeling Service Agreement (DWSA) stipulations already cover metering services agreements and there is usually no separate document on metering services agreements. Ms. Amuyot (IEMOP) clarified that prospective GEOP End-Users may submit either metering services agreement or connection agreement, whichever is available, provided that there is formal advice from the concerned party to the CRB stating that the document being submitted (either metering services or connection agreement) already covers the information in the unavailable document. • NREB-TWG commented that application requirements and timelines for GEOP End-Users, as prescribed in the ERC GEOP Rules, need to be simple like for RCOA Contestable Customers noting that GEOP End-Users are the smaller ones when it comes to peak demand (i.e., at least 100kWh). If the requirements are harder to comply with, these could discourage Customers from participating in the GEOP. <p>Ms. Siruma (IEMOP) responded that IEMOP has elevated those same comments with the ERC last year, but the ERC reiterated strict compliance with the ERC GEOP Rules.</p> <ul style="list-style-type: none"> • Regarding IEMOP's timeframe in which they accept switch requests only within 1st to 15th day of the month due to manpower and system limitations, Ms. Javier (APC) commented that such constraints should not be the basis for establishing procedures. • Since IEMOP will be implementing the ERC GEOP Rules as it is now, resulting from the response-letter from the ERC enjoining IEMOP to comply with said GEOP Rules, NREB-TWG agreed to formally send DOE a letter to raise its and some stakeholders' implementation and compliance concerns.

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	<ul style="list-style-type: none"> Additional amendments to the Retail Rules were discussed for consistency with the ERC GEOP Rules (see Annex A3). On the matter of confidentiality of CC's information in relation to the Data Privacy Act, which the RCC considered in the previous meeting and agreed with IEMOP to no longer publish the list of CCs in the CRB website, Ms. Rivera (TeaM Energy) suggested retaining said list public since Suppliers do use those CC information for planning, project scoping, and industry studies. <p>Atty. Vetus (IEMOP) explained that the National Privacy Commission (NPC) issued an advisory opinion (NPC Advisory No. 2020-0052) in response to ERC's inquiry stating that there must be legitimate purpose for disclosing CC information. Atty. Vetus further stated that while the Retail Rules require publication of certain CC information, the ERC GEOP Rules does not, so IEMOP exercised diligence and inquired from NPC on this matter. IEMOP is awaiting NPC's advisory opinion. Atty. Vetus clarified that IEMOP is currently only publishing Retail Customers and GEOP End-Users who are companies/corporations, not individuals. She relayed that there are individuals who participate as Retail Customers, especially with further lowering of eligibility threshold, and that their personal information is protected under the Data Privacy Act.</p> <p>On the question on how one defines 'legitimate purpose', Atty. Fernando (Independent) opined that this is established on a case-to-case basis. Normally if the government requires the conduct of a certain activity (e.g., industry study) to which protected information is necessary, the disclosure of said information can be considered 'legitimate purpose'.</p> <p>Atty. Morillos (Independent) commented that the policies of transparency and confidentiality clash in this case. It is therefore important to identify which information a Customer has consent to disclose/volunteer and which ones should be made private. There may also be a need to determine the minimum information that the market in general may need to be able to function or operate.</p> <p>RCC agreed to retain Section 5.3 of the Retail Manual on Disclosure and Confidentiality of CC Information, which</p>

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	<p>supports maintaining the current publication of CC and GEOP End-User information with due consideration of the CRB's practice of non-publication of individual retail market participants while awaiting final guidance from the NPC.</p> <ul style="list-style-type: none"> • The following additional revisions from IEMOP were discussed to align the provisions with the ERC GEOP Rules (see Annexes A1 and A3): <ul style="list-style-type: none"> A. WESM Manual on Registration Criteria and Procedures <ul style="list-style-type: none"> - Notification on Cessation (Section 5.2.1.1) <p><i>5.2.1.1. A WESM member wishing to cease to be registered in any one or more of the categories in which it is registered shall notify the Market Operator, System Operator and the Network Service Provider in writing. <u>However, a WESM Member who registered as a Retail Customer, Supplier, Retail Metering Service Provider or a Supplier of Last Resort is no longer required to notify the System Operator.</u></i></p> B. Retail Rules <ul style="list-style-type: none"> a) Prudential Requirements (Section 3.2.2.4) b) Notification on Standard Metering Requirement (Section 3.2.2.6) c) Customer Relocation – Sections 3.2.3.1 to 3.2.3.11 d) Termination of Supplier Service by the Supplier – Sections 3.2.5.1 to 3.2.5.6 C. Retail Registration Manual <ul style="list-style-type: none"> - Reversion to Captive Customer (Section 2.4) to harmonize with Clause 2.6 of ERC Resolution No. 2 Series of 2008 <p><u>Agreement:</u></p> <p>The RCC provisionally approved the proposal, subject to discussion of the following pending items in the next RCC meeting:</p>

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	<p>a) MERALCO's proposed wording for Retail Rules Clause 3.2.5.6 (Notice of Termination)</p> <p>b) APC's proposed wording in Retail Manual on GEOP Procedures Section 3.3.5 (Switching to a Renewable Energy Supplier)</p> <p>c) Pending items for clarification with ERC:</p> <ol style="list-style-type: none"> i. Submission of Metering Service Agreement under Section 3.3.3 (d) of the Retail Manual on GEOP Procedures ii. The effective date of termination of Distribution Wheeling Services Agreement (DWSA) <p>Corresponding draft resolution will be submitted for approval next meeting.</p>
<p>5.2. Proposed Amendments to the WESM Rules and WESM Manuals on System Security and Reliability and Dispatch Protocol for the Implementation of the Reserve Market (ORCP-WR-WM-21-13)</p> <ul style="list-style-type: none"> • Continuation of Deliberation of Comments and Proponent's Response 	<p><u>Presenter:</u> Kathleen R. Estigoy (Secretariat)</p> <p><u>Action Requested:</u> For endorsement to the PEM Board and approval to affix e-signature</p> <p><u>Materials:</u></p> <ul style="list-style-type: none"> • Annex B1 – Partial Matrix of Proposed Amendments to the WESM Manual on System Security and Reliability Guidelines • Annex B2 – Matrix of Proposed Amendments to the WESM Rules • Annex B3 – Matrix of Proposed Amendments to the WESM Manual on Dispatch Protocol <p><u>Proceedings:</u></p> <ul style="list-style-type: none"> • <i>On using net operating margin as basis for alert notices</i> <p>The RCC resumed its deliberation in Section 5.1 of the SSRG Manual, which pertain to conditions to consider that the grid is in Normal State.</p> <p>NGCP posited that Normal State condition of the grid must not depend, among others, on the availability of reserves but on the Net Operating Margin. The grid is said to be Normal if the Net Operating Margin is above the capacity of the largest unit online. Mr. Rosales (NGCP) explained that if the grid condition depends on the level of reserves, it is possible that the System Operator will need to issue Alerts every 5-minute dispatch</p>

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	<p>interval. Net Operating Margin (or Net Operating Reserve) is total capacity less demand less regulating reserve capacity. In real-time, the System Operator looks at the Net Operating Margin to determine if, say, a Yellow or Red Alert should be issued. For example, if the capacity of the largest unit online is 600 MW and the Net Operating Reserve is equivalent to 600 MW, then there is available capacity to replace that unit should it trip. However, the replacement 600 MW capacity is not all considered ancillary/reserves. They may be tapped to be must-run units (MRUs).</p> <p>Mr. Claudio (MEI/PEI) commented that the concept of net operating reserve is not in the old version of the Philippine Grid Code (PGC 2007) nor in the current one (PGC 2016). Further, NGCP's proposed usage of net operating reserve to determine grid condition is not in the current PGC. The issue is if it is appropriate to use the provision from the old PGC without approved application for derogation from the ERC. He further explained that the SO is mandated to buy contingency reserves from service providers. But since there is a lack of service providers that offer such needed capacity, the SO cannot contract out the appropriate level of reserves.</p> <p>Mr. Rosales reiterated that the SO cannot comply with what the current PGC prescribes now. The SO's position is that the use of net operating reserve as basis for determining grid condition is the most realistic approach and is what is currently being applied.</p> <p>Mr. Bugaoisan (NGCP) pointed out that the current PGC still does not have implementing rules and regulation, and that the DOE issued a circular mandating the use of previous terms for the reserve categories, which may even further cause confusion when it comes to implementation.</p> <p>Mr. Rosales likewise explained when the SO would implement manual load dropping. Net operating margin is the excess capacity of supply after demand has been met. Net operating margin may be a combination of ancillary and non-ancillary reserves. For example, total demand is 10,000 MW and net operating reserve is 500 MW. This means that total capacity is 10,500 MW. If the capacity of the largest unit online is 600 MW and is properly generating, then manual load dropping is not</p>

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	<p>necessary. But if the SO sees that there will already be a supply deficit if the largest unit online trips, it will issue Yellow Alert. If this scenario happens, the SO shall implement manual load dropping to balance supply and demand. The SO allocates regulating reserve to maintain the right frequency in the grid. This example illustrates the current practice.</p> <ul style="list-style-type: none"> <p><i>On the interim policy regarding ancillary services</i></p> <p>Ms. Javier informed that the DOE actually issued a transitory circular, DOE DC2019-12-0018, pending the full implementation of the current PGC. This DOE issuance is considered the interim policy regarding reserves and has been in fact used as basis for subsequent DOE circulars pertaining to the implementation of the Reserve Market, including the continued contracting of ancillary services. However, Mr. Rosales pointed out that the subject DOE circular does not have provision regarding issuance of alerts notices.</p> <p><i>On new reserve categories and alert notices</i></p> <p>Per F.8 of the PGC 2016, the new reserve categories, i.e., primary, secondary, and tertiary reserve, correspond to the old categories, namely, regulating, contingency, and dispatchable reserve, respectively.</p> <p>Ms. Javier likewise pointed out that if the SO, in accordance with the current PGC (G.O. 6.4.1.1) is unable to contract the required level of reserve categories, then it must already issue the appropriate alert notice.</p> <p>Mr. Rosales explained that the alert notice guidelines provided in G.O. 6.4.1.1 may not reflect the true capacity of the grid in a given time. There may be instances when even if the highest unit online trips, but there are still other sources of capacity or operating reserves that may be tapped to replace the lost capacity but said sources are not necessarily considered ancillary service providers, then issuing an alert notice is not necessary. These sources of needed capacity may be considered as must run units and will be compensated as such. If the SO issues alert notices unnecessarily then it might give a</p>



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	<p>wrong signal to investors that the Philippine power supply is not stable.</p> <p>Mr. Claudio clarified that the purpose of primary or contingency reserve is not to prevent manual load dropping but to prevent automatic load dropping. If a generator trips and grid frequency sharply declines, the contingency reserve must be able to arrest the frequency dip and stabilize the grid frequency. He further explained that Yellow Alert does not intend to notify grid users of an impending brownout but to give notice to grid users that if there is tripping of a generator, especially a large one, it would result in automatic load dropping.</p> <ul style="list-style-type: none"> <p><i>On possible ways forward</i></p> <p>Since the SO cannot comply with the current reserve requirement levels (primary, secondary, and tertiary reserves), and at the same time can no longer apply the requirements of the previous PGC, Mr. Rosales agreed with Atty. Morallos' recommendation for NGCP to write to ERC explaining why it cannot comply with the current PGC.</p> <p>Atty. Morallos stated that either the SO secures clearance from ERC allowing the use of a process that is not in the PGC (i.e., being non-compliant), or the ERC should issue a provisional IRR.</p> <p><i>On the proposed condition for normal state regarding loading levels of transmission lines and substation equipment (Section 5.1(e) of SSRG Manual)</i></p> <p>Ms. Javier inquired if describing the grid at Normal State when the loading levels of transmission lines and equipment is below 90% of the operational thermal limit capacity could result to more frequent congestion that may limit generators to run.</p> <p>Mr. Bugaoisan responded that the MO's modeling of the transmission lines and equipment will be the same such that they are modelled at 100% of the operational thermal limit capacity. The intention is for the system to be put on alert if the loading level goes beyond 90% of the operational thermal limit capacity. Mr. Bugaoisan added that the SO will redispatch to</p>



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	<p>maintain the 90% loading levels since this is in line with the PGC.</p> <p>Mr. Rosales expounded the loading levels between 90% and 100% of the thermal limit capacity is considered critical loading. This means that the SO should be on alert to prevent possible line tripping that could have a cascading effect compromising grid security.</p> <p>Ms. Javier suggested to define normal state as having 100% loading levels since defining normal state as having loading levels below 90% of the thermal limit capacity may have an effect on price.</p> <p>Mr. Cacho (IEMOP) commented that the 90% loading level requirement was likely intended to maintain the reliability of the grid. If the 90% threshold is frequently reached, this may also serve as a signal to upgrade or expand the transmission lines. However, as Ms. Javier mentioned, this may result to frequent congestion resulting to higher prices since line utilization is not maximized. Mr. Cacho recommended that this matter be further studied.</p> <p>Mr. Olmedo (IEMOP) added that there could be more frequent re-dispatch, especially in heavily congested lines, because the SO is tasked to maintain the 90% loading level requirement. Maximizing the loading levels would lessen/minimize occurrences of dispatching constrain-on (MOT) and must-run generating units. It will also more accurately reflect which portions of the grid are deficient in transmission capacities and generation. Mr. Olmedo concurred that the 90% loading level requirement may need further evaluation to assess how it affects lines and equipment, as well as its financial implication.</p> <p>Mr. Jed Tetangco (MERALCO) stated that for MERALCO, the threshold is 80%. During force majeure events, they maximize the loading levels beyond 90%, sometimes even up to 110%. If loading levels frequently hit 90%, there might be planning or system design problems. He added that transmission systems are looped or meshed so they are designed to have N-1, such that if one portion went on outage, the system should not be affected.</p>



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	<p>The RCC agreed to defer approval of proposed amendments to Section 5.1(e) of the SSRG Manual.</p> <p><u>Agreement:</u></p> <p>The RCC provisionally approved the proposal, subject to discussion regarding the following pending items in the next RCC meeting:</p> <ul style="list-style-type: none"> a) Interpretation of PGC2016 GO 6.2.2.1 (e) [operational thermal limit capacity] – to be requested from the Technical Committee, along with inclusion in their Q3 2022 study of the market network model b) IEMOP’s study on the impact to market prices of the provision regarding critical loading c) NGCP’s input/updates on request for derogation from the ERC regarding issuance of grid operation notices <p>Note: Item <i>c</i> will be elevated to ERC together with results of items <i>a</i> & <i>b</i>.</p>
<p>5.3. Proposed Amendments to the WESM Manuals to Include Pricing Error Notice Event as Pricing Condition Category for Claiming Additional Compensation (ORCP-WM-22-01) - Deliberation of Comments and Proponent’s Response</p>	<p><u>Presenter:</u> Millennium Energy/Panasia Energy, Inc. (Proponent)</p> <p><u>Action Requested:</u> For deliberation and approval</p> <p><u>Proceedings:</u></p> <p>Discussion of the proposal was deferred to the next RCC meeting. It will be the first agenda item.</p>
<p>VI. Other Matters</p>	
<p>6.1. DOE Updates</p>	<p><u>Presenter:</u> DOE Representatives</p> <p><u>Action Requested:</u> For information</p> <p><u>Proceedings:</u></p> <p>There is no upcoming public consultation on rules change proposal as of date.</p> <p>The following DOE circulars will be released for publication:</p>

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	<p>a) 2022-03-0009: Cessation and Deregistration b) 2022-03-0010: Registration Manual to clarify BCQ accounted for in Settlements c) 2022-03-0011: WESM Rules and IDC Manual on Exceptions to Confidentiality Undertaking by Oversight Bodies d) 2022-03-0012: WESM Rules, Retail Rules, and Market Manuals on Audit</p>
<p>6.2. Recently Promulgated Amendments to Market Documents</p> <p>a) DOE DC 2022-03-0003: Provisions for Prudential Requirement b) DOE DC 2021-07-0021: Provisions for Metering Services Provider Performance, Metering Standards and Site-Specific Loss Adjustments</p>	<p><u>Presenter:</u> Divine Gayle C. Cruz (Secretariat)</p> <p><u>Action Requested:</u> For information</p> <p><u>Proceedings:</u> The WESM Rules and WESM-BSM reflecting the revisions regarding prudential requirement were already posted in the PEMC website on 05 April 2022 (as clarified with DOE representative) On item (b), RRD will release a revised WESM-Metering Manual reflecting DOE's clarification on the issued circular.</p>
<p>6.3. Updates on RCC Proposals</p> <ul style="list-style-type: none"> Proposed Amendments to the WESM Rules and Manuals regarding Clarifications on Indirect WESM Membership 	<p><u>Presenter:</u> Divine Gayle C. Cruz (Secretariat)</p> <p><u>Action Requested:</u> For information</p> <p><u>Material:</u> Annex C – List of Unregistered Loads and Status of Registration</p> <p><u>Proceedings:</u> Ms. Cruz informed that the subject proposal was disapproved by the DOE, per their letter to the PEM Board dated 30 March 2022. Per IEMOP's update, the 10 loads that are subject of the proposal are not yet registered as of date. Updates on the meeting between IEMOP and PEMC-ECO on whether the concerned entities are in breach of the WESM Rules and WESM Manuals will be provided by PEMC in the next meeting. Per DOE's update, the DOE and IEMOP will discuss on the way forward regarding the unregistered loads applying the DOE DC on Direct Connection.</p>



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V. Schedule of Next Meetings	<p><u>Presenter:</u> Ms. Dianne L. De Guzman (Secretariat)</p> <p><u>Action Requested:</u> For information</p> <p>The RCC noted the following schedules:</p> <ul style="list-style-type: none"> • RCC Meetings <ul style="list-style-type: none"> ○ 20 May 2022 ○ 17 Jun 2022 ○ 15 Jul 2022 • BRC Meeting <ul style="list-style-type: none"> ○ 20 Apr 2022 • PEM Board Meeting <ul style="list-style-type: none"> ○ 27 Apr 2022 • RCC presenter for the Board Meeting will be designated offline.
IX. Adjournment	The meeting was adjourned at 4:32 PM.



MEETING MINUTES

Subject/Purpose : 195th Rules Change Committee (Regular) Meeting
Date & Time : 22 April 2022, 09:00 AM
Venue : Online via Microsoft Teams
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Prepared by:

DIVINE GAYLE C. CRUZ
Senior 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)

CHEERY 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)



MEETING MINUTES

Subject/Purpose : 195th Rules Change Committee (Regular) Meeting
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RYAN S. MORALES
Member, Distribution Sector
Manila Electric Company (MERALCO)

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

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

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

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

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

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

ANNEX A1 – Partial Matrix of Proposed Amendments to the Retail Manual on Registration Criteria and Procedures

Retail Manual on 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 (22 Apr 2022)
					<p>IEMOP: Propose to include additional provisions to define procedures for cessation of membership, de-registration and suspension of CRB-only registered participants:</p> <p>Original provision:</p> <p>III. SUSPENSION, DISCONNECTION AND DE-REGISTRATION</p> <p>The suspension, de-registration and cessation of the membership of the <i>Suppliers</i> and <i>Contestable Customers</i> in the <i>WESM</i> shall be governed by the <i>WESM Rules, Retail Rules and relevant Market Manuals</i>.</p>	<p>IEMOP:</p> <p>Suggested revision:</p> <p>III. SUSPENSION, DISCONNECTION AND DE-REGISTRATION <u>AND CESSATION</u></p> <p><u>1. FOR PARTICIPANTS REGISTERED IN THE WESM</u></p> <p>The suspension, de-registration and cessation of the membership of the <i>Suppliers, <u>Retail Metering Services Providers</u></i> and <i>Contestable Customers</i> in</p>		

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						<p>the <i>WESM</i> shall be governed by the <i>WESM Rules, Retail Rules and relevant Market Manuals</i>, <u>provided that the Contestable Customer and/or its relevant Supplier is not required to provide notice of cessation of WESM membership of a Contestable Customer to the System Operator.</u></p> <p><u>Upon suspension, de-registration, or cessation of membership from the WESM, the Supplier, Retail Metering Services Provider or Contestable Customer shall also be deemed suspended, de-registered or ceased with the Central Registration Body.</u></p>		

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						<p><u>2. FOR PARTICIPANTS REGISTERED WITH THE CENTRAL REGISTRATION BODY ONLY</u></p> <p><u>The cessation of registration of <i>Contestable Customers</i> that are not registered in the WESM but registered with the Central Registration Body shall be governed by the following:</u></p> <p><u>2.1 The incumbent Supplier or Supplier of Last Resort shall initiate the cessation of registration of a Contestable Customer when it receives notice from the relevant Network Service Provider that the Contestable Customer has met</u></p>		<p><u>2.1 The incumbent Supplier or Supplier of Last Resort shall initiate the cessation of registration of a Contestable Customer when it receives notice from the relevant Network Service Provider that the Contestable Customer has</u></p>

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						<p><u>any of the following conditions:</u></p> <p>i. <u>Disconnection from its network;</u> or</p> <p>ii. <u>Reversion to being a Captive End-User.</u></p> <p><u>2.2 The incumbent Supplier or Supplier of Last Resort shall provide a notice to the Central Registration Body in writing which shall, among other things, specify the date on which the Contestable Customer shall cease to be registered, which date shall not be less than thirty (30) business days after the date on which the Supplier sends the notice.</u></p>		<p><u>met any of the following conditions:</u></p> <p>i. <u>Disconnection Termination from its network; or</u></p> <p>ii. <u>Reversion to being a Captive End-User.</u></p>

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						<p><u>2.3. If the reason for cessation of registration is the disconnection of the <i>Contestable Customer</i>, the notice to be submitted by the incumbent <i>Supplier</i> or <i>Supplier of Last Resort</i> to the <i>Central Registration Body</i> shall be accompanied by the proof of disconnection of <i>Contestable Customer</i>, as well as a notice of cessation to the <i>Network Service Provider</i> and copy of its proof of receipt of the notice.</u></p> <p><u>2.4. If the reason for cessation of registration is the reversion of the <i>Contestable Customer</i> to being a <i>Captive End-User</i>, the notice to be</u></p>		<p><u>2.3. If the reason for cessation of registration is the disconnection termination of the <i>Contestable Customer</i>, the notice to be submitted by the incumbent <i>Supplier</i> or <i>Supplier of Last Resort</i> to the <i>Central Registration Body</i> shall be accompanied by the proof of disconnection termination of <i>Contestable Customer</i>, as well as a notice of cessation to the <i>Network Service Provider</i> and copy of its proof of receipt of the notice.</u></p> <p><u>2.4. If the reason for cessation of registration is the reversion of the <i>Contestable Customer</i> to being a <i>Captive End-User</i>, the notice to be submitted by the incumbent <i>Supplier</i></u></p>

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						<p><u>submitted by the incumbent Supplier or Supplier of Last Resort to the Central Registration Body shall be accompanied by the confirmation by the Network Service Provider that the Contestable Customer has met the conditions for reversion and confirmation from the incumbent Supplier or Supplier of Last Resort that the Contestable Customer has fulfilled all contractual obligations.</u></p> <p><u>2.5 The cessation shall be effective on the date stated in the notice submitted by the incumbent Supplier or Supplier of Last Resort or on such other date as may be notified by</u></p>		<p><u>or Supplier of Last Resort to the Central Registration Body shall be accompanied by the confirmation approval by the Network Service Provider ERC that the Contestable Customer has met the conditions for reversion and confirmation from the incumbent Supplier or Supplier of Last Resort that the Contestable Customer has fulfilled all contractual obligations.</u></p> <p><u>2.5 The cessation shall be effective on the date stated in the notice submitted by the incumbent Supplier or Supplier of Last Resort or on such other date as may be notified by the Central Registration Body</u></p>

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						<p><u>the Central Registration Body which shall not be less than thirty (30) business days from the date the notice was sent by the incumbent Supplier or Supplier of Last Resort.</u></p> <p><u>2.6 Upon submission of the notice of cessation by the incumbent Supplier or Supplier of Last Resort and on the effective date, the Contestable Customer shall cease to be registered as a Contestable Customer with the Central Registration Body and shall cease all activities relevant to a Contestable Customer.</u></p> <p><u>2.7 Notwithstanding cessation of registration, all outstanding obligations</u></p>		<p><u>which shall not be less than thirty (30) business days from the date the notice was sent by the incumbent Supplier or Supplier of Last Resort, subject to completeness of requirements.</u></p>

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					<p>*****</p> <p>The purpose of the following proposed amendments is to harmonize the NSPs' responsibility for</p>	<p><u>and liabilities to the Central Registration Body or to any other person, including financial liabilities and obligations which arose under the Retail Rules, of the Contestable Customer shall remain valid and subsisting until fully settled.</u></p> <p><u>2.8 A Contestable Customer may be registered again with the Central Registration Body upon approval of switch request submitted by a new Supplier.</u></p> <p>*****</p>		<p><u>2.8 A Contestable Customer may be registered again with the Central Registration Body upon approval of switch request submitted by a new Supplier, subject to eligibility requirements.</u></p>

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					<p>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. The timeline for submission of customer information is also proposed to be harmonized to every 15th day of the month for both RCOA and GEOP which is the timeline set out in the ERC GEOP Rules Section 48. We also propose to delete the requirement to secure confirmation with ERC on the certification of contestability given that DU confirmation in the monthly bill shall already suffice per</p>			

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Retail Manual on Registration Criteria and Procedures								
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					<p>ERC GEOP Rules Section 4.2 and ERC Reso No. 12, Series of 2020 Section 3.</p> <p>Note that the Retail Manual on Registration Criteria and Procedures is applicable to RCOA transactions only as defined in the Scope of the manual. Registration criteria and procedures for GEOP are governed by the Retail Manual on GEOP procedures.</p> <p>Original provision:</p> <p>3.2.1. <i>Distribution Utilities</i> shall notify the <i>Central Registration Body</i> within fifteen (15) <i>working days</i> from its validation that a customer has met the required demand threshold of contestability. The <i>Distribution Utilities</i> shall submit to the <i>Central Registration Body</i> the</p>	<p>Suggested revision:</p> <p>3.2.1. <i>Distribution Utilities</i> shall notify the <i>Central Registration Body</i> within fifteen (15) <i>working days</i> from its validation that a customer has met the required demand threshold of contestability. The <i>Distribution Utilities</i> <i>Network Service Providers</i> shall submit to</p>		

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Retail Manual on 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 (22 Apr 2022)
					<p>following customer information:</p> <ul style="list-style-type: none"> a) Customer name; b) Billing and service addresses; c) Customer's account number; d) Customer contact information (telephone numbers and e-mail addresses); e) Meter number; f) Meter specifications (interval metering, channels); g) SEIN of the grid metering point of the Distribution Utility where the supply of the end user passes through. <p>The <i>Distribution Utilities</i> shall use the form published by the <i>Central Registration Body</i> in the market information website in providing the customer information of the end users identified in this Section.</p>	<p>the <i>Central Registration Body</i> the following customer information <u>of newly qualified customers that have met the threshold of contestability every fifteenth (15th) day of the month</u>:</p> <ul style="list-style-type: none"> a) Customer name; b) Billing and service addresses; c) Customer's 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 metering point of the Distribution Utility where the supply of the end user passes through; <u>and h) Confirmation that the end-user has signified interest to participate</u> 		

ANNEX A1 – Partial Matrix of Proposed Amendments to the Retail Manual on Registration Criteria and Procedures

Retail Manual on 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 (22 Apr 2022)
					<p>3.2.2. The <i>Central Registration Body</i>, within five (5) <i>working days</i> from receipt of such notice, shall secure confirmation from the <i>ERC</i> if such customer has been certified as contestable and, if so certified, shall maintain record of the customer in the database registry for <i>Contestable Customers</i>.</p>	<p><u>under retail competition.</u></p> <p>3.2.2 The <i>Distribution Utilities</i> shall use the form published by the <i>Central Registration Body</i> in the market information website in providing the customer information of the end users identified in this Section.</p> <p>3.2.2. The <i>Central Registration Body</i>, within five (5) <i>working days</i> from receipt of such notice, shall secure confirmation from the <i>ERC</i> if such customer has been certified as contestable and, if so certified, shall maintain record of the customer in the database registry for <i>Contestable Customers</i>.</p>		

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
SWITCHING TO A RENEWABLE ENERGY SUPPLIER	(new)	(new)	<p>3.3 SWITCHING TO A RENEWABLE ENERGY SUPPLIER</p> <p><u>3.3.1 A Renewable Energy Supplier may submit a switch request to the Central Registration Body if all of the following conditions are met:</u></p> <p><u>a) if the end-user is switching from a Distribution Utility, the end-user has settled its financial obligations with its Distribution Utility;</u></p> <p><u>b) the end-user has entered into a GEOP Supply Contract with a Renewable Energy Supplier;</u></p> <p><u>c) the end-user has entered into a Connection</u></p>	To specify switching procedures pursuant to Section 16 of ERC Resolution No. 08, Series of 2021.	<p>MERALCO: We note that there are other new requirements to be submitted by the Supplier, coming from the RMSP, such as the Certification of Metering Services Provider, Certification by the Network Services Provider, as well as corresponding proof of authority of</p>	<p>APC: In letter c): The end-user has entered into a Connection Agreement and/or Metering Services Agreement with its <i>Network Service Provider</i>; Then, remove item d).</p> <p>Rationale: not all NSP-End-user execute separate CA and MSA</p> <p>MERALCO: For CRB's alignment of procedures and complete enumeration of required documents from its GEOP Advisories to the Retail Manual. We kindly suggest to include all forms as Annex to the proposed manual.</p>	<p>Response to APC:</p> <p>Please see our proposed revision removing the requirement to submit Connection Agreement.</p> <p>Response to MERALCO:</p> <p>Agree on proposed revision to 3.3.1(e)</p> <p>We are open to incorporating Annexes subject to thorough consultation with concerned stakeholders on the timelines and procedures.</p>	<p>Adopt:</p> <ul style="list-style-type: none"> Proposed original urgent amendment MERALCO's suggestion for Sec. 3.3.1 (e), as amended IEMOP's suggestion for Sec. 3.3.1 (a) IEMOP's clerical edits for Sec. 3.3.1 (d) and (e)

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

			<p><u>Agreement with its Network Service Provider;</u></p> <p>d) <u>the end-user has entered into a Metering Services Agreement with a registered Retail Metering Services Provider; and</u></p> <p>e) <u>if applicable, the Renewable Energy Supplier has entered into a Distribution Wheeling Services Agreement with the Distribution Utility covering the end-user.</u></p>		<p>RMSP/DU/NSP representative.</p> <p>We suggest that the proposed Retail Manual for GEOP completely enumerate these requirements and manner of submission to RES (e.g., provided by RMSP to RES directly or via CRSS)</p> <p>The provision should also include a dual billing scenario where the GEOP End-User executes the DWSA with its DU.</p>	<p>xxx</p> <p>e) if applicable, the Renewable Energy Supplier has entered into a Distribution Wheeling Services Agreement with the Distribution Utility covering the end-user, or in case the end-user enrolls in dual billing, the end-user has entered into a Distribution Wheeling Services Agreement with the Distribution Utility.</p> <p>IEMOP:</p> <p>3.3 SWITCHING TO A RENEWABLE ENERGY SUPPLIER</p> <p>3.3.1 A Renewable Energy Supplier may submit a switch request to the Central Registration Body if all</p>	<p>Note, however, that any change in the forms shall require rules change if ever they will be included as an integral part of the Retail Rules and Manuals.</p> <p>Subject to further clarification from IEMOP process owner during RCC meeting</p>	<p><u>3.3 SWITCHING TO A RENEWABLE ENERGY SUPPLIER</u></p> <p><u>3.3.1 A Renewable Energy Supplier may submit a switch request to the Central Registration Body if all of the following conditions are met:</u></p> <p><u>a) if the end-user is switching from a Distribution Utility, the end-user has settled its financial obligations with its Distribution Utility, if the end-user is switching from a Distribution Utility, or its incumbent Supplier;</u></p> <p><u>b) the end-user has entered into a GEOP Supply Contract with a</u></p>
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ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					<p>IEMOP: Revised to consider settlement of financial obligations with incumbent Supplier.</p> <p>Propose to align with Retail Rules requirement wherein presence of Connection Agreement is not listed as a condition for switching.</p> <p>For transparency, this proposed revision is in conflict with Clause 16.2 of the ERC GEOP Rules.</p>	<p>of the following conditions are met:</p> <p>a) if the end-user is switching from a <i>Distribution Utility</i>, the end-user has settled its financial obligations with its <i>Distribution Utility</i>, <u>if the end-user is switching from a <i>Distribution Utility</i>, or its incumbent Supplier</u>,</p> <p>b) the end-user has entered into a <i>GEOP Supply Contract</i> with a <i>Renewable Energy Supplier</i>,</p> <p>c) the end-user has entered into a Connection Agreement with its</p>		<p><u><i>Renewable Energy Supplier</i></u>;</p> <p><u>c) the end-user has entered into a Connection Agreement with its <i>Network Service Provider</i></u>;</p> <p><u>d) the end-user has entered into a <i>valid Metering Services Agreement</i> with a registered <i>Retail Metering Services Provider</i>; and</u></p> <p><u>e) if applicable, the <i>Renewable Energy Supplier</i> has entered into a <i>valid Distribution Wheeling Services Agreement</i> with the <i>Distribution Utility</i> covering the end-user, or in case the end-user enrolls in</u></p>

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(NEW) Retail Manual on GEOP Procedures								
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						<p><i>Network</i> Service Provider;</p> <p>d) c) the end-user has entered into a valid Metering Services Agreement with a registered <i>Retail Metering Services Provider</i>; and</p> <p>e) d) if applicable, the <i>Renewable Energy Supplier</i> has entered into a valid Distribution-Wheeling Services Agreement with the <i>Distribution Utility</i> or <u>Network Service Provider</u> covering the end-user.</p>		<p><u>dual billing, the end-user has entered into a Distribution Wheeling Services Agreement with the Distribution Utility</u></p>

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(NEW) Retail Manual on GEOP Procedures								
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SWITCHING TO A RENEWABLE ENERGY SUPPLIER	(new)	(new)	<u>3.3.2 Once all the conditions set forth in Clause 3.3.1 are met, the new Renewable Energy Supplier shall submit the switch request to the Central Registration Body, copy furnished its Network Service Provider, not later than seven (7) working days prior to the proposed switch effective date.</u>					Adopt
SWITCHING TO A RENEWABLE ENERGY SUPPLIER	(new)	(new)	<u>3.3.3 The switch request submitted under Section 3.3.2 shall include an attestation duly signed by:</u> <u>a) if the end-user is switching from a Distribution Utility, the Distribution Utility that the end-user has settled its financial</u>			APC: Delete item e); <i>d). the end-user and the registered GEOP Metering Services Provider on the existence of a metering services agreement and/or connection agreement covering the end-user, and</i>	Response to APC: See our response to previous item	Note: Align these procedures with applicable provisions of the ERC GEOP Rules and the Retail Rules as deliberated by the RCC (i.e., submission of copies of documentary requirements, not just attestations). • Adopt original urgent

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

			<p><u>obligations with the Distribution Utility;</u></p> <p>b) <u>the Renewable Energy Supplier and the end-user on the existence of a GEOP Supply Contract between said parties, including the term and effectivity date of the GEOP Supply Contract;</u></p> <p>c) <u>the Renewable Energy Supplier and the relevant Distribution Utility on the existence of a wheeling service agreement covering the end-user;</u></p> <p>d) <u>the end-user and the registered GEOP Metering Services Provider on the existence of a metering services agreement covering the end-user; and</u></p> <p>e) <u>the end-user and its Network Service Provider on the</u></p>		<p>MERALCO: Harmonize with the ERC Resolution No. 8 series of 2021 Section 16.2 (Switching Procedure).</p> <p>Same comment as above, how about the scenario for dual billing wherein DWSA is between the end-user and the DU?</p>	<p>MERALCO: The Switch Request, to be submitted by the prospective RE Supplier through a Switch Request Form, shall be accompanied by the following documentary requirements: a.xxx b.xxx c.xxx d.xxx e.xxx f. xxx g. A verification executed by the RE Supplier stating that the above-enumerated documents are authentic and the contents thereof are true and correct xxx</p> <p>xxx) if applicable, the <i>Renewable Energy Supplier</i> has entered into a Distribution Wheeling Services Agreement with the <i>Distribution Utility</i> covering the end-user, or in case the end-user enrolls in dual</p>	<p>Response to MERALCO: Please see our proposed revision which may already address MERALCO's concern.</p> <p>Agree to consider cases of dual billing on DWSA submission</p>	<p>amendments, as revised.</p> <ul style="list-style-type: none"> • Add and enumerate documentary requirements based on the applicable GEOP Rules provision (already considered in Sec. 3.3.4). • Adopt MERALCO's suggestion regarding dual billing (already considered in Sec. 3.3.1) <p>3.3.3 The switch request submitted under Section 3.3.2 shall be electronically filled out and shall include an attestation duly signed by a confirmation by the authorized</p>
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ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

			<p><u>existence of a connection agreement covering the end-user.</u></p>		<p>IEMOP: Propose to align with Retail Rules requirement wherein presence of Connection Agreement is not listed as a condition for switching</p> <p>IEMOP proposes to transition to electronic processing and certification of switch requests to streamline the switching process for both RCOA and GEOP.</p> <p>For transparency, this proposed revision is in conflict with Clause 16.2 of the ERC GEOP Rules.</p> <p>If approved, implementation of this</p>	<p>billing, the end-user has entered into a Distribution Wheeling Services Agreement with the Distribution Utility</p> <p>IEMOP: 3.3.3 The switch request submitted under Section 3.3.2 shall <u>be electronically filled out and shall include an attestation duly signed by a confirmation by the authorized representatives of the following:</u></p> <p>a) if the end-user is switching from a Distribution Utility, the Distribution Utility that the end-user has settled its financial obligations with the Distribution Utility <u>or its incumbent Supplier,</u></p> <p>b) the <i>Renewable Energy Supplier</i> and the end-user on the existence of</p>		<p><u>representatives of the following:</u></p> <p>a) if the end-user is switching from a Distribution Utility, the Distribution Utility that the end-user has settled its financial obligations with the Distribution Utility <u>or its incumbent Supplier,</u></p> <p>b) the <i>Renewable Energy Supplier</i> and the end-user on the existence of a GEOP Supply Contract between said parties, including the term and effectivity date of the GEOP Supply Contract;</p> <p>c) the <i>Renewable Energy Supplier</i> and the relevant <u>Distribution Utility or Network Service Provider</u> on the existence of a <u>valid</u> wheeling service</p>
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					<p>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).</p>	<p>a) GEOP Supply Contract between said parties, including the term and effectivity date of the GEOP Supply Contract;</p> <p>c) the <i>Renewable Energy Supplier</i> and the relevant <i>Distribution Utility</i> <u>or Network Service Provider</u> on the existence of a <u>valid</u> wheeling service agreement covering the <i>end-user</i>;</p> <p>d) the <i>end-user</i> and the registered <i>GEOP Retail Metering Services Provider</i> on the existence of a <u>valid</u> metering services agreement</p>		<p>agreement covering the <i>end-user</i>;</p> <p>d) the <i>end-user</i> and the registered <i>GEOP Retail Metering Services Provider</i> on the existence of a <u>valid</u> metering services agreement covering the <i>end-user</i>; and</p> <p>e) the <i>end-user</i> and its <i>Network Service Provider</i> on the existence of a connection agreement covering the <i>end-user</i>.</p> <p><u>The Central Registration Body may require submission of appropriate documentation to ensure the authorized</u></p>

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					<p>NREB-TWG: These attestations should suffice as opposed to the submission of the actual supply contract, MSA, CA, etc.</p> <p>The use of attestations instead of actual contracts/documents also parallels the</p>	<p>covering the <i>end-user</i>; and e) the <i>end-user</i> and its <i>Network Service Provider</i> on the existence of a connection agreement covering the <i>end-user</i>.</p> <p><u>The Central Registration Body may require submission of appropriate documentation to ensure the authorized representatives have authority to represent their respective organizations.</u></p>	<p>NREB-TWG: Please see our proposed revision to Clause 3.3.3 which aims to harmonize GEOP process to RCOA process.</p> <p>The 90-day prior notice is required under Section 15.1 of the ERC GEOP Rules. However, we</p>	<p><u>representatives have authority to represent their respective organizations.</u></p>

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					<p>requirements for RCOA switching</p> <p>Is the 90 day prior notice of intent and the 30 day prior notice to effectivity still part of the switch requirements? Such documents are not required under RCOA switching but are being required for GEOP switchers</p>		also propose to do away with this requirement to harmonize with RCOA procedures.	
SWITCHING TO A RENEWABLE ENERGY SUPPLIER	(new)	(new)	<u>3.3.4 In addition to the attestations in Section 3.3.3, the Renewable Energy Supplier shall submit the documentary requirements set in Section 16.2 under ERC Resolution No. 08, Series of 2021.</u>		<p>PEMC</p> <p>Consider enumerating the documentary requirements set in Section 16.2 for easy reference.</p>	<p>PEMC</p> <p><u>In addition to the attestations in Section 3.3.3, the Renewable Energy Supplier shall submit the following documentary requirements under Section 16.2 of ERC</u></p>	Please see our proposed revision which may also address PEMC and MERALCO's comments.	Adopt PEMC

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						<p><u>Resolution No. 08, Series of 2021:</u></p> <ul style="list-style-type: none"> a. <u>Switch Request Form;</u> b. <u>Copy of Renewable Energy Supply Contract;</u> c. <u>Copy of valid Wheeling Service Agreement;</u> d. <u>Copy of valid Metering Services Agreement;</u> e. <u>Connection Agreement between a <i>GEOP End-User</i> and its <i>Network Service Provider</i>;</u> f. <u>Prudential Requirements; and</u> g. <u>A verification executed by the <i>Renewable Energy Supplier</i> stating that the above-enumerated documents are</u> 		

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					<p>MERALCO: For clarification of the IEMOP's intention whether the submission of the attestations are supplementary to the copies of the relevant agreements required under the GEOP Rules.</p> <p>Propose to delete this portion as Attestation 3.3.3 should cover ERC Resolution No. 8 series of 2021 Section 16.2 (Switching Procedure).</p> <p>IEMOP: Propose to delete to harmonize with Retail</p>	<p><u>authentic, and the contents thereof are true and correct.</u></p> <p>MERALCO: Propose to DELETE this section.</p> <p>IEMOP: 3.3.4 In addition to the attestations in Section</p>		

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					<p>Rules wherein submission of documentary requirements are not required</p> <p>For transparency, this proposed revision is in conflict with Clause 16.2 of the ERC GEOP Rules.</p>	<p>3.3.3, the Renewable Energy Supplier shall submit the documentary requirements set in Section 16.2 under ERC Resolution No. 08, Series of 2021.</p>		

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SWITCHING TO A RENEWABLE ENERGY SUPPLIER	(new)	(new)	<u>3.3.5 Upon receipt of a switch request, the Central Registration Body shall immediately evaluate the completion of the requirements under Clause 3.3.3. The Central Registration Body shall notify the Renewable Energy Supplier and the GEOP End User, as applicable of status and further requirements such as prudential requirements, if any, within two (2) working days from its receipt of the switch request.</u>		<p>APC: In line with the CRB's 1st to 15th of the month deadline to submit the GEOP switch request/s, for advance submission of the switch requirements, CRB should at least notify the RE Supplier within two (2) working days, 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>MERALCO: Reword to consider 3.3.3 revisions and to harmonize with ERC</p>	<p>MERALCO: <u>Upon receipt of a switch request, the Central Registration Body shall</u></p>	<p>Response to APC: 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). Subject to further clarification from IEMOP process owner during RCC meeting</p> <p>MERALCO: Agree with proposed revision.</p>	Adopt MERALCO

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					Resolution No. 8 s2021	<u>immediately evaluate the completeness of the requirements under Clause 3.3.3. The Central Registration Body shall notify the Renewable Energy Supplier and the GEOP End User, as applicable of status and further requirements such as prudential requirements of any deficiencies, if any, within two (2) working days from its receipt of the switch request.</u>		

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SWITCHING TO A RENEWABLE ENERGY SUPPLIER	(new)	(new)	<u>3.3.6 All deficiencies, except those relating to metering requirements, in the switch request submission shall be addressed by the Renewable Energy Supplier and the GEOP End-User within two (2) working days from the receipt of the Central Registration Body's notice.</u>		MERALCO: Reword to harmonize with ERC Resolution No. 8 s2021	MERALCO: <u>All deficiencies, except those relating to metering requirements, in the switch request submission shall be addressed should be completed by the Renewable Energy Supplier and the GEOP End-User within two (2) working days from the receipt of the Central Registration Body's notice. Thereafter, the CRB shall complete its evaluation no more than two (2) business days from receipt of the complete submissions. The aforementioned procedure shall likewise apply to regular switching from one RE Supplier to another.</u>	Response to MERALCO: Agree with proposed revision.	Adopt MERALCO, as revised: MERALCO: <u>All deficiencies, except those relating to metering requirements, in the switch request submission shall be addressed shall be completed by the Renewable Energy Supplier</u> xxx

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SWITCHING TO A RENEWABLE ENERGY SUPPLIER	(new)	(new)	<u>3.3.7 If the deficiency pertains to the metering requirements, the relevant Retail Metering Services Provider shall complete the requirements within five (5) working days from its receipt of notice.</u>		<p>APC: Please harmonize with RCOA switch's metering rectification timeline which is up to 15 working days (instead of 5 working days).</p> <p>MERALCO: Reword to harmonize with ERC Resolution No. 8 s2021</p> <p>IEMOP: We retain our same proposal to harmonize timeline for rectifying metering deficiencies</p>	<p>MERALCO: To ADD this in the paragraph: <u>For cases which requires scheduling of service interruption on the part of the End-user, the completion will be based on the agreed date of execution with the End-user.</u></p> <p>IEMOP: If the deficiency pertains to the metering requirements, the relevant <i>Retail Metering</i></p>	<p>Response to APC: Please see our proposed revision.</p> <p>MERALCO: Agree with proposed revision.</p>	<ul style="list-style-type: none"> Align timeline with ERC GEOP Rules (i.e., 15 working days) Adopt MERALCO's suggestion on additional paragraph Adopt IEMOP's proposed Sec. 3.3.8 <p><u>3.3.7 If the deficiency pertains to the metering requirements, the relevant Retail Metering Services Provider shall complete the requirements within five (5) working days from its receipt of notice.</u></p> <p><u>For cases which requires scheduling of</u></p>

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					<p>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)</p> <p>Inserted provision for correcting deficiencies on customer information, previously placed in Section 2.3.</p> <p>For transparency, this proposed revision is in conflict with Clause 17.2(d) of the ERC GEOP Rules.</p>	<p><i>Services Provider</i> shall complete the requirements within five (5) fifteen (15) working days from its receipt of notice.</p> <p><u>3.3.8 If the Central Registration Body determines that the GEOP End-User has incomplete customer information as required under Section 2.5.2 of this Manual, the Central Registration Body shall notify the relevant Network Service Provider to provide the necessary information within two (2) working days from the receipt of the notification.</u></p>		<p><u>service interruption on the part of the End-user, the completion will be based on the agreed date of execution with the End-user.</u></p> <p><u>3.3.8 If the Central Registration Body determines that the GEOP End-User has incomplete customer information as required under Section 2.5.2 of this Manual, the Central Registration Body shall notify the relevant Network Service Provider to provide the necessary information within two (2) working days from the</u></p>

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					<p>NREB-TWG: Should the RMSP fail to complete within the 5 working days, what is the recourse or the penalty for the RMSP?</p>		<p>NREB-TWG: Please see section 59 of ERC GEOP Rules and Article VIII of ERC Resolution No. 9, series of 2018. It provides general statement that non-compliance with the switch timelines may result to sanctions.</p> <p>PEMC's Response to NREB: It appears that the succeeding Section (3.3.8) only provides for the consequence for not completing any deficiency in the metering requirements, i.e., the switch request processing shall not proceed. To provide sanction therefor, the proponent may like to</p>	<p><u>receipt of the notification.</u></p>

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							<p>consider providing here that it would be subject to penalty.</p> <p>The GEOP User may also enforce the contractual obligations of the MSP, is such is covered by the MSA.</p> <p>The ERC may also be consulted on the applicability of Section 59 of the GEOP Rules on Sanctions to this kind of situation.</p>	

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SWITCHING TO A RENEWABLE ENERGY SUPPLIER	(new)	(new)	<u>3.3.8 If the deficiencies in the application or requirements are not rectified within the prescribed timeframes, the Central Registration Body shall notify the Renewable Energy Supplier, copy furnish the GEOP End-User and Network Service Provider, within three (3) working days that the processing of the switch request shall not be proceed. Such notification is without prejudice to refiling of a new request, provided all conditions will be met by the Renewable Energy Supplier and/or party required to comply.</u>			<p>APC: If the deficiencies in the application or requirements are not rectified within the prescribed timeframes, the <i>Central Registration Body</i> shall notify the <i>Renewable Energy Supplier</i>, copy furnish the <i>GEOP End-User</i> and <i>Network Service Provider</i>, within three (3) <i>working days</i> that the processing of the switch request shall not be proceed.</p> <p>MERALCO: If the deficiencies in the application or requirements are not rectified within the prescribed timeframes, the <i>Central Registration Body</i> shall notify the <i>Renewable Energy Supplier</i>, copy furnish the <i>GEOP End-User</i> and <i>Network Service</i></p>	Agree with clerical correction.	<p>Adopt original urgent amendments and clerical correction from MERALCO and APC.</p> <p><u>3.3.8 If the deficiencies in the application or requirements are not rectified within the prescribed timeframes, the Central Registration Body shall notify the Renewable Energy Supplier, copy furnish the GEOP End-User and Network Service Provider, within three (3) working days that the processing of the switch request shall not be proceed.</u></p>

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					<p>IEMOP: 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)</p>	<p><u>Provider, within three (3) working days that the processing of the switch request shall not be proceed. Such notification is without prejudice to refileing of a new request, provided all conditions will be met by the Renewable Energy Supplier and/or party required to comply.</u></p> <p>IEMOP: 3.3.8 3.3.9 If the deficiencies in the application or requirements are not rectified within the prescribed timeframes, the <i>Central Registration Body</i> shall notify the <i>Renewable Energy Supplier</i>, copy furnish the GEOP End-User and Network Service Provider, <u>the incumbent Supplier and the Distribution Utility or Network Service Provider</u></p>		

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					For transparency, this proposed revision is in conflict with Clauses 17.2(a) and 17.2(e) of the ERC GEOP Rules.	within three (3) <i>working days</i> that the processing of the switch request shall not be proceed. Such notification is without prejudice to re-filing of a new request, provided all conditions will be met by the <i>Renewable Energy Supplier</i> and/or party required to comply.		
SWITCHING TO A RENEWABLE ENERGY SUPPLIER	(new)	(new)	<u>3.3.9 Within two (2) working days from its confirmation that the prudential requirements, metering requirements, and customer information requirements are satisfied, the Central Registration Body shall approve the switch request and shall notify the following of the confirmation of the switch request, including the effective date of the switch:</u>		<p>MERALCO: Minor suggested revision and to harmonize with ERC Resolution No. 8 s2021 Section 17.1.b</p> <p>IEMOP: Re-numbering</p>	<p>MERALCO: b) the incumbent Supplier or Distribution Utility, as applicable</p> <p>Proposing to ADD: e) GEOP End-user</p> <p>IEMOP: 3-3-9 3.3.10 Within two (2) <i>working days</i> from its confirmation that the <i>prudential requirements</i>, metering</p>	<p>MERALCO: Agree with proposed revision to 3.3.9b)</p> <p>We propose that notification of approval to the GEOP End-User be done by its RE Supplier. This is to harmonize with RCOA Clause 3.2.2.3 procedure for approvals involving a Contestable Customer that is not intending to register in the WESM.</p>	Adopt MERALCO's proposed revision to Sec. 3.3.9(b)

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			<p>a) <u>new Renewable Energy Supplier,</u> b) <u>the incumbent Supplier or Distribution Utility</u> c) <u>the Retail Metering Services Provider, and</u> d) <u>the relevant Distribution Utility or Network Service Provider.</u></p>			<p>requirements, and customer information requirements are satisfied, the <i>Central Registration Body</i> shall approve the switch request and shall notify the following of the confirmation of the switch request, including the effective date of the switch:</p> <p>a) new Renewable Energy Supplier, b) the incumbent Supplier or Distribution Utility c) the Retail Metering Services Provider, and d) the relevant Distribution Utility or Network Service Provider.</p>		

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SWITCHING TO A RENEWABLE ENERGY SUPPLIER	(new)	(new)	<u>3.3.10 If the approved switch request is for the supply of a Renewable Energy Supplier to an end-user from a Network Service Provider, the Central Registration Body shall register the end-user as a GEOP End-User.</u>		IEMOP: Re-numbering	IEMOP: 3.3.10 3.3.11 If the approved switch request is for the supply of a Renewable Energy Supplier to an end-user from a Network Service Provider, the Central Registration Body shall register the end-user as a GEOP End-User.		Adopt
SWITCHING TO A SUPPLIER THAT IS NOT A RENEWABLE ENERGY SUPPLIER	(new)	(new)	<u>3.4 SWITCHING TO A SUPPLIER THAT IS NOT A RENEWABLE ENERGY SUPPLIER</u>	To clarify that switching to a Supplier that is not a Renewable Energy Supplier is governed by the Retail Manual on Market Transaction Procedures.	MERALCO: It is observed that mere qualification as Contestable Customer (i.e., threshold for contestability) is not enough. There are other requirements that need to be complied with by the Contestable Customer. Suggest to mention this, to avoid confusion.	MERALCO: <u>3. SWITCHING TO A SUPPLIER THAT IS NOT A RENEWABLE ENERGY SUPPLIER</u> <u>3.4.1 A Supplier that is not a Renewable Energy Supplier shall submit a switch request for its supply to a GEOP End-User in accordance with the procedures under the Retail Manual on Market Transaction Procedures, provided that the end-user is</u>	MERALCO: Agree with proposed revision.	Adopt MERALCO and IEMOP revisions <u>3.4.1 If a GEOP End-user wishes to switch to A a Supplier that is not a Renewable Energy Supplier, the new Supplier shall submit a switch request for its supply to a GEOP End-User in accordance with the procedures under the Retail</u>

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			<p><u>3.4.1 A Supplier that is not a Renewable Energy Supplier shall submit a switch request for its supply to a GEOP End-User in accordance with the procedures under the Retail Manual on Market Transaction Procedures, provided that the end-user is also qualified under applicable laws and issuances to be a Contestable Customer.</u></p> <p><u>3.4.2 The Central Registration Body shall de-register the GEOP End-User at the switch effective date to the Supplier and register it as a Contestable Customer.</u></p>		<p>IEMOP: Propose that End-users switching from a Renewable Energy Supplier to a Retail Electricity Supplier shall not be de-registered instead its registration category will just be updated.</p>	<p><u>also qualified to be a Contestable Customer and complies with the necessary requirements under applicable laws and issuances.</u></p> <p>IEMOP: 3.4 SWITCHING TO A SUPPLIER THAT IS NOT A RENEWABLE ENERGY SUPPLIER</p> <p>3.4.1 <u>If a GEOP End-user wishes to switch to</u> A a Supplier that is not a Renewable Energy Supplier, <u>the new Supplier</u> shall submit a switch request for its supply to a GEOP End-User in accordance with the procedures under the Retail Manual on Market Transaction Procedures, provided that the end-user is also qualified under</p>		<p><u>Manual on Market Transaction Procedures, provided that the end-user is also qualified to be a Contestable Customer and complies with the necessary requirements under applicable laws and issuances.</u></p> <p><u>3.4.2 The Central Registration Body shall de-register the update the registration category of the GEOP End- User at the switch effective date to the Supplier and register it as to a Contestable Customer.</u></p>
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						<p>applicable laws and issuances to be a <i>Contestable Customer</i>.</p> <p>3.4.2 The <i>Central Registration Body</i> shall de-register the update the registration category of the <i>GEOP End-User</i> at the switch effective date to the <i>Supplier</i> and register it as to a <i>Contestable Customer</i>.</p>		
SWITCHING TO A DISTRIBUTION UTILITY	(new)	(new)	<p><u>3.5 SWITCHING TO A DISTRIBUTION UTILITY</u></p> <p><u>3.5.1 <i>GEOP End-User</i> may revert to being a <i>Captive End-User</i> subject to fulfillment of any of the following conditions:</u></p>	To align and thresh out details of Section 24 of the ERC Resolution No. 8 Series of 2021	<p>MERALCO: As clarified by the ERC, the conditions or circumstances under Section 24.1 when the <i>GEOP End-User</i> may revert to the captive market should be concurrent, thus all conditions therein should be present.</p>	<p>MERALCO: <u>3.5.1. A <i>GEOP End-User</i> may revert to being a <i>Captive End-User</i>, subject to the following conditions or circumstances:</u></p> <p><u>a. It has fulfilled its contractual obligations to the RE Supplier/s;</u></p> <p><u>b. It has executed an agreement for the</u></p>	<p>Response to MERALCO:</p> <p>Suggest to clarify with ERC whether conditions c), d) and e) of Section 24 of the ERC <i>GEOP Rules</i> really need to be concurrent as it would appear an <i>End-User</i> whose <i>SOLR contract</i> already exceeded the maximum period will not be permitted to</p>	<p>Adopt MERALCO, as revised per suggestion by IEMOP (specifically for item c):</p> <p><u>3.5.1. A <i>GEOP End-User</i> may revert to being a <i>Captive End-User</i>, subject to the following conditions or circumstances:</u></p>

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			<p>a) <u>Its average monthly peak demand has decreased, rendering it ineligible to participate in the Green Energy Option Program;</u></p> <p>b) <u>Any of the last resort supply events under Clause 3.9.1 has occurred;</u></p> <p>c) <u>Its contract with a Supplier of Last Resort has exceeded the maximum period.</u></p>			<p><u>supply of electricity, through the DU, in accordance with the DSOAR;</u></p> <p><u>c. Its average monthly peak demand has decreased below 75% of 100 kW for the immediately preceding 6 consecutive months and the same is not attributable to seasonal demand as confirmed by CRB and the MSP, rendering it ineligible to participate in the Green Energy Option Program;</u></p> <p><u>d. Its contract with a Supplier of Last Resort has exceeded the maximum period.</u></p>	<p>revert to the captive market if its average peak demand has not decreased below the GEOP threshold. At the same time, an End-User who has not encountered a last resort supply event shall not be permitted to revert to the captive market even if its average peak demand has already decreased below the GEOP threshold.</p> <p>Please see suggested revision to item c to avoid need for amendment in case of change in threshold.</p> <p><u>c. Its average monthly peak demand has decreased below the set threshold by the ERC for GEOP End-Users, rendering it ineligible to participate in the</u></p>	<p><u>a. It has fulfilled its contractual obligations to the RE Supplier/s;</u></p> <p><u>b. It has executed an agreement for the supply of electricity, through the DU, in accordance with the DSOAR;</u></p> <p><u>c. Its average monthly peak demand has decreased below 75% of demand threshold set by ERC 100-kW for the immediately preceding 6 consecutive months and the same is not attributable to seasonal demand as confirmed by CRB and the MSP, rendering it ineligible to participate in the</u></p>
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							<u>Green Energy Option Program;</u>	<u>Green Energy Option Program;</u> <u>d. Its contract with a Supplier of Last Resort has exceeded the maximum period.</u>
SWITCHING TO A DISTRIBUTION UTILITY	(new)	(new)	<u>3.5.2 A GEOP End-User may only exercise its option to revert to being a Captive End-User once every twelve (12) months.</u>					Adopt

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
SWITCHING TO A DISTRIBUTION UTILITY	(new)	(new)	<p><u>3.5.3 A GEOP End-User shall notify the Central Registration Body if it wishes to revert to being a Captive End-user by submitting an attestation signed by the following:</u></p> <p>a) <u>The incumbent Supplier or Supplier of Last Resort, attesting that the said Retail Customer has fulfilled all of its contractual obligations;</u></p> <p>b) <u>The Distribution Utility attesting it agrees to supply the GEOP End-user;</u></p>		<p>APC: Please provide attestation template/s for this process.</p> <p>MERALCO: Kindly revise to harmonize with GEOP rules Section 4.2.b. in which the xxx RE Supplier shall send a written request to the DU, with a confirmation from CRB and MSP that the demand level has decreased by such amount xxx.</p> <p>Propose to remove Attestation as it is NOT found in any ERC GEOP rules. However, we suggest a Certification be issued instead subject to CRB release of template.</p>	<p>MERALCO: Revise to harmonize with GEOP rules Section 4.2.b.</p> <p>Propose to REMOVE Attestation as it is NOT found in any ERC GEOP rules.</p>	Please see our proposed revision	Adopt IEMOP

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					<p>May we know what are the conditions that could warrant disapproval of reversion to captive? What could be the grounds for the DU not to allow the reversion?</p> <p>If the DU does not agree to supply the GEOP end-user, what will be source of power of the GEOP end-user? Will it continued to be served by its incumbent RE Supplier or would it be served by the SOLR for the meantime?</p> <p>IEMOP: To align procedures for reversion to the Captive Market with</p>	<p>IEMOP: 3.5.3 A <i>GEOP End-User</i> shall notify the Central Registration</p>		

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					<p>the procedures for cessation of registration.</p> <p>Section 24 of ERC Resolution No. 8, Series of 2021 did not provide specific responsibilities for the CRB to verify conditions for reversion to the Captive Market.</p>	<p>Body <u>its incumbent Renewable Energy Supplier or Supplier of Last Resort and its Network Service Provider</u> if it wishes to revert to being a <u>Captive End-user</u>, by submitting an attestation signed by the following:</p> <p>a) The incumbent Supplier or Supplier of Last Resort, attesting that the said Retail Customer has fulfilled all of its contractual obligations;</p> <p>b) The Distribution Utility attesting it agrees to supply the GEOP End-user;</p>		

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
SWITCHING TO A DISTRIBUTION UTILITY	(new)	(new)	<u>3.5.4 Upon receipt of the attestation under Clause 3.5.3, the Central Registration Body shall immediately evaluate the existence of conditions under Sections 3.5.1 and 3.5.2.</u>		<p>MERALCO: Revised to harmonize with GEOP rules Section 4.2.b.</p> <p>Propose to REMOVE Attestation as it is NOT found in any ERC GEOP rules. However, we suggest a Certification be issued instead subject to CRB release of template</p> <p>IEMOP: To align procedures for reversion to the Captive Market with the procedures for cessation of registration.</p>	<p>IEMOP: 3.5.4 Upon receipt of the attestation under Clause 3.5.3, the Central Registration Body shall immediately evaluate the existence</p>	Please see our proposed revision.	Adopt IEMOP (to delete Sec. 3.5.4)

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					Section 24 of ERC Resolution No. 8, Series of 2021 did not provide specific responsibilities for the CRB to verify conditions for reversion to the Captive Market.	of conditions under Sections 3.5.1 and 3.5.2.		
SWITCHING TO A DISTRIBUTION UTILITY	(new)	(new)	<u>3.5.5 If the conditions under Sections 3.5.1 and 3.5.2 are not met, the Central Registration Body shall notify the GEOP End-user that it may not revert to the captive market within two (2) working days from receipt of the attestation under Section 3.5.4.</u>		MERALCO: Same comment as above on who shall supply the power requirement of the GEOP End-User? Consider to reword so as not to be construed that revert to captive market is within two (2) working days. In the GEOP DWSA Section 15, in case or reversion to Captive market, the discontinuance of DWS to such GEOP	MERALCO: <u>3.5.5. If the conditions under Sections 3.5.1 and 3.5.2 are not met, the Central Registration Body shall notify the GEOP End-user that it may not revert to the captive market within two (2) working days from receipt of the attestation Certification under Section 3.5.4.</u>	Please see our proposed revision.	Adopt IEMOP (to delete Sec. 3.5.5)

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					<p>End-User <u>shall become effective only at the end of the meter reading date of said GEOP End-User</u></p> <p>IEMOP: To align procedures for reversion to the Captive Market with the procedures for cessation of registration.</p> <p>Section 24 of ERC Resolution No. 8, Series of 2021 did not provide specific responsibilities for the CRB to verify conditions for reversion to the Captive Market</p>	<p>IEMOP: 3.5.5 If the conditions under Sections 3.5.1 and 3.5.2 are not met, the Central Registration Body shall notify the GEOP End-user that it may not revert to the captive market within two (2) working days from receipt of the attestation under Section 3.5.4.</p>		

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
SWITCHING TO A DISTRIBUTION UTILITY	(new)	(new)	<p><u>3.5.6 If the conditions under Sections 3.5.1 and 3.5.2. are met, the <i>Central Registration Body</i> shall notify the following of the effective date of reversion to the captive market within two (2) working days from receipt of the attestation under Section 3.5.4:</u></p> <p><u>a) the Distribution Utility,</u> <u>b) the incumbent Renewable Energy Supplier or Supplier of Last Resort, and</u> <u>c) the Retail Metering Services Provider.</u></p>		<p>MERALCO: To align with 3.5.5, the GEOP End-user should be notified as well</p> <p>Propose to REMOVE Attestation as it is NOT found in any ERC GEOP rules.</p> <p>IEMOP: To align procedures for reversion to the Captive Market with the procedures for cessation of registration.</p> <p>Section 24 of ERC Resolution No. 8, Series of 2021 did not provide specific responsibilities for the CRB to verify conditions for reversion to the Captive Market</p>	<p>MERALCO: To ADD: <u>d. the GEOP End-user</u></p> <p>IEMOP: 3.5.6 If the conditions under Sections 3.5.1 and 3.5.2. are met, the <i>Central Registration Body</i> shall notify the following of the effective date of reversion to the captive market within two (2) working days from receipt of the attestation under Section 3.5.4:</p>	Please see our proposed revision.	Adopt IEMOP (to delete Sec. 3.5.6)

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
						<p>a) the _____ Distribution Utility,</p> <p>b) the _____ incumbent Renewable _____ Energy Supplier or Supplier of Last Resort, and</p> <p>c) the Retail Metering Services Provider.</p>		
SWITCHING TO A DISTRIBUTION UTILITY	(new)	(new)	<p><u>3.5.7 The Central Registration Body shall de-register the GEOP End-User at the effective date of reversion to the Distribution Utility.</u></p>			<p>IEMOP: 3.5.7 The Central Registration Body shall de-register the GEOP End-User at the effective date of reversion to the Distribution Utility.</p> <p><u>3.5.4 The incumbent Renewable Energy Supplier or Supplier of Last Resort shall initiate the cessation of registration the GEOP End-User due to reversion to being a Captive End-User in accordance with procedures under Section 2.5.5 of this manual.</u></p>		Adopt IEMOP (proposed Sec. 3.5.4)

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
CUSTOMER RELOCATION	(new)	(new)	<p><u>3.6 CUSTOMER RELOCATION</u></p> <p><u>3.6.1 A GEOP End-User who intends to transfer to an new service address within the Distribution Utility's franchise area and wishes to continue receiving service from its Renewable Energy Supplier shall send a Request for Relocation of Service to its Renewable Energy Supplier, copy furnish the Central Registration Body, at least thirty (30) business days before the planned relocation date. The Request for Relocation of Service shall contain the following:</u></p> <p>a) <u>Address of the new location; and</u> b) <u>Intended date of transfer and the commencement of</u></p>	To align and thresh out details of Sections 19 and 20 of the ERC Resolution No. 8, Series of 2021.	<p>APC: Suggestions: [1] Please provide customer relocation form/s. [2] Correct the "therefor" spelling. And, the "te" word in 2.6.2.</p> <p>MERALCO: Minor revision</p> <p>IEMOP: We propose to align customer relocation procedures for RCOA and GEOP and to</p>	<p>MERALCO: <u>A GEOP End-User who intends to transfer to a an new service address within the Distribution Utility's franchise area and wishes to continue...</u></p> <p>IEMOP:</p>	<p>Agree to clerical corrections, for harmonization with our proposed revision.</p> <p>We do not have a prescribed template for the Request for Relocation since it is being submitted to the RE Supplier and the CRB is only furnished a copy.</p>	<ul style="list-style-type: none"> • Adopt original urgent amendment to be consistent with ERC GEOP Rules • Adopt clerical corrections from APC and MERALCO

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

			<p><u>service at the new location.</u></p> <p><u>Prior to sending the Request for Relocation of Service to its current Renewable Energy Supplier, the GEOP End-User should have performed due diligence in ensuring that the intended relocation site is within the Distribution Utility’s franchise area and distribution system. This does not, however, automatically allow such End-User to continue participating in GEOP unless the End-User’s new system complies with the threshold demand requirements as prescribed in the ERC Resolution No. 08, Series of 2021.</u></p>		<p>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).</p> <p>The RCOA relocation procedures will result to a more expeditious and efficient relocation process compared to the approved urgent amendments as the former allows the End-User, Supplier and NSP to agree first prior to submitting a relocation form to the CRB.</p> <p>For transparency, this proposed revision is in conflict with Clause 19.1 of the ERC GEOP Rules.</p>	<p>3.6 CUSTOMER RELOCATION</p> <p>3.6.1 A GEOP End-User who intends to transfer to a new service address within <u>or outside</u> the Distribution Utility’s franchise area and wishes to continue receiving service from its <i>Renewable Energy Supplier</i> shall send a prior Request for Relocation of Service to its <i>Renewable Energy Supplier</i> and the relevant Network Service Providers; copy furnish the Central Registration Body, at least thirty (30) business days before the planned relocation date. The Request for Relocation of Service shall contain the following:</p> <p>a) Address of the new location; and</p>		
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ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
						<p>b) Intended date of transfer and the commencement of service at the new location.</p> <p>Prior to sending the Request for Relocation of Service to its current <i>Renewable Energy Supplier</i>, the <i>GEOP End-User</i> should have performed due diligence in ensuring that the intended relocation site is within the <i>Distribution Utility's</i> franchise area and distribution system. This does not, however, automatically allow such <i>End-User</i> to continue participating in GEOP unless the <i>End-User's</i> new</p>		

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
						system complies with the threshold demand requirements as prescribed in the ERC Resolution No. 08, Series of 2021.		

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<p>CUSTOMER RELOCATION</p>	<p>(new)</p>	<p>(new)</p>	<p><u>3.6.2 The Renewable Energy Supplier shall inform the GEOP End-User whether it shall continue or discontinue its service at the GEOP End-User's new location within one (1) working day from receipt of the Request for Relocation of Service. In case of discontinuance, the reason therefor shall be provided by the Renewable Energy Supplier. Likewise, within the same period provided herein, the Renewable Energy Supplier shall send a copy of the GEOP End-User's Request for Relocation of Service, along with a notice to continue or discontinue the Renewable Energy Supplier's service to the Central Registration Body. In the event that the Renewable Energy Supplier opted not to continue the service at the new location, the GEOP</u></p>		<p>IEMOP: We propose to align customer relocation procedures for RCOA and GEOP 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). The RCOA relocation procedures will result to a more expeditious and efficient relocation process compared to the approved urgent amendments as the former allows the End-User, Supplier and NSP to agree first prior to submitting a relocation form to the CRB. Per ERC Resolution No. 08, Series of 2021 Section 25, failure to</p>	<p>IEMOP: 3.6.2 The Renewable Energy Supplier shall inform the GEOP End-User whether it shall continue or discontinue its service at the GEOP End-User's new location within one (1) working day from receipt of the Request for Relocation of Service. In case of discontinuance, the reason therefor shall be provided by the Renewable Energy Supplier. Likewise, within the same period provided herein, the Renewable Energy Supplier shall send a copy of the GEOP End-User's Request for Relocation of Service, along with a notice to continue or discontinue the Renewable Energy Supplier's service to the Central Registration Body. In the event that the Renewable Energy Supplier opted not to continue the service at the new location, the GEOP End-User shall;</p>		<p>Adopt original urgent amendment to be consistent with ERC GEOP Rules</p>
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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
			<u>End-User shall endeavor to find a new Renewable Energy Supplier and undergo the Switching Procedures under Section 3 of this Market Manual.</u>		<p>renew or secure a new supply contract is a Last Resort Supply Event. Meanwhile ERC Resolution No. 08, Series of 2021 Section 24 states that any Last Resort Supply Event is a ground for reversion to the Captive Market.</p> <p>For transparency, this proposed revision is in conflict with Clause 19.2 of the ERC GEOP Rules.</p>	<p><u>a) endeavor to find a new Renewable Energy Supplier and undergo the Switching Procedures under Section 3.3 or Section 3.4 of this Market Manual.; or</u> <u>b) if it fails to switch to a Supplier, the GEOP End-User may transfer to a Supplier of Last Resort in accordance with requirements and procedures set in Clause 3.9 or revert to being a Captive End-User in accordance with the requirements and procedures set in Clause 3.5 of this Market Manual.</u></p>		

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
CUSTOMER RELOCATIO N	(new)	(new)	<p>3.6.3 <u>If the <i>Renewable Energy Supplier</i> shall continue its service, the Central Registration Body shall forward the Request for Relocation of Service to the <i>Distribution Utility</i> within one (1) working day from receipt of the notice from the <i>Renewable Energy Supplier</i>.</u></p> <p><u>The <i>Distribution Utility</i> shall send notice of approval or disapproval of such request to the <i>Renewable Energy Supplier</i> through the Central Registration Body within two (2) working days from receipt of the Central Registration Body's notice. In case of approval, the <i>Renewable Energy Supplier</i> shall enter into negotiations with the <i>Distribution Utility</i> and that they shall have a perfected</u></p>		<p>APC: Correct the typo error: "says" to "days".</p> <p>IEMOP: We propose to align customer relocation procedures for RCOA and GEOP 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).</p> <p>The RCOA relocation procedures will result to a more expeditious and efficient relocation process compared to the approved urgent amendments as the former allows the End-User, Supplier</p>	IEMOP:	<p>APC: Agree to clerical correction</p>	<p>Adopt original urgent amendments to be consistent with ERC GEOP Rules, with clerical revision:</p> <p>xxx <u>In case of approval, the <i>Renewable Energy Supplier</i> shall enter into negotiations with the <i>Distribution Utility</i> and that they shall have a perfected <i>Distribution Wheeling Services Agreement</i> within three (3) working days says from receipt of the notice of the approval.</u></p> <p>xxx</p>

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
			<p><u>Distribution Wheeling Services Agreement within three (3) working days from receipt of the notice of the approval.</u></p> <p><u>The Distribution Utility shall then send a notice to the Central Registration Body that the Distribution Wheeling Services Agreement has been perfected and the effective date and time for the commencement of the service in the new location within two (2) working days from perfection of the Distribution Wheeling Services Agreement.</u></p>		<p>and NSP to agree first prior to submitting a relocation form to the CRB.</p> <p>For transparency, this proposed revision is in conflict with Clause 19.3 of the ERC GEOP Rules.</p>	<p>3.6.3 If the <i>Renewable Energy Supplier</i> shall continue its service, the parties shall notify the Central Registration Body through submission of a Customer Relocation Form. The parties shall effect the relocation in accordance with the requirements and procedures set by the relevant Network Service Providers. shall forward the Request for Relocation of Service to the <i>Distribution Utility</i> within one (1) working day from receipt of the notice from the <i>Renewable Energy Supplier</i>.</p> <p>The <i>Distribution Utility</i> shall send notice of approval or disapproval</p>		

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
						<p>of such request to the <i>Renewable Energy Supplier</i> through the Central Registration Body within two (2) working days from receipt of the Central Registration Body's notice. In case of approval, the <i>Renewable Energy Supplier</i> shall enter into negotiations with the Distribution Utility and that they shall have a perfected Distribution Wheeling Services Agreement within three (3) working days from receipt of the notice of the approval.</p> <p>The <i>Distribution Utility</i> shall then send a notice to the <i>Central Registration Body</i> that the Distribution Wheeling Services Agreement has been perfected and the effective date and time for</p>		

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
						the commencement of the service in the new location within two (2) working days from perfection of the Distribution Wheeling Services Agreement.		
CUSTOMER RELOCATION	(new)	(new)	<u>3.6.4 The Central Registration Body shall forward the Distribution Utility's notice of perfection of the Distribution Wheeling Services Agreement to the Renewable Energy Supplier within one (1) working day from receipt of such notice and the Renewable Energy Supplier shall then forward the notice to its GEOP End-User within one (1) working day from receipt thereof.</u>		<p>IEMOP: We propose to align customer relocation procedures for RCOA and GEOP 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).</p> <p>The RCOA relocation procedures will result to a more expeditious and efficient relocation process compared to the approved urgent amendments as the</p>	<p>IEMOP: 3.6.4 The Central Registration Body shall forward the Distribution Utility's notice of perfection of the Distribution Wheeling Services Agreement to the Renewable Energy Supplier within one (1) working day from receipt of such notice and the Renewable Energy Supplier shall then forward the notice to its GEOP End-User within one (1) working day from receipt thereof.</p>		Adopt original urgent amendments to be consistent with ERC GEOP Rules

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(NEW) Retail Manual on GEOP Procedures								
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					<p>former allows the End-User, Supplier and NSP to agree first prior to submitting a relocation form to the CRB.</p> <p>For transparency, this proposed revision is in conflict with Clause 19.4 of the ERC GEOP Rules.</p>			
CUSTOMER RELOCATION	(new)	(new)	<u>3.6.5 The Distribution Utility and GEOP End-User shall have a new connection agreement at the new location. The relocation date shall take into consideration the Distribution Utility's completion of connection facilities at the new location.</u>		<p>IEMOP: We propose to align customer relocation procedures for RCOA and GEOP 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).</p>	<p>IEMOP: 3.6.5 The Distribution Utility and GEOP End-User shall have a new connection agreement at the new location. The relocation date shall take into consideration the Distribution Utility's completion of connection facilities at the new location.</p>		Adopt original urgent amendments to be consistent with ERC GEOP Rules

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(NEW) Retail Manual on GEOP Procedures								
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					<p>The RCOA relocation procedures will result to a more expeditious and efficient relocation process compared to the approved urgent amendments as the former allows the End-User, Supplier and NSP to agree first prior to submitting a relocation form to the CRB.</p> <p>For transparency, this proposed revision is in conflict with Clause 19.5 of the ERC GEOP Rules.</p>			

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
CUSTOMER RELOCATION	(new)	(new)	<u>3.6.6 A GEOP End-User who intends to transfer to a new service address in another franchise area and wishes to continue receiving service from its Renewable Energy Supplier shall be governed by the procedures for new applications as provided in this Market Manual.</u>		<p>IEMOP: We propose to align customer relocation procedures for RCOA and GEOP 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).</p> <p>The RCOA relocation procedures will result to a more expeditious and efficient relocation process compared to the approved urgent amendments as the former allows the End-User, Supplier and NSP to agree first prior to submitting a relocation form to the CRB.</p>	<p>IEMOP: 3.6.6 A GEOP End-User who intends to transfer to a new service address in another franchise area and wishes to continue receiving service from its Renewable Energy Supplier shall be governed by the procedures for new applications as provided in this Market Manual</p>		Adopt original urgent amendments to be consistent with ERC GEOP Rules

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					For transparency, this proposed revision is in conflict with Section 20 of the ERC GEOP Rules.			
PROHIBITED GEOP END-USER TRANSFER	(new)	(new)	<p><u>3.7 PROHIBITED GEOP END-USER TRANSFER</u></p> <p><u>A Renewable Energy Supplier shall not be permitted to transfer a GEOP End-User to another Renewable Energy Supplier without the authorization of the affected GEOP End-User and without complying with the switching requirements and procedures set out in Section 3.3.</u></p>	To align with Section 19 of ERC Resolution No. 08, Series of 2021	<p>MERALCO: Include 2nd paragraph of Section 21 to capture penalty in case of the prohibited commercial transfer.</p>	<p>MERALCO: To ADD: <u>The GEOP End-User shall file a complaint with the ERC, in the event a prohibited GEOP End-User transfer has occurred.</u></p>	<p>MERALCO: Agree.</p>	Adopt original urgent amendments and additional paragraph from MERALCO

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
TERMINATION OF SUPPLY	(new)	(new)	<u>3.8 TERMINATION OF SUPPLY</u> <u>3.8.1 If a <i>GEOP End-User</i> decides to terminate its <i>GEOP Supply Contract</i> with its <i>Renewable Energy Supplier</i> before the end of the term of the <i>GEOP Supply Contract</i>, the <i>GEOP End-User</i> shall inform the <i>Renewable Energy Supplier</i> and the latter shall process the termination of the <i>GEOP Supply contract</i> in accordance with the <i>Termination Clause</i> of such contract.</u>	To align with Sections 20, 21 and 22 of ERC Resolution No. 08, Series of 2021				Adopt original urgent amendments
TERMINATION OF SUPPLY	(new)	(new)	<u>3.8.2 The <i>Renewable Energy Supplier</i> shall then submit a Notice of Pre-termination of <i>GOEP Supply Contract</i> to the <i>Central Registration Body</i> within one (1) <i>working day</i> from the effectivity of the pre-termination.</u>		APC: Correct the typo error GOEP to GEOP. IEMOP: We propose to align procedures for termination of supply	IEMOP: The <i>Renewable Energy Supplier</i> shall then	Agree.	Adopt original urgent amendments to be consistent with ERC GEOP Rules, with correction from APC.

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(NEW) Retail Manual on GEOP Procedures								
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					<p>for RCOA and GEOP 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).</p> <p>For transparency, this proposed revision is in conflict with Clause 22.2 of the ERC GEOP Rules.</p>	<p>submit a Notice of Pre-termination of GOEP GEOP Supply Contract to the <i>Central Registration Body</i> and the relevant Network Service Provider within one (1) working day from prior the effectivity of the pre-termination.</p>		

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
TERMINATION OF SUPPLY	(new)	(new)	3.8.3 <u>The <i>Central Registration Body</i> shall forward the notice to the <i>Network Service Provider</i> within one (1) working day from receipt of the GEOP Supply Contract Termination Notice. The <i>Network Service Provider</i> and the <i>Renewable Energy Supplier</i> or <i>GEOP End-User</i> shall act on the termination of the <i>Distribution Wheeling Services Agreement</i> or <i>Transmission Service Agreement</i> for that <i>GEOP End-User</i> within three (3) working days.</u>		<p>MERALCO: The effective date of termination of DWSA should coincide with what is provided in Section 22 of the DWSA.</p> <p>IEMOP: We propose to align procedures for termination of supply for RCOA and GEOP 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).</p> <p>For transparency, this proposed revision is in conflict with Clause</p>	<p>IEMOP: 3.8.3 The <i>Central Registration Body</i> shall forward the notice to the <i>Network Service Provider</i> within one (1) working day from receipt of the GEOP Supply Contract Termination Notice. The <i>Network Service Provider</i> and the <i>Renewable Energy Supplier</i> or <i>GEOP End-User</i> shall act on the termination of the <i>Distribution Wheeling Services Agreement</i> or <i>Transmission Service</i></p>	Please see our proposed revision.	<ul style="list-style-type: none"> Adopt original urgent amendments to be consistent with ERC GEOP Rules. IEMOP suggested that MERALCO should raise its comment with the ERC

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					22.3 of the ERC GEOP Rules.	Agreement for that GEOP End-User within three (3) working days.		
TERMINATION OF SUPPLY	(new)	(new)	<u>3.8.4 If the Renewable Energy Supplier does not intend to renew the supply contract upon its expiration, the Renewable Energy Supplier shall send a Notice of Non-Renewal to the GEOP End-User and the Central Registration Body at least thirty (30) business days prior to the expiration of the said supply contract.</u>		<p>PEMC</p> <p>Please include the last sentence of Section 23 of the ERC Order.</p> <p>MERALCO: Same comment as above, the Supplier should also inform the DU on its intention not to renew its supply contract with the Retail Customer since it will have an effect</p>	<p>PEMC</p> <p>2nd paragraph of Section 3.8.4</p> <p><u>The Central Registration Body shall forward to the Network Service Provider the Notice of Non-Renewal, within one (1) business day from receipt thereof.</u></p>	Please see our proposed revision on procedures for Termination of Supply for harmonization with RCOA procedures.	Adopt original urgent amendments and additional paragraph as suggested by PEMC

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					<p>on the effectivity of other contracts.</p> <p>IEMOP: Re-numbering</p>	<p>IEMOP: 3.8.4 3.8.3 If the <i>Renewable Energy Supplier</i> does not intend to renew the supply contract upon its expiration, the <i>Renewable Energy Supplier</i> shall send a Notice of Non-Renewal to the <i>GEOP End-User</i> and the <i>Central Registration Body</i> at least thirty (30) <i>business days</i> prior to the expiration of the said supply contract.</p>		

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
TERMINATION OF SUPPLY	(new)	(new)	3.8.5 <u>The <i>Central Registration Body</i> shall also notify the relevant <i>Renewable Energy Supplier</i> of the forthcoming expiration of its GEOP Supply Contract with a <i>GEOP End-User</i> thirty (30) business days prior to the expiration of its existing GEOP supply contract.</u>		IEMOP: We propose to align procedures for termination of supply for RCOA and GEOP and to adopt the procedures as approved by DOE in	APC: The <i>Central Registration Body</i> shall also notify the relevant <i>Renewable Energy Supplier</i> of the forthcoming expiration of its GEOP Supply Contract with a <i>GEOP End-User</i> thirty (30) sixty (60) business days prior to the expiration of its existing GEOP supply contract. IEMOP: 3.8.5. The <i>Central Registration Body</i> shall also notify the relevant <i>Renewable Energy Supplier</i> of the forthcoming expiration of its GEOP Supply Contract with a <i>GEOP End-User</i> thirty (30) business days prior to the expiration of its	Please see our proposed revision to this procedure.	Adopt original urgent amendments to be consistent with ERC GEOP Rules

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					<p>DC2021-06-0012 (Amendments to WESM Rules, Retail Rules and Manuals on Provisions to Promote Participation in Retail Competition).</p> <p>For transparency, this proposed revision is in conflict with Clause 23.5 of the ERC GEOP Rules.</p>	<p>existing GEOP supply contract.</p>		
TERMINATION OF SUPPLY	(new)	(new)	<p><u>3.8.6 In case of termination of the supply contract, the GEOP End-User may:</u></p> <p><u>a) Switch to a new Supplier in accordance with the requirements and procedures under Sections 3.2 or 3.3; or</u></p> <p><u>b) Revert to being a Captive End-User in accordance with the requirements and</u></p>		<p>IEMOP: Per ERC Resolution No. 08, Series of 2021 Section 25, failure to renew or secure a new supply contract is a Last Resort Supply Event. Meanwhile ERC Resolution No. 08, Series of 2021 Section 24 states that any Last Resort Supply Event is a</p>	<p>IEMOP: 3.8.6 3.8.4 In case of termination of the supply contract, the <i>GEOP End-User</i> may:</p> <p>a) Switch to a new <i>Supplier</i> in accordance with the requirements and procedures under Sections 3.2 or 3.3</p>		Adopt IEMOP's further revisions to the original urgent amendments

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
			<u>procedures set in Clause 3.5.</u>		ground for reversion to the Captive Market.	<u>of this Market Manual</u> ; or a) Revert to being a <i>Captive End-User</i> in accordance with the requirements and procedures set in Clause 3.5 <u>of this Market Manual</u> ; or a) <u>Transfer to a Supplier of Last Resort in accordance with requirements and procedures set in Clause 3.9 of this Market Manual.</u>		
TRANSFER TO A SUPPLIER OF LAST RESORT	(new)	(new)	<u>3.9 TRANSFER TO A SUPPLIER OF LAST RESORT</u> <u>3.9.1 A GEOP End-User shall be transferred to a Supplier of Last Resort upon occurrence of any one of the following Last Resort Supply Events:</u>	To align with Section 25 of ERC Resolution No. 08, Series of 2021	APC: Please ensure consistency in item numbering of Sections. Should be 2.9.1. Preceding section is 2.9.		Defer to RCC Secretariat.	Adopt urgent amendments, and re-numbering

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			<p>a) <u>the Renewable Energy Supplier has ceased to operate;</u></p> <p>b) <u>the Renewable Energy Supplier's license has been revoked by the ERC;</u></p> <p>c) <u>the Renewable Energy Supplier's operating permit has been revoked by the DOE;</u></p> <p>d) <u>the Renewable Energy Supplier is no longer permitted to trade in the WESM due to suspension, deregistration or cessation of membership;</u></p> <p>e) <u>the Wheeling Services Agreement between the Renewable Energy Supplier and Distribution Utility has been terminated;</u></p> <p>f) <u>the Transmission Service Agreement between the Renewable Energy Supplier/GEOP End-User and TRANSCO or its successors-in-interest or</u></p>				
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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
			<p><u>concessionaire has been terminated;</u></p> <p><u>g) Failure to renew or secure a new GEOP Supply Contract; or</u></p> <p><u>h) any other analogous event which the ERC may deem as a Last Resort Supply Event.</u></p>					
TRANSFER TO A SUPPLIER OF LAST RESORT	(new)	(new)	<p><u>3.9.2 Upon the occurrence of any of the Last Resort Supply Events, the Renewable Energy Supplier shall notify the Central Registration Body, submitting relevant documents as proof, and the GEOP End-User within the hour of discovery of the happening of the Last Resort Supply Event.</u></p>		<p>APC: Please ensure consistency in item numbering of Sections. Should be 2.9.2. Preceding correct section is 2.9.1</p> <p>IEMOP: We retain our previous proposal to harmonize procedures for transfer to SOLR p for both RCOA and GEOP participants and to adopt the timelines as provided</p>	<p>IEMOP: Upon the occurrence of any of the Last Resort Supply Events, the Renewable Energy Supplier shall notify the Central Registration Body, submitting relevant documents as</p>	Defer to RCC Secretariat.	Adopt original urgent amendments to be consistent with ERC GEOP Rules, and re-numbering

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					<p>in the ERC GEOP Rules in conjunction with 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).</p> <p>For transparency, this proposed revision is in conflict with Clause 26.1 of the ERC GEOP Rules.</p>	<p>proof, and the <i>GEOP End-User</i> within the hour of discovery of the happening of the Last Resort Supply Event.</p> <p><u>When the Central Registration Body receives notice of the occurrence of a last resort event, it shall notify the affected <i>GEOP End-User</i>, the <i>Supplier of Last Resort</i>, and the defaulting Supplier if practicable, of the occurrence and the effective date of the transfer of the <i>GEOP End-User</i> to the <i>Supplier of Last Resort</i>.</u></p>		

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
TRANSFER TO A SUPPLIER OF LAST RESORT	(new)	(new)	<u>3.9.3 Within two (2) working days from receipt of the notice under Section 3.9.2, the GEOP End-User shall inform the Central Registration Body whether or not it will avail of the service from a Supplier of Last Resort.</u>		APC: Ensure consistency in item/section numbering.		Defer to RCC Secretariat.	Adopt original urgent amendments to be consistent with ERC GEOP Rules, and re-numbering
TRANSFER TO A SUPPLIER OF LAST RESORT	(new)	(new)	<u>3.9.4 Upon receipt of notice from the Retail Customer under the Green Energy Option Program and determination of the occurrence of a last resort event, the Central Registration Body shall send notices to the Retail Customer and Supplier of Last Resort within one (1) working day of the effective date of the Retail Customer's transfer to the latter.</u>		APC: Ensure consistency in item/section numbering. IEMOP: We retain our previous proposal to harmonize procedures for transfer to SOLR p for both RCOA and GEOP participants and to adopt the timelines as provided in the ERC GEOP Rules in conjunction with procedures as approved by DOE in DC2021-06-0012 (Amendments to	IEMOP: 3.9.4 Upon receipt of notice from the Retail Customer under the Green Energy Option Program and determination of the occurrence of a last resort event, the Central Registration Body shall send notices to the Retail Customer and Supplier of Last	Defer to RCC Secretariat.	Adopt original urgent amendments to be consistent with ERC GEOP Rules, and re-numbering

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					<p>WESM Rules, Retail Rules and Manuals on Provisions to Promote Participation in Retail Competition).</p> <p>For transparency, this proposed revision is in conflict with Clause 26.3(a) of the ERC GEOP Rules.</p>	<p>Resort within one (1) working day of the effective date of the Retail Customer's transfer to the latter.</p>		
TRANSFER TO A SUPPLIER OF LAST RESORT	(new)	(new)	<p><u>3.9.5 Within one (1) working day upon receiving notice from the GEOP End-User under Section 3.9.4, the Supplier of Last Resort shall inform the GEOP End-User of the terms of its supply contract and the applicable rates.</u></p>		<p>APC: Ensure consistency in item/section numbering.</p> <p>IEMOP: Re-numbering</p>	<p>IEMOP:</p>	Defer to RCC Secretariat.	Adopt original urgent amendments, and re-numbering

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
						<p>3.9.5 3.9.4 Within one (1) working day upon receiving notice from the GEOP End-User under Section 3.9.4.3, the Supplier of Last Resort shall inform the GEOP End-User of the terms of its supply contract and the applicable rates.</p>		

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(NEW) Retail Manual on GEOP Procedures								
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TRANSFER TO A SUPPLIER OF LAST RESORT	(new)	(new)	<u>3.9.5 Within two (2) working days upon receiving notice from the GEOP End-User under Section 3.9.4, the Supplier of Last Resort shall submit a switch request for the transfer of the GEOP End-User accompanied by all requirements enumerated under Section 16.2 of ERC Resolution No. 08 Series of 2021, if applicable.</u>		<p>APC: Ensure consistency in item/section numbering. Same number as the preceding section.</p> <p>IEMOP: We retain our previous proposal to harmonize procedures for transfer to SOLR p for both RCOA and GEOP participants and to adopt the timelines as provided in the ERC GEOP Rules in conjunction with 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).</p> <p>For transparency, this proposed revision is in conflict with Clause</p>	<p>IEMOP: 3.9.5 Within two (2) one (1) working days upon receiving notice from the GEOP End-User under Section 3.9.4 after the requirement under Clause 3.9.4 have been fulfilled, the Supplier of Last Resort shall submit a switch request for the transfer of the GEOP End-User accompanied by all requirements enumerated under Section 16.2 of ERC Resolution No. 08 Series of 2021, if applicable in</p>	Defer to RCC Secretariat.	Adopt original urgent amendments to be consistent with ERC GEOP Rules with IEMOP's further revisions, and re-numbering <u>3.9.5 Within two (2) working days upon receiving notice from the GEOP End-User under Section 3.9.4, the Supplier of Last Resort shall submit a switch request for the transfer of the GEOP End-User in accordance with applicable requirements and procedures under Section 3.3 of this Market Manual, accompanied by all requirements enumerated under Section 16.2 of</u>

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
					26.3(a) of the ERC GEOP Rules.	accordance with applicable requirements and procedures under Section 3.3 of this Market Manual.		ERC Resolution No. 08 Series of 2021, if applicable.
TRANSFER TO A SUPPLIER OF LAST RESORT	(new)	(new)	<u>3.9.6 Upon evaluation, the Central Registration Body shall either approve or disapprove the switch request in accordance with switching procedures under Clauses 3.3.3.4 to 3.3.3.12 of this Manual.</u>		<p>APC: Ensure consistency in item/section numbering.</p> <p>IEMOP: Re-numbering of reference clause</p>	<p>IEMOP: 3.9.6 Upon evaluation, the Central Registration Body shall either approve or disapprove the switch request in accordance with switching procedures under Clauses 3.3.3.4 to 3.3.3.12 of this Manual under Section 3.3 of this Market Manual.</p>	Defer to RCC Secretariat.	<p>Adopt original urgent amendments to be consistent with ERC GEOP Rules with IEMOP's further revisions, and re-numbering</p> <p><u>3.9.6 Upon evaluation, the Central Registration Body shall either approve or disapprove the switch request in accordance with switching procedures under Section 3.3 of this Market Manual.</u> <u>under Clauses</u></p>

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
								3.3.3.4 to 3.3.3.12 of this Manual.
TRANSFER TO A SUPPLIER OF LAST RESORT	(new)	(new)	<u>3.9.7 GEOP End-Users who opt not to avail or fail to transfer to a Supplier of Last Resort shall revert to being a Captive End-user, subject to conditions and procedures under Section 3.5.</u>		APC: Ensure consistency in item/section numbering.		Defer to RCC Secretariat.	Adopt original urgent amendments and re-numbering
DISCONNECTION AND RECONNECTION	(new)	(new)	<u>3.10 DISCONNECTION AND RECONNECTION</u>	To align with Sections 37 to 42 of ERC Resolution No. 08, Series of 2021	APC: Ensure consistency in item/section numbering. IEMOP: We propose to delete this section to align disconnection and reconnection procedures for RCOA and GEOP. We note that there are no disconnection and reconnection procedures for RCOA	IEMOP: 3.10 DISCONNECTION AND RECONNECTION 3.10.1 In the event that a GEOP End-User fails to pay its Renewable Energy Supplier in accordance with their supply contract, the	Defer to RCC Secretariat.	Adopt original urgent amendments to be consistent with ERC GEOP Rules, and re-numbering

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(NEW) Retail Manual on GEOP Procedures								
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			<p><u>3.10.1 In the event that a <i>GEOP End-User</i> fails to pay its <i>Renewable Energy Supplier</i> in accordance with their supply contract, the <i>Renewable Energy Supplier</i> shall send a notice of disconnection to the <i>GEOP End-User</i> and the <i>Central Registration Body</i> 48 hours prior to disconnection.</u></p>		<p>in DC2021-06-0012 (Amendments to WESM Rules, Retail Rules and Manuals on Provisions to Promote Participation in Retail Competition) and instead refers to prevailing rules and regulations such as the DSOAR.</p> <p>For transparency, this proposed revision is in conflict with Section 37 of the ERC GEOP Rules.</p>	<p><i>Renewable Energy Supplier</i> shall send a notice of disconnection to the <i>GEOP End-User</i> and the <i>Central Registration Body</i> 48 hours prior to disconnection.</p>		

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DISCONNECTION AND RECONNECTION	(new)	(new)	<u>3.10.2 Upon receipt of the notice under Clause 3.11.1, the Central Registration Body shall forward the notice of disconnection to the Network Service Provider of the GEOP End-User within 24 hours from such receipt.</u>		<p>APC: Ensure consistency in item/section numbering.</p> <p>IEMOP: Same comment as above</p> <p>For transparency, this proposed revision is in conflict with Section 37 of the ERC GEOP Rules.</p>	<p>IEMOP: 3.10.2 Upon receipt of the notice under Clause 3.11.1, the Central Registration Body shall forward the notice of disconnection to the Network Service Provider of the GEOP End-User within 24 hours from such receipt.</p>	Defer to RCC Secretariat.	Adopt original urgent amendments to be consistent with ERC GEOP Rules, and re-numbering

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(NEW) Retail Manual on GEOP Procedures								
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DISCONNECTION AND RECONNECTION	(new)	(new)	3.10.3 Upon <u>determination that the GEOP End-User has not settled its obligation within the 48-hour period, the Renewable Energy Supplier shall send a request for disconnection to the Central Registration Body.</u>		<p>APC: Ensure consistency in item/section numbering.</p> <p>Correct the typo error "it" to "its".</p> <p>MERALCO: Minor revision</p> <p>IEMOP: Same comment as above</p> <p>For transparency, this proposed revision is in conflict with Section 37 of the ERC GEOP Rules.</p>	<p>MERALCO: <u>3.10.3. Upon determination that the GEOP End-User has not settled its obligation within the 48-hour period.</u></p> <p>IEMOP: <u>3.10.3 Upon determination that the GEOP End-User has not settled its obligation within the 48-hour period, the Renewable Energy Supplier shall send a request for disconnection to the Central Registration Body.</u></p>	<p>Defer to RCC Secretariat on item/section numbering.</p> <p>Please see our proposed revision to this Section.</p>	<p>Adopt original urgent amendments to be consistent with ERC GEOP Rules, with clerical correction and re-numbering</p> <p>Upon <u>determination that the GEOP End-User has not settled its obligation within the 48-hour period, the Renewable Energy Supplier shall send a request for disconnection to the Central Registration Body.</u></p>

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(NEW) Retail Manual on GEOP Procedures								
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DISCONNECTION AND RECONNECTION	(new)	(new)	3.10.4 <u>Upon receipt of the request under Clause 3.11.3, the Central Registration Body shall forward the request for disconnection to the Network Service Provider of the GEOP End-User within 24 hours.</u>		<p>APC: Ensure consistency in item/section numbering.</p> <p>IEMOP: Same comment as above</p> <p>For transparency, this proposed revision is in conflict with Section 37 of the ERC GEOP Rules.</p>	<p>IEMOP: 3.10.4 Upon receipt of the request under Clause 3.11.3, the Central Registration Body shall forward the request for disconnection to the Network Service Provider of the GEOP End-User within 24 hours.</p>	Defer to RCC Secretariat on item/section numbering.	Adopt original urgent amendments to be consistent with ERC GEOP Rules, and re-numbering

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DISCONNECTION AND RECONNECTION	(new)	(new)	3.10.5 <u>The Network Service Provider shall disconnect the GEOP End-User within 24 hours from receipt of the request for disconnection and notify the Central Registration Body of the disconnection.</u>		<p>APC: Ensure consistency in item/section numbering.</p> <p>MERALCO: Harmonize with ERC GEOP rules section 37.5</p>	<p>MERALCO: To ADD: xxx <u>notify the Central Registration Body of the disconnection. The NSP shall not be responsible for verifying the validity of the RE Supplier's request for disconnection.</u></p>	<p>Defer to RCC Secretariat on item/section numbering.</p> <p>Please see our proposed revision to this Section.</p>	<p>Adopt original urgent amendments to be consistent with ERC GEOP Rules, MERALCO's additional sentence, and re-numbering</p> <p><u>The Network Service Provider shall disconnect the GEOP End-User within 24 hours from receipt of the request for disconnection and notify the Central Registration Body of the disconnection. The NSP shall not be responsible for verifying the validity of the RE Supplier's request for disconnection.</u></p>

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DISCONNECTION AND RECONNECTION	(new)	(new)	3.10.6 <u>Upon determination that the grounds for disconnection of the GEOP End-User has been remedied, the Renewable Energy Supplier shall immediately submit a request for reconnection to the Central Registration Body.</u>		<p>APC: Ensure consistency in item/section numbering.</p> <p>IEMOP: Same comment as above</p> <p>For transparency, this proposed revision is in conflict with Section 40 of the ERC GEOP Rules.</p>	<p>IEMOP: 3.10.6 Upon determination that the grounds for disconnection of the GEOP End-User has been remedied, the Renewable Energy Supplier shall immediately submit a request for reconnection to the Central Registration Body.</p>		Adopt original urgent amendments to be consistent with ERC GEOP Rules, and re-numbering

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DISCONNECTION AND RECONNECTION	(new)	(new)	3.10.7 <u>Upon receipt of the request under Clause 3.11.6, the Central Registration Body shall forward the request for reconnection to the Network Service Provider of the GEOP End-User within 24 hours.</u>		<p>APC: Ensure consistency in item/section numbering.</p> <p>IEMOP: Same comment as above</p> <p>For transparency, this proposed revision is in conflict with Section 40 of the ERC GEOP Rules.</p>	<p>IEMOP: 3.10.7 Upon receipt of the request under Clause 3.11.6, the Central Registration Body shall forward the request for reconnection to the Network Service Provider of the GEOP End-User within 24 hours.</p>	Defer to RCC Secretariat on item/section numbering.	Adopt original urgent amendments to be consistent with ERC GEOP Rules, and re-numbering

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(NEW) Retail Manual on GEOP Procedures								
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REPORTING	(new)	(new)	<p><u>3.11 REPORTING</u></p> <p><u>3.11.1 The Central Registration Body shall submit to the ERC every 15th day after the end of each month a report which shows the registration and transactions of Renewable Energy Suppliers and GEOP End-Users.</u></p> <p><u>3.11.2 The Central Registration Body shall submit Quarterly Reports to the ERC, every 15th day of the month following the quarter in review, which shall include the following information:</u></p>	To align with Section 47 of ERC Resolution No. 08, Series of 2021	<p>APC: Ensure consistency in item/section numbering.</p> <p>IEMOP: Re-numbering</p>	<p>IEMOP: 3.113.10 REPORTING</p> <p>3.11.1 3.10.1 The Central Registration Body shall submit to the ERC every 15th day after the end of each month a report which shows the registration records and database as listed in Section 2.3 and transactions of Renewable Energy Suppliers and GEOP End-Users.</p>	Defer to RCC Secretariat on item/section numbering.	Adopt original urgent amendments with IEMOP's further revision to Sec. 3.11.1 (to be 3.10.1), and re-numbering

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			<p>a) <u>List of GEOP End-Users' name served by each Renewable Energy Supplier;</u> b) <u>Meter number;</u> c) <u>Monthly registered demand (in kW);</u> d) <u>Monthly metered quantity (in kWh);</u> e) <u>Number of GEOP End-Users that switched, sorted by the Distribution Utility franchise area;</u> f) <u>Percent (%) increase in switching per Distribution Utility franchise area;</u></p> <p><u>3.11.3 The Central Registration Body shall provide any</u></p>			<p>3.11.2 <u>3.10.2</u> The Central Registration Body shall submit Quarterly Reports to the ERC, every 15th day of the month following the quarter in review, which shall include the following information:</p> <p>a) List of GEOP End-Users' name served by each Renewable Energy Supplier; b) Meter number; c) Monthly registered demand (in kW); d) Monthly metered quantity (in kWh); e) Number of GEOP End-Users that switched, sorted by the Distribution Utility franchise area; f) Percent (%) increase in switching per Distribution Utility franchise area;</p> <p>3.11.3 <u>3.10.3</u> The Central Registration Body shall provide any other information that</p>		
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ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
			<p><u>other information that the ERC deems necessary or useful in carrying out its duties and obligations.</u></p> <p><u>3.11.4 The ERC shall accord certain information disclosed and identified by the respective entities such level of strict confidentiality by subjecting the same to appropriate protective measures, as may be applicable.</u></p>			<p>the ERC deems necessary or useful in carrying out its duties and obligations.</p> <p>3.11.4 3.10.4 The ERC shall accord certain information disclosed and identified by the respective entities such level of strict confidentiality by subjecting the same to appropriate protective measures, as may be applicable.</p>		

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DISPUTES	(new)	(new)	<p><u>3.12 DISPUTES</u></p> <p><u>3.12.1 In case of emergencies affecting the operation of the Central Registration and Settlement System, the Central Registration Body shall provide notice to the ERC, Network Service Providers, Metering Service Providers and Renewable Energy Suppliers by email and/or publication in the market information website of such fact within one (1) hour from its occurrence. During such event, transactions shall be done through electronic mail, fax or other means of communication</u></p>	<p>To align with Article XII of ERC Resolution No. 08, Series of 2021</p>	<p>APC: Ensure consistency in item/section numbering.</p> <p>IEMOP: Renumbering</p>	<p>IEMOP: 3.123.11 DISPUTES</p> <p>3.12.1 3.11.1 In case of emergencies affecting the operation of the Central Registration and Settlement System, the Central Registration Body shall provide notice to the ERC, Network Service Providers, Metering Service Providers and Renewable Energy Suppliers by email and/or publication in the market information website of such fact within one (1) hour from its occurrence. During such event, transactions shall be done through electronic mail, fax or other means of communication</p>	<p>Defer to RCC Secretariat on item/section numbering.</p>	<p>Adopt original urgent amendments, and re-numbering</p>
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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
			<p><u>capable of time stamping.</u></p> <p><u>3.12.2 In case of discrepancies in data, data from the Network Service Provider and Retail Metering Services Provider shall be used while the dispute is being investigated by ERC.</u></p> <p><u>3.12.3 Requests, notices, responses and data sent or received by the Central Registration Body beyond 5:00 PM shall be deemed to have been sent or received on the first working hour of the next working day.</u></p>			<p>capable of time stamping.</p> <p>3.12.2 3.11.2 In case of discrepancies in data, data from the Network Service Provider and Retail Metering Services Provider shall be used while the dispute is being investigated by ERC.</p> <p>3.12.3 3.11.3 Requests, notices, responses and data sent or received by the Central Registration Body beyond 5:00 PM shall be deemed to have been sent or received on the first working hour of the next working day.</p>		

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
METERING	(new)	(new)	<p>4 SECTION 4 <u>METERING</u></p> <p><u>The metering installation standards, the procedures for the registration, collection, validation and profiling of metering data of GEOP End-Users for use in WESM settlements and the performance management of Retail Metering Services Provider serving GEOP End-Users shall conform with Chapter 4 of the Retail Rules, the Retail Manual on Metering Standards and Procedures, and as applicable, the Philippine Grid Code, the Philippine Distribution Code, Open Access Transmission Service Rules, the WESM Rules and the WESM Manual on Metering</u></p>	To align with Section 8 of ERC Resolution No. 08, Series of 2021	<p>APC: Ensure consistency in item/section numbering.</p> <p>NREB-TWG: Does this sufficiently address the discrepancy between the interval meter required by the Retail Rules and the 5-minute meter required by ERC Resolution No. 8, Series of 2021?</p> <p>Can it be clearly specified that the RCOA interval meters will suffice for GEOP also?</p>		<p>Defer to RCC Secretariat on item/section numbering.</p> <p>NREB-TWG: Please see our proposed revision to Clause 2.3 of the Retail Manual on Metering Standards and Procedures. For easy reference, we have pasted it below:</p> <p>“This Manual supplements the minimum requirements in the <i>Philippine Distribution Code</i> and relevant ERC issuances for metering installations of <i>Retail Customers</i>.</p> <p><i>Any metering installation</i> of a higher level of accuracy or functionality than the standards in the</p>	Adopt original urgent amendments, and re-numbering

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
			<u>Standards and Procedures.</u>				<p><i>Philippine Distribution Code</i> and relevant ERC issuances and this standard may also be installed.</p> <p><u>For Retail Customers under the Green Energy Option Program, the Retail Metering Services Provider shall install a meter capable of registering energy use and demand recorded at 5-minute intervals. Existing metering installations that are non-compliant with this requirement shall be governed by Section 2.7 of this manual.</u></p> <p>Subject to further clarification from IEMOP process owner during RCC meeting</p>	

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(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
SETTLEMENT	(new)	(new)	5 SECTION 5 SETTLEMENT	To align with Section 8 of ERC Resolution No. 08, Series of 2021	APC: Ensure consistency in item/section numbering.		Defer to RCC Secretariat on item/section numbering.	Adopt original urgent amendments and re-numbering
COVERAGE	(new)	(new)	5.1 COVERAGE <u>This section describes the procedures for the calculation of the gross energy settlement quantities of Renewable Energy Suppliers for use in WESM settlements.</u>	To align with Section 8 of ERC Resolution No. 08, Series of 2021	APC: Ensure consistency in item/section numbering.		Defer to RCC Secretariat on item/section numbering.	Adopt original urgent amendments and re-numbering
DETERMINATION OF SETTLEMENT QUANTITIES	(new)	(new)	5.2 DETERMINATION OF SETTLEMENT QUANTITIES	To align with Section 8 of ERC Resolution No. 08, Series of 2021	APC: Ensure consistency in item/section numbering.		Defer to RCC Secretariat on item/section numbering.	Adopt original urgent amendments and re-numbering

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			<p><u>5.2.1</u> <u>The metered quantity of each GEOP End-User connected to a grid off-take metering point shall be determined as the net metered flows at their respective metering installations associated with such grid off-take metering point.</u></p> <p><u>5.2.2</u> <u>The Central Registration Body shall determine the metered quantity of the GEOP End-Users at a grid off-take metering point using the metering data for each dispatch interval provided by the relevant GEOP Metering Services Provider and, if applicable, converted by the Central</u></p>					
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ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

			<p><u>Registration Body under the Retail Manual on Metering Standards and Procedures.</u></p> <p><u>5.2.3 The gross energy settlement quantity of a Renewable Energy Supplier shall be determined for each grid off-take metering point with which it has a GEOP End-User.</u></p> <p><u>5.2.4 The gross energy settlement quantity of each Renewable Energy Supplier for each grid off-take metering point shall be determined as the sum of the metered quantities of all GEOP End-Users associated with such grid off-take metering point.</u></p>					
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ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
USE OF SETTLEMENT QUANTITIES	(new)	(new)	<p>5.3 USE OF SETTLEMENT QUANTITIES</p> <p>5.3.1 The <i>Market Operator</i> shall use the <i>gross energy settlement quantities</i> of <i>Renewable Energy Suppliers</i> determined under Section 5.2.4 for <i>WESM</i> settlement.</p> <p>5.3.2 The settlement and billing of the transactions of <i>Renewable Energy Suppliers</i> in the <i>WESM</i> shall be performed by the <i>Market Operator</i> in accordance with the settlement process set out in Chapter 3 of the <i>WESM Rules</i>.</p>	To align with Section 8 of ERC Resolution No. 08, Series of 2021				Adopt original urgent amendments

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
SETTLEMENT OF GEOP END-USERS WITH THEIR RENEWABLE ENERGY SUPPLIERS	(new)	(new)	<p><u>5.4 SETTLEMENT OF GEOP END-USERS WITH THEIR RENEWABLE ENERGY SUPPLIERS</u></p> <p><u>Billing and settlement of the transactions of the <i>GEOP End-Users</i> with their respective <i>Renewable Energy Suppliers</i> shall be performed by the parties in accordance with their contracts and applicable rules and regulations promulgated by the <i>ERC</i> and other competent agencies.</u></p>	To align with Section 8 of ERC Resolution No. 08, Series of 2021	<p>MERALCO:</p> <p>Include a provision which will cover billing and settlement between NSP & RE Suppliers in case of Single Billing and NSP & GEOP End Users in case of Dual Billing.</p>		We deem that settlement between NSP and RE Suppliers is not part of the scope of the Retail Rules and Manuals.	Adopt original urgent amendments
PRUDENTIAL REQUIREMENTS	(new)	(new)	<p><u>5.5 PRUDENTIAL REQUIREMENTS</u></p>	To align with Section 8 of ERC Resolution No. 08, Series of 2021				Adopt urgent amendments

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
			<p><u>5.5.1</u> <u>Renewable Energy Suppliers shall comply with the prudential requirements as set out in Chapter 3 of the WESM Rules.</u></p> <p><u>5.5.2</u> <u>The amount of security that will be required of a Renewable Energy Supplier shall be determined based on the trading limit and maximum exposure determined in accordance with Chapter 3 of the WESM Rules.</u></p>					

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
SETTLEMENT INFORMATION	(new)	(new)	<p>5.6 SETTLEMENT INFORMATION</p> <p>5.6.1 Settlement information identifiable to Renewable Energy Suppliers shall be treated as confidential information by the Market Operator and the Central Registration Body and shall be subject to the provisions of Chapter 5 of the WESM Rules.</p>	To align with Section 8 of ERC Resolution No. 08, Series of 2021				Adopt urgent amendments

ANNEX A2 – Partial Matrix of Proposed New Retail Manual on GEOP Procedures

(NEW) Retail Manual on GEOP Procedures								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comment	Original Proponent's Response	RCC Decision (22 Apr 2022)
			<p>5.6.2 <u>Access to settlement information pertaining to <i>GEOP End-Users</i> shall be provided to their respective <i>Renewable Energy Supplier</i> counterparties, provided, however that those <i>GEOP End-Users</i> may be provided access to their own settlement information upon request from the <i>Central Registration Body</i>.</u></p>					

ANNEX A3 – Additional Changes to the Retail Rules

Retail Rules			
Title and Clause	Original Provision	Proposed Amendments	RCC Agreement (22 Apr 2022)
3.2.2 Procedures for Switching	<p>3.2.2.4 If the <i>Central Registration Body</i> verifies that the conditions set forth in Clauses 3.2.2.1, 3.2.2.2 and 3.2.2.3 are not met or if the <i>Market Operator</i> confirms that the prudential requirements are not fully satisfied:</p> <p>a) The <i>Central Registration Body</i> shall notify the <i>Supplier</i> which submitted the <i>switch request</i>, the incumbent <i>Supplier</i> and the relevant <i>Distribution Utility</i> or <i>Network Service Provider</i> that the <i>switch request</i> shall not take effect and the reasons therefore within the prescribed timeframe set forth in this <i>Retail Rules</i>.</p> <p>b) The <i>Supplier</i> which submitted the <i>switch request</i> may rectify the shortcomings in the previous <i>switch request</i> and submit the complete requirements to the <i>Central Registration Body</i> within the prescribed timeframe under Clause 3.2.2.1.</p> <p>xxx</p>	<p>3.2.2.4 If the <i>Central Registration Body</i> verifies that the conditions set forth in Clauses 3.2.2.1, 3.2.2.2 and 3.2.2.3 are not met or if the <i>Market Operator</i> confirms that the prudential requirements are not fully satisfied:</p> <p>a) <u>If the <i>Retail Customer</i> is a <i>Contestable Customer</i>, the <i>Central Registration Body</i> shall notify the <i>Supplier</i> which submitted the <i>switch request</i>, the incumbent <i>Supplier</i> and the relevant <i>Distribution Utility</i> or <i>Network Service Provider</i> that the <i>switch request</i> shall not take effect and the reasons therefore within the prescribed timeframe set forth in this <i>Retail Rules</i>.</u></p> <p><u>b) If the <i>Retail Customer</i> is a <i>GEOP End-User</i>, the <i>Central Registration Body</i> shall notify the <i>Renewable Energy Supplier</i> which submitted the <i>switch request</i>, the incumbent <i>Supplier</i>, the <i>GEOP End-User</i> and the relevant <i>Distribution Utility</i> or <i>Network Service Provider</i> that the <i>switch request</i> shall not take effect and the reasons therefore within the prescribed timeframe set forth in this <i>Retail Rules</i>.</u></p> <p><i>[renumber next bullets]</i></p> <p>b) c) The <i>Supplier</i> which submitted the <i>switch request</i> may rectify the shortcomings in the previous <i>switch request</i> and submit the complete requirements to the <i>Central Registration Body</i> within the prescribed timeframe under Clause 3.2.2.1.</p>	Adopted

ANNEX A3 – Additional Changes to the Retail Rules

Retail Rules			
Title and Clause	Original Provision	Proposed Amendments	RCC Agreement (22 Apr 2022)
		xxx	
3.2.2 Procedures for Switching	3.2.2.6 A <i>Distribution Utility</i> as <i>Retail Metering Service Provider</i> that has received a notification from the <i>Central Registration Body</i> in connection with Clause 3.2.2.5, particularly on the standard metering requirement, shall comply with the metering requirements and submit the necessary information to the <i>Central Registration Body</i> within fifteen (15) <i>working days</i> from the receipt of the notification. The <i>Central Registration Body</i> shall inform the new <i>Supplier</i> of the lacking customer information and the status of the submission of the <i>Distribution Utility</i> . Failure to submit may subject the <i>Distribution Utility</i> to appropriate sanctions. The <i>Supplier</i> shall submit updated switch effective date, if necessary, to the <i>Central Registration Body</i> if the original switch effective date will be affected by metering installation.	3.2.2.6 A <i>Distribution Utility</i> as <i>Retail Metering Service Provider</i> that has received a notification from the <i>Central Registration Body</i> in connection with Clause 3.2.2.5, particularly on the standard metering requirement, shall comply with the metering requirements and submit the necessary information to the <i>Central Registration Body</i> within fifteen (15) <i>working days</i> from the receipt of the notification <u>if the Retail Customer is a Contestable Customer and within five (5) working days from the receipt of the notification if the Retail Customer is a GEOP End-User.</u> The <i>Central Registration Body</i> shall inform the new <i>Supplier</i> of the lacking customer information and the status of the submission of the <i>Distribution Utility</i> . Failure to submit may subject the <i>Distribution Utility</i> to appropriate sanctions. The <i>Supplier</i> shall submit updated switch effective date, if necessary, to the <i>Central Registration Body</i> if the original switch effective date will be affected by metering installation	Adopted
3.2.3 Customer Relocation	3.2.3.1 A <i>Retail Customer</i> that wishes to relocate to a new service address within the same franchise area or in the franchise area of another <i>Distribution Utility</i> or <i>Network Service Provider</i> and wishes to continue to be served by its present <i>Supplier</i> shall send a prior request for relocation of service to the <i>Supplier</i> and the relevant <i>Distribution Utilities</i> or <i>Network Service Providers</i> .	3.2.3.1 A Retail <u>Contestable</u> <i>Customer</i> that wishes to relocate to a new service address within the same franchise area or in the franchise area of another <i>Distribution Utility</i> or <i>Network Service Provider</i> and wishes to continue to be served by its present <i>Supplier</i> shall send a prior request for relocation of service to the <i>Supplier</i> and the relevant <i>Distribution Utilities</i> or <i>Network Service Providers</i> .	Adopted

ANNEX A3 – Additional Changes to the Retail Rules

Retail Rules			
Title and Clause	Original Provision	Proposed Amendments	RCC Agreement (22 Apr 2022)
	3.2.3.2 If the <i>Supplier</i> agrees to continue to provide service, the parties shall notify the <i>Central Registration Body</i> of the relocation and shall effect the relocation in accordance with the requirements and procedures set by the relevant <i>Distribution Utilities</i> or <i>Network Service Providers</i>	3.2.3.2 If the <i>Supplier</i> agrees to continue to provide service to the <u>Contestable Customer</u> , the parties shall notify the <i>Central Registration Body</i> of the relocation and shall effect the relocation in accordance with the requirements and procedures set by the relevant <i>Distribution Utilities</i> or <i>Network Service Providers</i>	Adopted
3.2.3 Customer Relocation	[None; insertion]	<p><u>3.2.3.4 A GEOP End-User who intends to transfer to a new service address within the Distribution Utility or Network Service Provider’s franchise area and wishes to continue receiving service from its Renewable Energy Supplier shall send a request for relocation of service to its Renewable Energy Supplier, copy furnish the Central Registration Body, at least thirty (30) business days before the planned relocation date. The request for relocation of service shall contain the following:</u></p> <p><u>a) Address of the new location; and</u> <u>b) Intended date of transfer and the commencement of service at the new location.</u></p> <p><u>Prior to sending the request for relocation of service to its current Renewable Energy Supplier, the GEOP End-User should have performed due diligence in ensuring that the intended relocation site is within the Distribution Utility or Network Service Provider’s franchise area and distribution system.</u></p>	Adopted
3.2.3	[None; insertion]	<u>3.2.3.5 The Renewable Energy Supplier shall inform the GEOP End-User whether it shall continue or discontinue its</u>	Adopted

ANNEX A3 – Additional Changes to the Retail Rules

Retail Rules			
Title and Clause	Original Provision	Proposed Amendments	RCC Agreement (22 Apr 2022)
Customer Relocation		<u>service at the <i>GEOP End-User's</i> new location within one (1) working day from receipt of the Request for Relocation of Service. In case of discontinuance, the reason therefor shall be provided by the <i>Renewable Energy Supplier</i>. Likewise, within the same period provided herein, the <i>Renewable Energy Supplier</i> shall send a copy of the <i>GEOP End-User's</i> request for relocation of service, along with a notice to continue or discontinue the <i>Renewable Energy Supplier's</i> service to the Central Registration Body.</u>	
3.2.3 Customer Relocation	[None; insertion]	<p><u>3.2.3.6 If the <i>Renewable Energy Supplier</i> shall continue its service, the <i>Central Registration Body</i> shall forward the request for relocation of service to the <i>Distribution Utility</i> within one (1) working day from receipt of the notice from the <i>Renewable Energy Supplier</i>.</u></p> <p><u>The <i>Distribution Utility</i> shall send notice of approval or disapproval of such request to the <i>Renewable Energy Supplier</i> through the <i>Central Registration Body</i> within two (2) working days from receipt of the <i>Central Registration Body's</i> notice. In case of approval, the <i>Renewable Energy Supplier</i> shall enter into negotiations with the <i>Distribution Utility</i> and that they shall have a perfected Distribution Wheeling Services Agreement within three (3) working says from receipt of the notice of the approval.</u></p> <p><u>The <i>Distribution Utility</i> shall then send a notice to the <i>Central Registration Body</i> that the Distribution Wheeling Services Agreement has been perfected and the effective</u></p>	Adopted

ANNEX A3 – Additional Changes to the Retail Rules

Retail Rules			
Title and Clause	Original Provision	Proposed Amendments	RCC Agreement (22 Apr 2022)
		<u>date and time for the commencement of the service in the new location within two (2) working days from perfection of the Distribution Wheeling Services Agreement.</u>	
3.2.3 Customer Relocation	[None; insertion]	<u>3.2.3.7 The Central Registration Body shall forward the Distribution Utility's notice of perfection of the Distribution Wheeling Services Agreement to the Renewable Energy Supplier within one (1) working day from receipt of such notice and the Renewable Energy Supplier shall then forward the notice to its GEOP End-User within one (1) working day from receipt thereof.</u>	Adopted
3.2.3 Customer Relocation	[None; insertion]	<u>3.2.3.8 The <i>Distribution Utility</i> and <i>GEOP End-User</i> shall have a new connection agreement at the new location. The relocation date shall take into consideration the <i>Distribution Utility's</i> completion of connection facilities at the new location.</u>	Adopted
3.2.3 Customer Relocation	[None; insertion]	<u>3.2.3.9 A <i>GEOP End-User</i> who intends to transfer to a new service address in another franchise area and wishes to continue receiving service from its <i>Renewable Energy Supplier</i> shall be governed by the procedures for new applications as may be required by the relevant <i>Distribution Utility</i>.</u> <u>The <i>Renewable Energy Supplier</i> shall submit a new switch request in accordance with requirements and procedures set in Clause 3.2.2.</u>	Adopted

ANNEX A3 – Additional Changes to the Retail Rules

Retail Rules			
Title and Clause	Original Provision	Proposed Amendments	RCC Agreement (22 Apr 2022)
3.2.3 Customer Relocation	<p>3.2.3.4 If the <i>Supplier</i> does not agree to continue to provide service to a <i>Retail Customer</i> under the <i>Green Energy Option Program</i>, the <i>Retail Customer</i> shall have the following options:</p> <p>a) Switch to a new <i>Supplier</i> in accordance with the requirements and procedures set in Clause 3.2.2;</p> <p>b) If the <i>Retail Customer</i> fails to comply with the conditions set out in the previous paragraph, the <i>Retail Customer</i> may transfer to a <i>Supplier of Last Resort</i> in accordance with requirements and procedures set in Clause 3.4 or revert to being a Captive End-User in accordance with the requirements and procedures set in Clause 3.5.</p>	<p>3.2.3.43.2.3.10 If the <i>Supplier</i> does not agree to continue to provide service to a <i>Retail Customer</i> under the <i>Green Energy Option Program</i> <i>GEOP End-User</i>, the <i>Retail Customer</i> shall have the following options:</p> <p>a) Switch to a new <i>Supplier</i> in accordance with the requirements and procedures set in Clause 3.2.2;</p> <p>b) If the <i>Retail Customer</i> fails to comply with the conditions set out in the previous paragraph, the <i>Retail Customer</i> may transfer to a <i>Supplier of Last Resort</i> in accordance with requirements and procedures set in Clause 3.4 or revert to being a Captive End-User Customer in accordance with the requirements and procedures set in Clause 3.5.</p>	Adopted
3.2.3 Customer Relocation	<p>3.2.3.5 The conditions and procedures set out in this Clause 3.2.3 shall apply only when the <i>registered facility</i> of a <i>Contestable Customer</i> is transferred to different service address and the certification of contestability issued by the <i>ERC</i> remains valid; Provided, however that if a new certificate of contestability is issued by the <i>ERC</i> for the facility at its new location, this Clause 3.2.3 shall not apply.</p> <p>a) The <i>Contestable Customer</i> may apply for new registration in respect to said facility, which registration shall be governed by Chapter 2 of these <i>Retail Rules</i>; and</p>	<p>3.2.3.511 The conditions and procedures set out in this Clause 3.2.3 shall apply only when the <i>registered facility</i> of a <i>Contestable Retail Customer</i> is transferred to <i>transfers to a</i> different service address and the certification of contestability issued by the <i>ERC</i> <i>Network Service Provider confirms that the End-User's new system complies with the threshold demand requirements for retail competition or the Green Energy Option Program, as may be applicable.</i> remains valid;</p> <p>Provided, however that if a new certificate of contestability is issued by the <i>ERC</i> for the facility at its new location, this Clause 3.2.3 shall not apply.</p> <p>a) The <i>Contestable Customer</i> may apply for new registration in respect to said facility, which registration shall be governed by</p>	Adopted

ANNEX A3 – Additional Changes to the Retail Rules

Retail Rules			
Title and Clause	Original Provision	Proposed Amendments	RCC Agreement (22 Apr 2022)
	b) The <i>Central Registration Body</i> shall cease the registration of the previously-registered facility in accordance with Chapter 2 of the <i>Retail Rules</i> and relevant <i>Market manuals</i> .	Chapter 2 of these <i>Retail Rules</i>; and b) The <i>Central Registration Body</i> shall cease the registration of the previously-registered facility in accordance with Chapter 2 of the <i>Retail Rules</i> and relevant <i>Market manuals</i> .	
3.2.5 Termination of <i>Supplier</i> Service by the <i>Supplier</i>	3.2.5.1 If the <i>Supplier</i> does not intend to renew the supply contract of a <i>Retail Customer</i> , it shall send a notice of non-renewal to the <i>Retail Customer</i> and the <i>Central Registration Body</i> at least thirty (30) days prior to the expiration of the term of the contract.	3.2.5.1 If the <u>Retail Electricity Supplier</u> does not intend to renew the supply contract of a <i>Retail</i> <u>Contestable</u> <i>Customer</i> , it shall send a notice of non-renewal to the <i>Retail</i> <u>Contestable</u> <i>Customer</i> and the <i>Central Registration Body</i> at least thirty (30) days prior to the expiration of the term of the contract.	Adopted
3.2.5 Termination of <i>Supplier</i> Service by the <i>Supplier</i>	3.2.5.2 If the <i>Supplier</i> intends to terminate the contract prior to the expiration of its term, it shall send a notice of the termination to the <i>Retail Customer</i> in accordance with terms specified in their contract. Prior to the date of termination, the <i>Supplier</i> shall also send the notice to the <i>Central Registration Body</i> and to the relevant	3.2.5.2 If the <u>Retail Electricity Supplier</u> intends to terminate the contract prior to the expiration of its term, it shall send a notice of the termination to the <i>Retail</i> <u>Contestable</u> <i>Customer</i> in accordance with terms specified in their contract. Prior to the date of termination, the <i>Supplier</i> shall also send the notice to the <i>Central Registration Body</i> and to the relevant <i>Network Service Provider</i> and <i>Retail Metering Services Provider</i> .	Adopted
3.2.5 Termination of <i>Supplier</i> Service by the <i>Supplier</i>	[None; insertion]	<u>3.2.5.3 If the Renewable Energy Supplier does not intend to renew the GEOP Supply Contract upon its expiration, the Renewable Energy Supplier shall send a notice of non-renewal to the GEOP End-User and the Central Registration Body at least thirty (30) business days prior to the expiration of such contract. The Central Registration Body shall forward to the Network Service Provider the</u>	Adopted

ANNEX A3 – Additional Changes to the Retail Rules

Retail Rules			
Title and Clause	Original Provision	Proposed Amendments	RCC Agreement (22 Apr 2022)
		<u>notice of non-renewal within one (1) working day from receipt thereof.</u>	
3.2.5 Termination of <i>Supplier</i> Service by the <i>Supplier</i>	[None; insertion]	<u>3.2.5.4 If a <i>GEOP End-User</i> decides to terminate its <i>GEOP Supply Contract</i> with its <i>Renewable Energy Supplier</i> before the end of the term of the <i>GEOP Supply Contract</i>, the <i>GEOP End-User</i> shall inform the <i>Renewable Energy Supplier</i> and the latter shall process the termination of the <i>GEOP Supply Contract</i> in accordance with the termination clause of such contract. The <i>Renewable Energy Supplier</i> shall then submit a notice of termination to the <i>Central Registration Body</i> within one (1) working day from the effectivity of the pre-termination.</u>	Adopted
3.2.5 Termination of <i>Supplier</i> Service by the <i>Supplier</i>	[None; insertion]	<u>3.2.5.6 The <i>Central Registration Body</i> shall forward the notice to the <i>Network Service Provider</i> within one (1) working day from receipt of the notice of termination. The <i>Network Service Provider</i> and <i>Renewable Energy Supplier</i> or <i>GEOP End-User</i> shall act on the termination of the <i>wheeling services agreement</i> for that <i>GEOP End-User</i> within three (3) working days.</u> [renumber next clauses] xxx	Adopted subject to MERALCO's rewording on Sec. 3.2.5.6

ANNEX B1 – Partial Matrix of Proposed Amendments to the WESM Manual on System Security and Reliability for Implementation of Reserve Market

WESM Manual on System Security and Reliability								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
Normal State Operation	5.1	<p>The grid shall be operated so that it remains in the normal state, i.e.:</p> <p>(a) The operating margin is sufficient.</p> <p>(b) The grid frequency is within the limits as set forth in the Grid Code.</p> <p>(c) Voltages at all connection points are within the limits of 0.95 and 1.05 of the nominal value.</p> <p>(d) The loading levels of all transmission lines and transformers are below the limit as set forth in the Grid Code.</p> <p>(e) The grid configuration is such that any potential fault current can be interrupted and the faulted equipment can be isolated from the grid.</p> <p>(f) The static and dynamic stability of</p>	<p>Propose to revise as follows:</p> <p>“5.1 Normal State Operation</p> <p>The Grid shall be <u>considered to be in the Normal State when operated so that it remains in the normal state, i.e.:</u></p> <p>(a) The operating margin is sufficient. <u>The Single Outage Contingency (N-1) Criterion is met;</u></p> <p>(b) The grid frequency is within the limits as set forth in the Grid Code. <u>The Regulating, Contingency and Dispatchable Reserves are in accordance with the values established in the Ancillary Service Procurement Plan for these types of Reserves;</u></p> <p>(c) Voltages at all connection points are within the limits of 0.95 and 1.05</p>	<p>For consistency with PGC2016 provisions regarding normal state on GO 6.2.2.1.</p> <p>For consistency with PGC 2016 6.2.21 (b). Revised PR and SR to RR CR, and included DR, for consistency with DC2021-03-009.</p> <p>For consistency with PGC2016 PST 3.2.2 and GCR 6.2.2.1(c).</p>	<p>(36) MEI/PEI: MEI and PEI would like to clarify from the proponent if operational thermal limit capacity is the same as continuous rating. Operational thermal limit is defined in PGC 2016 as the maximum capacity of transmission facilities determined and declared by the System Operator and Transmission Network Provider which is submitted to GMC for validation annually. It is our understanding that the operational thermal limit capacity is the confidence level given by the Transmission Network Provider to a particular transmission facility based on operational</p>		(36) Yes. As declared, it is the same.	Deferred

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WESM Manual on System Security and Reliability								
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		<p>the power system is maintained.</p> <p>(g) The single outage contingency (N-1) criterion is met.</p>	<p>of the nominal value. <u>The Grid Frequency is within the +/- 0.3 Hz limits.</u></p> <p>(d) The loading levels of all transmission lines and transformers are below the limit as set forth in the Grid Code. <u>The voltages at all transmission substations are within 95% to 105% of the nominal voltage limits.</u></p> <p>(e) The grid configuration is such that any potential fault current can be interrupted and the faulted equipment can be isolated from the grid. <u>The loading levels of all transmission lines and substation equipment are below 90% of the operational thermal limit capacity of phase conductors and transformers as certified and submitted by the Transmission Network Provider; and</u></p>	<p>For consistency with PGC2016 PST 3.2.2 and GCR 6.2.2.1(d).</p> <p>In reference to PGC2016, GO 6.2.2.1 (e), originally 100% loading level, per PGC 2016.</p> <p>Proposed to be lowered to 90% to address conflicting interpretations in Alert State (Critical Loading = 90% to 100% loading).</p> <p>For consistency with PGC2016, GO 6.2.2.1 (f).</p>	<p>experience and practice, which is not necessarily equivalent to the designed continuous rating of the said facility.</p> <p>(37) IEMOP: Item (b) includes dispatchable reserves, however, PGC2016 clause 6.2.2.1 (b) only takes note of Primary and Secondary reserves, which we think are equivalent to Contingency and Regulating reserve. Please clarify the difference in this proposal.</p> <p>Also, if there is insufficient reserves scheduled to meet the requirement, then it means the different grids are</p>		<p>(37)</p> <p>On item (b), Normal conditions is not dependent on availability of reserves but on the Net Operating Margin, further suggest to revise 5.1(b): “The Net Operating Margin must be above the highest plant online.”</p> <p>On item (e), we would like to request for IEMOP's further elaboration of the query.</p>	

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			<p>(f) The static and dynamic stability of the power system is maintained. <u>The grid configuration is such that any potential fault current can be interrupted and the faulted equipment can be isolated from the grid.</u></p> <p>(g) The single outage contingency (N-1) criterion is met."</p>		<p>always not in Normal State?</p> <p>For item (e), there is no defined value for Operational Thermal Limit Capacity. It is only defined as <i>the maximum capacity of transmission facilities determined and declared by the System Operator and Transmission Network Provider which is submitted to GMC for validation annually.</i> We suggest instead to define Operational Thermal Limit Capacity, then state that it shall be based on Critical Loading.</p> <p>(38) MERALCO "Outage Contingency" is redundant with the definition of</p>	<p>(38) MERALCO xxx</p>	<p>(38) Suggest to retain "Outage" for consistency with the PGC 2016 Ed.</p>	

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WESM Manual on System Security and Reliability								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
					<p><i>Contingency. The outage of a single component of the grid that cannot be predicted in advance but which excludes scheduled maintenance. Thus, it is suggested to delete "Outage".</i></p> <p>TC: For item 5.1 (e)</p> <p>1. In GO6.2.2.1(e) lowering the loading level from 100% to 90% for normal state is like relaxing the performance requirement for NSP.</p> <p>In reference to PGC2016, GO 6.2.2.1 (e), originally 100% loading level, per PGC 2016. Proposed to be lowered to 90% to address conflicting interpretations in</p>	(a)The Single- Outage Contingency (N-1) Criterion is met; xxx		

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					Alert State (Critical Loading = 90% to 100% loading). 2. These may have implications on MI and LMP in WESM. Request for the MO's clarification on the impact of this proposed amendment in the WESM.			
Voltage and Reactive Power Control	5.6	(a) The grid voltages shall be operated at safe levels to reduce the vulnerability of the grid to transient instability, dynamic instability, and voltage instability problems. Reactive reserve margins shall be adequate to maintain minimum acceptable voltage limits under facility outage conditions. (b) The control of voltage shall be achieved by managing the reactive power supply in the grid.	Propose to revise as follows: "xxx (b) In normal state, the control of voltage shall be achieved by managing the reactive power supply in the grid. These include the operation of the following equipment: (i) Synchronous generating units; (ii) Synchronous condensers; (iii) Shunt capacitors;	For consistency with PGC2016 GO 6.7.1.1				<i>Resumed deliberation during 195th RCC Meeting</i> Approved

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		<p>These include the operation of the following equipment: (i) Synchronous generating units; (ii) Synchronous condensers; (iii) Shunt capacitors; (iv) Shunt reactors; (v) Static var compensators (SVCs); and (vi) On-load tap-changing transformers</p> <p>(c) Operation of static and dynamic reactive devices shall be coordinated such that static devices are switched in or out of service so that the maximum reactive reserves are maintained on generators, synchronous condensers and other dynamic reactive devices.</p> <p>(d) Reactive resources shall be dispersed and located electrically so that they can be applied effectively and quickly when contingencies occur. Sufficient reactive resources that are available</p>	<p>(iv) Shunt reactors; (v) Static var compensators (SVCs); and (vi) On-load tap-changing transformers</p> <p>xxx”</p>					

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		<p>and operable shall be ensured by the System Operator through its own facilities and by the procurement of reactive power support services.</p> <p>(e) As a last resort, especially during light load conditions, some transmission lines may be switched off to reduce the charging MVars (capacitive reactive power) in the system and to keep the voltages within allowable limits. Transmission lines may be removed from service only after studies indicate that system reliability will not be degraded below acceptable levels.</p> <p>(f) Necessary corrective actions, including load reduction, shall be taken to prevent voltage collapse when reactive resources are insufficient.</p>						

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		(g) All generating units with automatic voltage control equipment shall normally be operated in voltage control mode. When a generator's voltage regulator is out of service, field excitation shall be maintained at a level sufficient to maintain generator stability.						
Frequency Control	5.7	<p>(a) The grid frequency shall be controlled by the timely use of frequency regulating reserve, contingency reserve, and demand control such as automatic load dropping (ALD) and/or manual load dropping (MLD) during emergency conditions.</p> <p>(b) A generating unit providing regulating and/or contingency reserves may be operated either in an automatic frequency-sensitive mode (also known as free governor mode) with primary response or in an automatic generation control (AGC)</p>	<p>Propose to revise as:</p> <p>“(a) The grid frequency shall be controlled by the timely use of frequency regulating reserve during normal conditions, and timely use of contingency reserve, dispatchable reserve and demand control such as automatic load dropping (ALD) and/or manual load dropping (MLD) during alert or emergency conditions.</p> <p>(b) A generating unit providing regulating and/or contingency reserves may</p>	<p>For consistency with PGC2016 GO 6.2.3.5. PR, SR and TR were changed to CR, RR and DR, respectively, in view of the reserve categories used in DC2021-03-0009.</p> <p>For clarity.</p>	<p>(49) MEI/PEI: The provision of regulating and/or contingency reserves through either free governor mode or automatic generation control (AGC) mode is a carry-over mechanism from PGC 2011. However, Section 6.6.5.1 of PGC 2016 is clear that a generating unit providing primary reserve (contingency reserve) as an ancillary service shall operate in governor control</p>		(49) Due to the DOE Department Circulars, which provided for the use of Old Ancillary Service Categories.	Deferred

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		<p>mode with secondary response.</p> <p>(c) A generating unit providing primary response for frequency regulation as an ancillary service shall operate in an automatic frequency-sensitive mode (also known as free-governor mode) for automatic response of the unit's power output to changes in frequency. The speed-governing system of the generating unit shall have a maximum response time of five (5) seconds.</p> <p>(d) Secondary response shall be required from selected generating units providing ancillary services for frequency regulation. Frequency control using the secondary response of the generating units shall be accomplished through automatic generation control (AGC) or manual adjustment of generation with specific</p>	<p>be operated either in an automatic frequency-sensitive mode (also known as free governor mode) with as primary response or in an automatic generation control (AGC) mode with as secondary response.</p> <p>xxx</p> <p>(f) Governors shall not be blocked and shall not be operated with excessive deadbands. To provide an equitable and coordinated system response to generation-load imbalances, governor speed-droop shall be set at 5% or better.</p> <p>(g)xxx (h)xxx"</p>	<p>For consistency with PGC GCR 4.4.2.4.4.</p>	<p>mode. Similarly, Section 6.6.6.1 stipulates that a generating unit providing secondary reserve (regulating reserve) as an ancillary service shall operate in automatic generation control. MEI and PEI would like to know the rationale of retaining the PGC 2011 requirement when the apparent intention of the proposed amendments to the SSRG is to harmonize the provisions of the said document with PGC 2016.</p> <p>(50) SNAP: Current Speed Droop setting is at 3% for all types of AS. With the proposal of at least</p>	<p>(51) MERALCO (a) The grid frequency shall be controlled by the regulating reserve during normal conditions, and timely use of Contingency reserve, dispatchable reserve</p>	<p>(50) For Hydro 3% or better, based on the proposal 3% is covered, retesting is not needed.</p> <p>(51) On actual, even in normal state,</p>	

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		<p>dispatch instructions from the System Operator. The maximum response time for the change in the unit's power output shall be twenty-five (25) seconds and which shall be sustainable for at least thirty (30) minutes.</p> <p>(e) The generation company or power plant shall not override the free-governor mode or automatic generation control (AGC) mode of a generating unit which is providing primary or secondary response.</p> <p>(f) Governors shall not be blocked and shall not be operated with excessive deadbands. To provide an equitable and coordinated system response to generation-load imbalances, governor droop shall be set at 5%.</p> <p>(g) A generating unit providing contingency reserve as an ancillary</p>			<p>5%, does this mean a retesting for all gencos wanting to set their speed droop to 5%?</p> <p>(51) MERALCO The proposed revision in 5.7(a) implies that contingency and dispatchable reserves are only utilized to control the grid frequency only during alert or emergency conditions. Does the operation of contingency and dispatchable reserves only happen under alert state? If such is the case, then it is suggested to clarify further the provision.</p>	<p>and demand control shall be used during alert or emergency conditions.</p>	<p>contingency reserve is used. We further suggest to revise the proposal, based on current practice and in consistency with PGC GO 6.6.4.1:</p> <p>“(a) The grid frequency shall be controlled by the timely use of regulating reserve contingency reserve, dispatchable reserve and demand control.”</p>	

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		<p>service shall be synchronized with the grid at the start of every trading interval to be able to automatically respond to any sudden loss or significant reduction in generating capacity.</p> <p>(h) In case the system frequency momentarily rises to 62.4 Hz or falls to 57.6 Hz, all generating units shall remain in synchronism with the grid for at least five (5) seconds to allow the System Operator to undertake measures to correct the situation.</p>						
System Reserve Requirements	5.8	(a) Sufficient system reserves shall be available at all times to maintain acceptable system frequency, necessary to cope with any load variations and errors in load forecasting and to replace generating capacity lost due to forced outages of generation and transmission equipment.	<p>Propose to revise as follows:</p> <p>“(a) Sufficient system reserves shall be available at all times to maintain acceptable system frequency, necessary to cope with any load variations and errors in load forecasting and to replace generating capacity lost due</p>	For inclusion of DR, and consistency with the reserve categories used in DC2021-03-0009.	(52) MERALCO “Outage Contingency” is redundant with the definition of <i>Contingency</i> . The outage of a single component of the grid that cannot be predicted in advance but which excludes scheduled	(52) MERALCO (a) Sufficient system reserves shall be available at all times to maintain acceptable system frequency, necessary to cope with any load variations and errors in load forecasting and to replace generating capacity	(52) Same as above responses	Retain NGCP's proposal

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		<p>Adequate frequency regulating reserve and contingency reserve shall be available to stabilize the system and facilitate the restoration to the normal state following a multiple outage contingency.</p> <p>(b) The operating margin of the grid is sufficient if the available generating capacity in excess of the sum of the system demand plus losses is greater than the capacity of the highest synchronized generating unit within a specific period of time to cover loss of a generating unit or the power import from a single circuit interconnection whichever is higher.</p> <p>(c) The required system reserves for regulating and contingency shall be in accordance with the latest ERC approved ancillary service procurement plan.</p>	<p>to forced outages of generation and transmission equipment. Adequate frequency regulating reserve, and contingency reserve, and dispatchable reserve shall be available to stabilize the system and facilitate the restoration to the normal state following a multiple outage contingency.</p> <p>(b) The operating margin of the grid is sufficient if the available generating capacity in excess of the sum of the system demand plus losses is greater than the capacity of the highest synchronized generating unit within a specific period of time to cover loss of a generating unit or the power import from a single circuit interconnection whichever is higher.</p> <p>(c) The required system reserves for regulating, and contingency and dispatchable reserve shall</p>		<p><i>maintenance</i>. Thus, it is suggested to delete "Outage".</p>	<p>lost due to forced outages of generation and transmission equipment. Adequate regulating reserve, contingency reserve, and dispatchable reserve shall be available to stabilize the system and facilitate the restoration to the normal state following a multiple outage contingency.</p>		

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			be in accordance with the latest ERC approved ancillary service procurement plan.”					
Demand Control	5.9	<p>(a) If demand control due to generation deficiency needs to be implemented, the System Operator shall issue a red alert warning by 1600H, a day ahead. The red alert warning shall specify the amount, the period during which the demand reduction will be required and the reason of the generation deficiency.</p> <p>(b) The System Operator shall issue demand control imminent warning when a demand reduction is expected within the next thirty (30) minutes. The demand control imminent warning shall be effective for one (1) hour and shall be automatically cancelled if it is not re-issued by the System Operator.</p>	<p>Propose to revise as follows:</p> <p>“(a) If demand control due to generation deficiency needs to be implemented, the System Operator shall issue a red alert warning by 1600H, a day ahead. The red alert warning shall specify the amount, the period during which the demand reduction will be required and the reason of the generation deficiency.</p> <p>(b) The System Operator shall issue demand control imminent warning when a demand reduction is expected within the next thirty (30) minutes. The demand control imminent warning shall be effective for one (1) hour and shall be automatically cancelled if</p>	<p>For consistency with PGC2016 GO 6.6.8</p> <p>For consistency with PGC2016 GO 6.6.8.4</p>	<p>(53) PEMC: For clerical revision of letters (enumeration) to avoid inadvertent deletion of provisions.</p>	<p>(53) PEMC: (a) If demand control due to generation deficiency needs to be implemented, the System Operator shall issue a red alert warning by 1600H, a day ahead. The red alert warning shall specify the amount, the period during which the demand reduction will be required and the reason of the generation deficiency.</p> <p>(b) The System Operator shall issue demand control imminent warning when a demand reduction is expected within the next thirty (30) minutes. The demand control</p>	<p>(53) We would like to withdraw our proposal, to cover Grids where no electricity market exist and to be consistent with PGC SD8.2.2.5 which states that: In Grids where no electricity market exists, the Red Alert warning shall be issued by the System Operator by 1600H, a day ahead.</p>	<p>Adopted NGCP proposal, as amended:</p> <ul style="list-style-type: none"> • Approved to withdraw proposed changes to item (a) of this provision (retain current) • Approved revised item (e) <p>xxx (e) <u>In the event of a protracted shortage in generation and when a reduction in demand is envisioned by the System</u></p>

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		<p>(c) During demand control, the implementation of real time dispatch shall cease and the System Operator, in coordination with the Market Operator, shall declare market intervention.</p> <p>(d) The user shall provide the System Operator with the amount of demand reduction actually achieved after the implementation of demand control.</p> <p>(e) The user shall abide by the instruction of the System Operator with regard to the restoration of demand. The restoration of demand shall be achieved as soon as possible and the process of restoration shall begin within two (2) minutes after the instruction is given by the System Operator.</p> <p>(f) The demand control shall include the following: (i) Automatic load dropping; (ii) Manual load dropping;</p>	<p>it is not re-issued by the System Operator.</p> <p>(c) During demand control, the implementation of real time dispatch shall cease and the System Operator, in coordination with the Market Operator, shall declare market intervention.</p> <p>(d) The user shall provide the System Operator with the amount of demand reduction actually achieved after the implementation of demand control.</p> <p>(e) <u>In the event of a protracted shortage in generation and when a reduction in demand is envisioned by the System Operator to be prolonged, the System Operator shall notify the user of the expected duration.</u></p> <p>(f) The user shall abide by the instruction of the System Operator with</p>	<p>For consistency with PGC2016, GO 6.6.8.6</p> <p>Re-numbered due to addition of items (e) and (g).</p>		<p>imminent warning shall be effective for one (1) hour and shall be automatically cancelled if it is not re-issued by the System Operator.</p> <p>(c) During demand control, the implementation of real time dispatch shall cease and the System Operator, in coordination with the Market Operator, shall declare market intervention.</p> <p>(d) The user shall provide the System Operator with the amount of demand reduction actually achieved after the implementation of demand control.</p> <p>(e) The user shall abide by the instruction of the System Operator with</p>		<p><u>Operator to be prolonged, the System Operator shall notify the user of the expected duration, at least one (1) hour before the extension.</u></p>

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		(iii) Demand reduction on instruction by the System Operator; and (iv) Voluntary demand management.	<p>regard to the restoration of demand. The restoration of demand shall be achieved as soon as possible and the process of restoration shall begin within two (2) minutes after the instruction is given by the System Operator.</p> <p><u>(fg) Demand Control shall be implemented to reduce the Demand of the Grid when:</u></p> <p><u>(i) The System Operator has issued a Red Alert notice due to generation deficiency or when a Multiple Outage Contingency resulted in islanding operation;</u></p> <p><u>(ii) The System Operator has issued Demand Control Imminent Warning Notice due</u></p>			<p>regard to the restoration of demand. The restoration of demand shall be achieved as soon as possible and the process of restoration shall begin within two (2) minutes after the instruction is given by the System Operator.</p> <p><u>In the event of a protracted shortage in generation and when a reduction in demand is envisioned by the System Operator to be prolonged, the System Operator shall notify the user of the expected duration.</u></p> <p>(f) The demand control shall include the following: (i) Automatic load dropping; (ii) Manual load dropping;</p>		

ANNEX B1 – Partial Matrix of Proposed Amendments to the WESM Manual on System Security and Reliability for Implementation of Reserve Market

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Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
			<p><u>to generation deficiency; or</u> <u>(iii) There is an Imminent Overloading of a line or Equipment following the loss of a line, equipment or generating plant that poses threat to system Security.</u></p>			<p>(iii) Demand reduction on instruction by the System Operator; and (iv) Voluntary demand management. <u>The user shall abide by the instruction of the System Operator with regard to the restoration of demand. The restoration of demand shall be achieved as soon as possible and the process of restoration shall begin within two (2) minutes after the instruction is given by the System Operator.</u> <u>(g) Demand Control shall be implemented to reduce the Demand of the Grid when:</u> <u>(i) The System Operator has issued a Red Alert notice due</u></p>	<p>(54) Item (a), was already addressed in comment 53. For item (e), if notification will be issued 4 hours before, the basis will be less accurate. Possible notification is at least one (1) hour before extension, using latest DAP as basis for more accurate assessment. Since DAP is released hourly, better to have notification one (1) hour prior extension.</p>	
			<p>(h) The demand control shall include the following: (i) Automatic load dropping; (ii) Manual load dropping; (iii) Demand reduction on instruction by the System Operator; and (iv) Voluntary demand management.”</p>		<p>(54) MERALCO We would like to inquire on the rationale for removing the 1600H day-ahead notice. Sufficient advance information / warning is needed to efficiently implement the Interruptible Load Program under ERC Resolution No. 8, series of 2010 (and as later amended by succeeding resolutions). Thus, it is suggested to</p>			

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					<p>retain the day-ahead notice.</p> <p>In 5.9 (e), it is suggested that in case of extended shortage of generation, the System Operator must advise the users at least 4 hours before of the extension.</p>	<p><u>to generation deficiency or when a Multiple Outage Contingency resulted in islanding operation;</u></p> <p><u>(ii) The System Operator has issued Demand Control Imminent Warning Notice due to generation deficiency; or</u></p> <p><u>(iii) There is an Imminent Overloading of a line or Equipment following the loss of a line, equipment or generating plant that poses threat to system Security.</u></p>	<p><u>(e) In the event of a protracted shortage in generation and when a reduction in demand is envisioned by the System Operator to be prolonged, the System Operator shall notify the user of the expected duration, at least one (1) hour before the extension.</u></p>	

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						<p><u>(h) The demand control shall include the following:</u> <u>(i) Automatic load dropping;</u> <u>(ii) Manual load dropping;</u> <u>(iii) Demand reduction on instruction by the System Operator; and</u></p> <p>(54) MERALCO (a) If demand control due to generation deficiency needs to be implemented, the System Operator shall issue a red alert warning by 1600H, a day ahead. The red alert warning shall specify the amount, the period during which the demand reduction will be required and the reason of the generation deficiency.</p>		

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						xxx (e) In the event of a protracted shortage in generation and when a reduction in demand is envisioned by the System Operator to be prolonged, the System Operator shall notify the user of the expected duration <u>at least four (4) hours before the extension.</u>		
Automatic Load Dropping (ALD) and Manual Load Dropping (MLD)	5.10	(a) Adequate load shedding facilities initiated automatically by frequency conditions outside the normal operating frequency excursion band shall be available and in service to restore the frequency to normal following the loss of one (1) or more generating units or other significant contingency events. A load shedding program shall be implemented to drop the necessary amount of load to arrest frequency decay,	Proposed to revise as follows: <u>"(a) Automatic Load Dropping</u> <u>(i) The System Operator shall establish the level of Demand required for Under-Frequency Load Shedding (UFLS) and Under-Voltage Load Shedding (UVLS) in order to limit the</u>	For consistency with PGC2016 GO 6.6.9 (Automatic Load Dropping) and GO 6.6.10 (Manual Load Dropping)	(55) MERALCO We would like to seek clarification on how UVLS will be implemented. It should be noted that ALD is actuated to restore system frequency to acceptable levels when there are generation and/or transmission outages in the grid. Low voltage, on the other hand, is site-	(55) MERALCO (a)(i) The System Operator shall establish the level of Demand required for Under-Frequency Load Shedding (UFLS) and Under-Voltage Load Shedding (UVLS) in order to limit the consequences of significant incidents or a major loss of generation in the grid. The System Operator	(55) Suggest to retain for consistency with ALD provision in the PGC 2016 Ed.	Adopted NGCP proposal, as amended: <ul style="list-style-type: none"> Approved to retain NGCP's proposal for item (a)(i) Approved MERALCO's suggestion for item (a)(vii)

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		<p>minimize loss of load, and permit timely system restoration.</p> <p>(b) The level of demand required for ALD shall be established by the System Operator in order to limit the consequences of a major loss of generation in the grid. Appropriate technical studies shall be conducted by the system Operator to justify the targets and/or to refine them as necessary.</p> <p>(c) Loads that are subject to ALD shall be split into rotating discrete MW blocks. The number of blocks and the under frequency setting for each block shall be specified by the System Operator.</p> <p>(d) If an ALD has taken place, the affected users shall not reconnect their feeders without clearance from the System Operator. The System Operator shall issue the instructions to</p>	<p><u>consequences of significant incidents or a major loss of generation in the grid. The System Operator shall conduct the appropriate technical studies to justify the targets and/or to refine them as necessary.</u></p> <p><u>(ii) A UFLS program shall be planned and implemented in coordination with other UFLS programs, if any, within the Grid and, where appropriate, with neighboring grids. The UFLS program shall be coordinated with generation control and protection systems, Under-</u></p>		<p>specific and DU transformers have automatic voltage regulators.</p> <p>We would also like to seek clarification if low voltages requiring UVLS implementation will occur under N-0 or N-1 conditions. It should be noted that low voltage under N-0 condition should not result in load dropping. Thus, it is suggested to remove UVLS in the ALD classification.</p> <p>For 5.10(a)(vii), to allow the user to focus on restoration of affected loads, it is suggested that notification to the System Operator be done after the reconnection of the last affected load.</p>	<p>shall conduct the appropriate technical studies to justify the targets and/or to refine them as necessary.</p> <p>xxx</p> <p>(a)(vii) The user shall notify the System Operator of the actual demand that was disconnected by UFLS, or the demand that was restored in the case of reconnection, within five (5) minutes of the load dropping or after the reconnection</p>	<p>We agree with MERALCO's comment.</p>	

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		<p>reconnect once the frequency of the grid has recovered.</p> <p>(e) To ensure that a subsequent fall in frequency will be contained by the operation of ALD, additional manual load dropping (MLD) shall be implemented so that the loads that were dropped by ALD can be reconnected.</p> <p>(f) MLD shall be conducted by distributors, as directed by the System Operator, in response to an overall shortage of energy at a node or in a region specified in the network market model, or other network conditions as determined by the System Operator in accordance with the procedures established under the Grid Code and Distribution Code.</p> <p>(g) To prepare for a generation deficiency situation, a priority scheme</p>	<p><u>voltage and other load shedding programs, Load restoration programs, and transmission protection and control systems.</u></p> <p><u>(iii) The user shall prepare its UFLS program in consultation with the System Operator. The user demand that is subject to UFLS shall be split into rotating discrete MW blocks. The System Operator shall specify the number of blocks and the under frequency setting for each block.</u></p> <p><u>(iv) If the User does not implement a UFLS program, the Transmission</u></p>			<p>of the last affected load.</p>		

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		<p>for MLD based on equitable load allocation shall be established by distributors in consultation with the System Operator.</p> <p>(h) Immediately following the issuance by the System Operator of an instruction to implement MLD, distributors shall make arrangement that will enable it to disconnect its scheduled Customers.</p> <p>(i) MLD may also be initiated by the System Operator in response to any other circumstances which it reasonably considers necessitate such action under the Grid Code or Distribution Code or any other applicable regulatory instrument.</p> <p>(j) Customers affected by the MLD shall not be reconnected by distributors until instructed by the System Operator to do so.</p>	<p><u>Network Provider shall install the Under-Frequency Relay at the main feeder and the System Operator shall drop the total user demand as a single block, if the need arises.</u></p> <p><u>(v) To ensure that a subsequent fall in frequency will be contained by the operation of UFLS, additional Manual Load Dropping shall be implemented so that the loads that were dropped by UFLS can be reconnected.</u></p> <p><u>(vi) If a UFLS has taken place, the affected Users shall not reconnect their feeders without clearance from the System</u></p>					

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			<p><u>Operator. The System Operator shall issue the instruction to reconnect, once the frequency of the grid has recovered. Subject to available generation, the first circuit to trip shall be the first to be energized.</u></p> <p><u>(vii) The user shall notify the System Operator of the actual demand that was disconnected by UFLS, or the demand that was restored in the case of reconnection, within five (5) minutes of the load dropping or reconnection.</u></p> <p><u>(viii) A UVLS programs shall be</u></p>					

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			<p><u>planned and implemented in coordination with other UVLS programs in the grid and, where appropriate, with neighboring grids.</u></p> <p><u>(ix) All UVLS programs shall be coordinated with generation control and protection systems, UFLS programs, load restoration programs and transmission protection and control programs.</u></p> <p><u>(x) The user shall notify the System Operator of the actual demand that was disconnected by UVLS, or the demand that was restored in the</u></p>					

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			<p><u>case of reconnection, within five (5) minutes of the load dropping or reconnection.</u></p> <p><u>(b) Manual Load Dropping</u></p> <p><u>(i) The user shall make arrangement that will enable it to disconnect its customer immediately following the issuance by the System Operator of an instruction to implement MLD.</u></p> <p><u>(ii) Distribution Utilities shall, in consultation with the System Operator, establish a priority scheme for MLD based on equitable Load allocation.</u></p> <p><u>(iii) If the System Operator has</u></p>					

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			<p><u>determined that the MLD carried out by the user is not sufficient to contain the decline in grid frequency, the System Operator may disconnect the total demand of the user in an effort to preserve the integrity of the grid.</u></p> <p><u>(iv) If a user disconnected its customers upon the instruction of the System Operator, the user shall not reconnect the affected customers until instructed by the System Operator to do so.</u></p>					
			(a) Adequate load shedding facilities initiated automatically by frequency					

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			<p>conditions outside the normal operating frequency excursion band shall be available and in service to restore the frequency to normal following the loss of one (1) or more generating units or other significant contingency events. A load shedding program shall be implemented to drop the necessary amount of load to arrest frequency decay, minimize loss of load, and permit timely system restoration.</p> <p>(b) The level of demand required for ALD shall be established by the System Operator in order to limit the consequences of a major loss of generation in the grid. Appropriate technical studies shall be conducted by the system Operator to justify the targets and/or to refine them as necessary.</p> <p>(c) Loads that are subject to ALD shall be split into rotating discrete MW</p>					

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			<p>blocks. The number of blocks and the under frequency setting for each block shall be specified by the System Operator.</p> <p>(d) If an ALD has taken place, the affected users shall not reconnect their feeders without clearance from the System Operator. The System Operator shall issue the instructions to reconnect once the frequency of the grid has recovered.</p> <p>(e) To ensure that a subsequent fall in frequency will be contained by the operation of ALD, additional manual load dropping (MLD) shall be implemented so that the loads that were dropped by ALD can be reconnected.</p> <p>(f) MLD shall be conducted by distributors, as directed by the System Operator, in response to an overall shortage of energy at a</p>					

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			<p>node or in a region specified in the network market model, or other network conditions as determined by the System Operator in accordance with the procedures established under the Grid Code and Distribution Code.</p> <p>(g) To prepare for a generation deficiency situation, a priority scheme for MLD based on equitable load allocation shall be established by distributors in consultation with the System Operator.</p> <p>(h) Immediately following the issuance by the System Operator of an instruction to implement MLD, distributors shall make arrangement that will enable it to disconnect its scheduled Customers.</p> <p>(i) MLD may also be initiated by the System Operator in response to any other circumstances which</p>					

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			<p>it reasonably considers necessitate such action under the Grid Code or Distribution Code or any other applicable regulatory instrument.</p> <p>(j) Customers affected by the MLD shall not be reconnected by distributors until instructed by the System Operator to do so."</p>					
System Restoration	5.11	<p>(a) A coordinated system restoration plan shall be established, reviewed, updated if necessary, and simulated to verify comprehensiveness and feasibility.</p> <p>(b) Following a significant incident that makes it impossible to avoid island grid operation, the grid shall separate into several self-sufficient island grids, which shall be resynchronized to restore the grid to the normal state.</p> <p>(c) If a part of the grid is not connected to the rest of the</p>	<p>Propose to revise as follows:</p> <p>"(a) A coordinated system restoration plan shall be established, reviewed, updated if necessary, and simulated to verify comprehensiveness and feasibility.</p> <p>(b) Following a significant incident that makes it impossible to avoid islanding grid operation, the grid <u>System Operator</u> shall separate <u>the Grid</u> into several self-sufficient islands grids, which shall be</p>	<p>For consistency with PGC2016 GO 6.2.3.8</p> <p>For clarity and consistency with PGC GO 6.8.4.2</p> <p>For consistency with PGC2016</p>	<p>(56) MERALCO "Outage Contingency" is redundant with the definition of <i>Contingency</i>. The outage of a single component of the grid that cannot be predicted in advance but which excludes scheduled maintenance. Thus, it is suggested to delete "Outage".</p>	<p>(56) MERALCO (d) Adequate Contingency Reserve and Regulating Reserves shall be available to stabilize the power system and facilitate the restoration to the normal state following a Multiple Outage Contingency.</p>	<p>(56) Same with responses above</p>	<p>Adopted NGCP proposal</p>

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		<p>grid, but there is no blackout in that part of the grid, the resynchronization of that part to the grid shall be undertaken by the System Operator.</p> <p>(d) Sufficient black start and fast start capacity shall be available at strategic locations to facilitate the restoration of the grid to the normal state following a total system blackout. At least two (2) black start plants shall be available at each power restoration highway or sub-grid. Each black start generating unit shall be tested to verify that it can be started and operated without being connected to the system.</p> <p>(e) Emergency drills shall be conducted at least once a year to familiarize all personnel responsible for emergency and grid restoration activities with the emergency and restoration procedures. The</p>	<p>resynchronized to restore the grid to the normal state.</p> <p>(c) If a part of the grid is not connected to the rest of the grid, but there is no blackout in that part of the grid, the System Operator shall undertake the resynchronization of that part to the grid shall be undertaken by the System Operator.</p> <p><u>(d) Adequate Contingency Reserve and Regulating Reserves shall be available to stabilize the power system and facilitate the restoration to the normal state following a Multiple Outage Contingency.</u></p> <p>(e) Sufficient black start and fast start capacity shall be available at strategic locations to facilitate the restoration of the grid to the normal state following a total system blackout. At least two (2) black start</p>	<p>GO 6.2.3.7 and DC2021-03-009.</p> <p>Re-numbering</p> <p>For consistency with PGC2016 GO 6.8.3.2</p> <p>For consistency with PGC2016 GO 6.8.3.4</p>				

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		drills shall simulate realistic emergency situations. A drill evaluation shall be performed and deficiencies in procedures and responses shall be identified and corrected.	<p>plants shall be available at each power restoration highway or sub-grid. Each black start generating unit shall be tested to verify that it can be started and operated without being connected to the system.</p> <p><u>(f) The System Operator shall issue instructions for the generating plants with Black Start Capability to initiate the Start-Up. The generation company providing Black Start shall then inform the System Operator that its generating plants are dispatchable within 30 minutes for the restoration of the Grid.</u></p> <p><u>(g) The overall strategy in the restoration of the Grid after a Total System Blackout shall, in general, include the following:</u></p> <p><u>(i) Overlapping phases of Blackout restoration of islands;</u></p>	<p>For consistency with PGC2016 GO 6.8.3.6</p> <p>Re-numbering</p>				

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			<p><u>(ii) Step-by-step integration of the Islands into larger subsystems; and</u> <u>(iii) Eventual restoration of the Grid.</u></p> <p><u>(h) The System Operator shall inform the Users of the Grid, after completing the Black Start procedure and the restoration of the Grid, that the Blackout no longer exists and that the Grid is back to the Normal State.</u></p> <p>(ej) Emergency drills shall be conducted at least once a year to familiarize all personnel responsible for emergency and grid restoration activities with the emergency and restoration procedures. The drills shall simulate realistic emergency situations. A drill evaluation shall be performed and deficiencies in</p>					

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			procedures and responses shall be identified and corrected.					
Grid Protection Requirements	5.12	(a) Grid protection shall be designed, coordinated, tested and maintained to achieve the desired level of speed, sensitivity, and selectivity in fault clearing and to minimize the impact of faults on the grid.	Propose to revise as: “(a) Grid protection shall be designed, wired, set and coordinated such that operation will not occur for external faults or non-fault conditions , tested and maintained to achieve the desired level of speed, sensitivity, and selectivity in fault clearing and to minimize the impact of faults on the grid.”	For consistency with PGC2016 GPR 7.2.3				Adopted
		(b) The grid shall have adequate and coordinated primary (Main 1 and Main 2) and local and remote backup protection at all times to limit the magnitude of grid disturbances when a fault or equipment failure occurs. Preferably, the Main 1 and Main 2 protection should be of different types (e.g. distance relay for Main 1 and current differential relay	Propose to revise as: “(b) The grid shall have adequate and coordinated primary (Main 1 and Main 2) and local and remote backup protection at all times to limit the magnitude of grid disturbances when a fault or equipment failure occurs. Preferably, the Main 1 and Main 2 protection should be of different types (e.g. distance relay for Main 1 and current differential relay for Main 2) and use	For clarity and consistency with PGC2016 GPR 7.2.4				Adopted

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		for Main 2) and use different teleprotection media (e.g. power line carrier or optical fiber for Main 1 and microwave for Main 2).	different teleprotection media (e.g. power line carrier or optical fiber for Main 1 and microwave for Main 2). <u>Redundant protection systems shall be installed in identified critical transmission lines. The two main line protection systems must preferably utilize different schemes and communication media.</u>					
		(d) Circuit breaker fail protection shall be designed to initiate the tripping of all the necessary electrically adjacent circuit breakers and to interrupt the fault current within the next fifty (50) milliseconds, in the event that the primary protection system fails to interrupt the fault current within the prescribed fault clearance time.	Propose to revise as: “(d) Circuit breaker failure protection system shall be designed to initiate the tripping of all the necessary electrically adjacent circuit breakers and to interrupt the fault current within the next fifty (50) milliseconds, in the event that after the primary protection system fails to interrupt clear the fault current within the prescribed fault clearance time.”	For consistency with PGC2016 GPR 7.3.3.2.1.				Adopted

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		<p>(i) Following a credible N-1 contingency where the Rules for a minimum grid performance are compromised, a temporary security measure such as the system integrity protection scheme (SIPS) shall be employed to avoid subsistence and spreading of the disturbance. The temporary employment of SIPS shall be coordinated with the concerned users and shall only be applied specific to parts of the system determined to be exposed to a high degree of likelihood for a secondary contingency (N-1-1) or a subsequent multiple contingency (N-x) such that the risk of cascaded blackout is avoided.</p> <p>Information on all available SIPS shall be provided to the Grid Management Committee and at the same time, it shall be coordinated with the concerned users.</p>	<p>Propose to revise as:</p> <p>“(i) Following a credible N-1 contingency where the Rules for a minimum grid performance are compromised, a temporary security measure such as the system integrity protection scheme (SIPS) shall be employed to avoid subsistence and spreading of the disturbance. The temporary employment of SIPS shall be coordinated with the concerned users and shall only be applied specific to parts of the system determined to be exposed to a high degree of likelihood for a secondary contingency (N-1-1) or a subsequent multiple contingency (N-x) such that the risk of cascaded blackout is avoided.</p> <p>Information on all available SIPS shall be provided to the Grid Management Committee and at the same time, it shall be coordinated</p>	<p>For consistency with PGC2016 GPR 7.7.1 and GPR 7.7.5.</p>	<p>(57) MERALCO It should be noted that SIPS should only be a temporary solution for portions of the grid which are non-compliant to the N-1 Contingency Criterion. Thus, it is suggested to retain the first paragraph in original provision.</p> <p>In addition, “Outage Contingency” is redundant with the definition of <i>Contingency: The outage of a single component of the grid that cannot be predicted in advance but which excludes scheduled maintenance.</i> Thus, it is suggested to delete “Outage”.</p>	<p>(57) MERALCO <u>(i) Following a credible N-1 contingency where the Rules for a minimum grid performance are compromised, a temporary security measure such as the system integrity protection scheme (SIPS) shall be employed to avoid subsistence and spreading of the disturbance.</u></p> <p>SIPS shall be installed to preserve the integrity of the Grid or strategic portions thereof lacking Single Outage Contingency (N-1) security, determined to be exposed to a high degree of probability of a secondary Contingency (N-1-1), and subsequent Multiple Outage</p>	<p>(57) We suggest to retain our proposal for consistency with the PGC 2016 Ed. provisions.</p>	<p>Adopted NGCP proposal</p>

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			<p>with the concerned users <u>SIPS shall be installed to preserve the integrity of the Grid or strategic portions thereof lacking Single Outage Contingency (N-1) security, determined to be exposed to a high degree of probability of a secondary Contingency (N-1-1), and subsequent Multiple Outage Contingency (N-k) during abnormal system conditions such as instability, thermal overloading, and voltage collapse. The prescribed action automatically performed by the schemes to protect system integrity may require the opening of one or more lines, tripping of generators, intentional shedding of Loads, or other mitigation measures that will alleviate the problem.</u></p>			<p>Contingency (N-k) during abnormal system conditions such as instability, thermal overloading, and voltage collapse. The prescribed action automatically performed by the schemes to protect system integrity may require the opening of one or more lines, tripping of generators, intentional shedding of Loads, or other mitigation measures that will alleviate the problem.</p> <p>The <u>temporary employment application</u> of SIPS shall be coordinated with the concerned Users of the Grid and shall only be <u>applied</u> specific to parts of the system determined to be exposed to a high degree of likelihood for a secondary</p>		

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			<u>The application of SIPS shall be coordinated with the concerned Users of the Grid and shall only be specific to parts of the system determined to be exposed to a high degree of likelihood for a secondary Contingency (N-1-1) or a subsequent multiple Contingency (N-k) such that the risk of cascaded blackout is avoided.</u>			contingency (N-1-1) or a subsequent multiple contingency (N-x) such that the risk of cascaded blackout is avoided.		
Telecommunications Requirements	5.13	Xxx (c) Separate telecommunication channels shall be provided for SCADA, automatic generation control (AGC), protective relaying, special protection systems, voice and data where appropriate. xxx	Propose to revise as: “(c) Separate telecommunication channels shall be provided for SCADA, automatic generation control (AGC) , protective relaying, special protection systems, voice and data where appropriate.”	AGC doesn't require a separate telecom channel to operate. It sends AGC setpoint commands to the generating units and receives feedback signals using the SCADA channel or DAC network.				Adopted

ANNEX B1 – Partial Matrix of Proposed Amendments to the WESM Manual on System Security and Reliability for Implementation of Reserve Market

WESM Manual on System Security and Reliability								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
Responsibilities	Section 6	The System Operator shall: (a) Make the necessary manual interventions upon existence of an imminent threat in system security or a credible N-1 contingency to restore back, without delay, the grid operating condition to normal state;						
		(b) Initiate, upon the existence of a credible N-1 contingency, any or a combination of manual corrective interventions as follows: (i) Switch off, or re-route, energy delivery from a Generation Company; (ii) Call equipment into service; (iii) Take transmission line or equipment out of service; (iv) Commence operation of generating units or maintain, increase or reduce active or reactive power output of the same; (v) Increase, reduce output of generating units or shut down or otherwise vary	Propose to revise as: “(b) <u>In case a credible N-1 Contingency occurs in the system and where no temporary System Integrity Protection Scheme (SIPS) are employed to avoid spreading of the disturbance, initiate, upon the existence of a credible N-1 contingency, any or a combination of manual corrective interventions as follows below, following a credible N-k Contingency in anticipation of a probable secondary outage, in order to stabilize the system:</u>	For consistency with PGC2016 GO 6.2.3.3				Adopted

ANNEX B1 – Partial Matrix of Proposed Amendments to the WESM Manual on System Security and Reliability for Implementation of Reserve Market

WESM Manual on System Security and Reliability								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
		operation of the same; and shed or restore load;	<p><u>(i) Generating Unit re-Dispatching</u> Switch-off, or re-route, energy delivery from a Generation Company;</p> <p><u>(ii) Usage of Voltage and/or power flow control on regulation Transformers</u> Call equipment into service;</p> <p><u>(iii) Network re-configuration</u> Take transmission line or equipment out of service;</p> <p><u>(iv) Manual Load Dropping (MLD)</u> Commence operation of generating units or maintain, increase or reduce active or reactive power output of the same;</p> <p><u>or</u></p> <p><u>(v) Generating Unit Tripping</u> Increase, reduce output of generating units or shut down or otherwise vary operation of the same; and shed or restore load”</p>					
		(d) Constrain-on / constrain-off or make use of MRUs whenever all available	Propose to revise as: “(d) Constrain-on / constrain-off generators	To clarify the use of WMOT for constrain-				Adopted

ANNEX B1 – Partial Matrix of Proposed Amendments to the WESM Manual on System Security and Reliability for Implementation of Reserve Market

WESM Manual on System Security and Reliability								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
		ancillary reserves are depleted or exhausted;	using the WESM Merit Order Table (WMOT) or make use of MRUs re-dispatched out-of-merit whenever all available ancillary reserves are depleted or exhausted;”	on/ constrain-off (based on Dispatch Protocol Issue 16.0 Section 10.6.1) while MRUs are dispatched out-of-merit (based on Dispatch Protocol Issue 16.0 Section 11.6.5)				
		(f) Propose a uniform required deadband applicable to all generators; and	Propose to revise as: “Propose a uniform required deadband applicable to all generators units providing Contingency Reserve as an Ancillary Service ; and”	For consistency with PGC 2016 GCR 4.4.2.4.2 and DC2021-03-009.	(58) SNAP: To align with the proposed revisions for 5.7 (b)	(58) SNAP: "Propose a uniform required deadband applicable to all generating units providing Regulating and/or Contingency Reserves in free governor mode as primary response. "	(58) We would like to suggest to further revise our proposal to read as: "(f) Propose a uniform required deadband applicable to all generators providing ancillary services; and"	Deferred
		(g) Issue necessary alert notices upon existence of qualifying threat.	Propose to revise as: “(g) Issue necessary alert notices upon existence of qualifying threat; and ”	For clarity				Adopted
		NEW	Propose to add:	For consistency with PGC				Adopted

ANNEX B1 – Partial Matrix of Proposed Amendments to the WESM Manual on System Security and Reliability for Implementation of Reserve Market

WESM Manual on System Security and Reliability								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
			<u>“(I) Maintain the Frequency Response Obligation (FRO) as indicated in the Philippine Grid Code, intended to be the minimum frequency response for preserving the reliability of the Grid.”</u>	2016, GO 6.6.3				

ANNEX B2 – Matrix of Proposed Amendments to the WESM Rules for Implementation of Reserve Market

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement
Glossary	Chapter 11	AGC. Automatic Generation Control	Propose to revise as follows: “AGC. Automatic Generation Control (AGC). It is an equipment that automatically adjusts the generation to maintain its generation dispatch, interchange schedule plus its share of frequency regulation. AGC is a combination of secondary control for a control area /control block and real-time operation of the generation dispatch function (based on generation scheduling). Secondary control is operated by the System Operator while generation scheduling is operated by the respective generation companies.”	For consistency with the definition in the PGC 2016 Edition.	(59) IEMOP: Same comment as in the first section where we proposed to just refer it to the PGC.		(59) Same with above responses	Adopted
		Dispatchable Reserve. Generating capacity that is not scheduled for regular energy supply, regulating reserve, contingency reserve, or interruptible loads not scheduled for contingency reserve, and that are readily available for dispatch in order to replenish the contingency reserve service whenever a generating unit trips or a loss of	Propose to revise as: “Dispatchable Reserve. Generating capacity that is not scheduled for regular energy supply, regulating reserve, contingency reserve, or interruptible loads not scheduled for contingency reserve, and that are readily available for dispatch in order to replenish the contingency reserve service whenever a generating unit trips or a loss of a	For consistency with the definition of Dispatchable Reserve in DC2021-03-0009.	(60) PEMC: Revises the definition of “Dispatchable Reserve” which is also the subject of PEM Board Resolution No. 2021-34-09 dated 31 March 2021 and 2021-		(60) Noted.	Deferred

ANNEX B2 – Matrix of Proposed Amendments to the WESM Rules for Implementation of Reserve Market

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement
		a single transmission interconnection occurs.	single transmission interconnection occurs.”		<p>41-04 dated 27 October 2021 (Urgent and General Amendments regarding Enhancements to the Market Operator and System Operator Procedures)</p> <p>(61) IEMOP: IEMOP already proposed the same revision on this definition in its submission of proposed amendments last September 2021</p> <p>(62) SPC: Verbatim definition of Dispatchable Reserve in DC2021-03-0009</p>	<p>(62) SPC: Propose to revise as: “Dispatchable Reserve. Generating capacity that is not scheduled for regular energy supply, regulating reserve,</p>	<p>(61) Noted.</p> <p>(62) Already addressed above.</p>	

ANNEX B2 – Matrix of Proposed Amendments to the WESM Rules for Implementation of Reserve Market

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement
						contingency reserve, or interruptible loads not scheduled for contingency reserve, and that are readily available for dispatch in order to replenish the contingency reserves service whenever a generating unit trips or a loss of a single transmission interconnection occurs.”		
		Normal State. The grid operating condition when: (a) The operating margin is sufficient; (b) System frequency is within the limits as set in the <i>Grid Code</i> ; (c) Voltages at all connection points are within the limits of 0.95 and 1.05 of the nominal value; (d) The loading levels of all transmission lines and transformers are below the limit as set in the <i>Grid Code</i> ; (e) The grid configuration is such that any potential fault	Propose to revise as: “Normal State. The grid operating condition when <u>the power system frequency, voltage, and transmission line and equipment loading are within their normal operating limits, the Operating Margin is sufficient, and the grid configuration is such that any fault current can be interrupted and the faulted equipment isolated from the Grid.</u> (a) The operating margin is sufficient; (b) System frequency is within the limits as set in the <i>Grid Code</i>;	For consistency with the definition of normal state in PGC 2016.	(63) IEMOP: Same comment as in the first section where we proposed to just refer it to the PGC. (64) MERALCO Minor typographical error	(64) MERALCO Normal State. The grid operating condition when wherein the power	(63) Same as above responses (64) Our proposed definition is how it was defined in the PGC 2016 Ed. We refer the	Adopted NGCP's proposal

ANNEX B2 – Matrix of Proposed Amendments to the WESM Rules for Implementation of Reserve Market

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement
		current can be interrupted and the faulted equipment can be isolated from the grid; (f) The static and dynamic stability of the power system is maintained; and (g) The Single Outage Contingency (N-1) Criterion is met.”	(c) Voltages at all connection points are within the limits of 0.95 and 1.05 of the nominal value; (d) The loading levels of all transmission lines and transformers are below the limit as set in the Grid Code; (e) The grid configuration is such that any potential fault current can be interrupted and the faulted equipment can be isolated from the grid; (f) The static and dynamic stability of the power system is maintained; and (g) The Single Outage Contingency (N-1) Criterion is met”			system frequency, voltage, and transmission line and equipment loading are within their normal operating limits, the Operating Margin is sufficient, and the grid configuration is such that any fault current can be interrupted and the faulted equipment isolated from the Grid.	decision to the RCC.	
		Reliability. The probability of a system, device, plant or equipment performing its function adequately for the period of time intended, under the operating conditions encountered.	Propose to revise as: “Reliability. <u>The performance of the elements of the bulk electric system that results in electricity being delivered to customers within accepted standards and in the amount desired. Reliability may be measured by the frequency, duration, and magnitude of adverse effects on the electric supply.</u> The probability of a system, device, plant or equipment performing its	For consistency with the definition of Reliability in PGC 2016.	(65) IEMOP: Same comment as in the first section where we proposed to just refer it to the PGC. TC: We suggest to retain the current definition with		(65) Same with responses above	Adopted

ANNEX B2 – Matrix of Proposed Amendments to the WESM Rules for Implementation of Reserve Market

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement
			function adequately for the period of time intended, under the operating conditions encountered.”		revision as follows: Reliability. The probability ability of a system, device, plant or equipment performing its function adequately for the period of time intended, under the operating conditions encountered. <i>Reference: IEEE Standard Computer Dictionary</i>			

ANNEX B3 – Matrix of Proposed Amendments to the WESM Manual on Dispatch Protocol

WESM Manual on Dispatch Protocol								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
Definitions, References and Interpretation	Section 2	Automatic Generation Control (AGC). The regulation of the power output of generating units within a prescribed area in response to a change in system frequency, tie-line loading, or the relation of these to each other, so as to maintain the system frequency or the established interchange with other areas within the predetermined limits or both.	Propose to revise as follows: “Automatic Generation Control (AGC). <u>It is an equipment that automatically adjusts the generation to maintain its generation dispatch, interchange schedule plus its share of frequency regulation. AGC is a combination of secondary control for a control area /control block and real-time operation of the generation dispatch function (based on generation scheduling). Secondary Control is operated by the System Operator while generation scheduling is operated by the respective Generation Companies.</u> The regulation of the power output of generating units within a prescribed area in response to a change in system frequency, tie-line loading, or the relation of these to each other, so as to maintain the system frequency or the established interchange with other areas within the predetermined limits or both.”	For consistency with the definition in the PGC 2016 Edition.	(66) IEMOP: Same comment as in the first section where we proposed to just refer it to the PGC.		(66) Same with responses above	Adopted

ANNEX B3 – Matrix of Proposed Amendments to the WESM Manual on Dispatch Protocol

WESM Manual on Dispatch Protocol								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
		Demand Control. The reduction in demand for the control of <i>frequency</i> when the <i>grid</i> is in an <i>emergency state</i> . This includes <i>automatic load dropping, manual load dropping, demand reduction upon instruction by the System Operator, demand disconnection initiated by users, customer demand management, and voluntary load curtailment.</i>	Propose to revise as: “Demand Control. The reduction in demand for the control of the Frequency when the grid is in an emergency State. This includes automatic load dropping, manual load dropping, demand reduction upon instruction by the System Operator, demand disconnection initiated by users, customer demand management, and voluntary load curtailment. and voluntary demand management. ”	For consistency with the definition in PGC 2016.	(67) IEMOP: Same comment as in the first section where we proposed to just refer it to the PGC. (68) MERALCO We would like to seek clarification if Demand Control also covers non-frequency constraints, such as transmission and equipment overloading.		(67) Same with responses above (68) Same with responses above	Adopted
		NEW	Propose to add: “ <u>Islanding Operation. The isolated operation of certain portions of the grid as a result of forced outages or contingency action by the System Operator.</u> ”	For reference in the use of “islanding operation” in Table 9 under Section 17.3 and Section 19.1.4 (a).	(69) IEMOP: Same comment as in the first section where we proposed to just refer it to the PGC. (70) SPC: During Grid Islanding Operation (i.e. Bohol Islanding), we suggest that NGCP's ASPA will not be	(70) SPC: <u>Islanding Operation. The isolated operation of certain portions of the grid as a</u>	(69) Same with responses above (70) Same with responses above	Approved NGCP's version SPC's proposed revision – may be placed in other DP provisions

ANNEX B3 – Matrix of Proposed Amendments to the WESM Manual on Dispatch Protocol

WESM Manual on Dispatch Protocol								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
					<p>cancelled/suspended since the Grid Islanding Operation still needs Ancillary Services for its system reliability. Likewise, the Reserve Market should not be cancelled during Grid Islanding Operation.</p> <p>(71) MERALCO For clarity, it is suggested to cite specific “forced outages” envisioned in the context of the proposed definition</p> <p>TC: See relevant comments from SSRG</p>	<p>result of forced outages or contingency action by the System Operator. <u>Although on islanding operation, the NGCP's ASPA and Reserve Market will continue to be operational since Grid Islanding Operation still needs Ancillary Services for its system reliability.</u></p>	(71) Same with responses above	
		Multiple Outage Contingency. An event caused by the failure of two (2) or more components of the grid including generating	Propose to revise as follows: Multiple Outage Contingency. An event caused by the failure of two (2) or more components of the	For consistency with the definition in PGC 2016.	(72) IEMOP: Same comment as in the first section where we proposed		(72) Same with responses above	Approved

ANNEX B3 – Matrix of Proposed Amendments to the WESM Manual on Dispatch Protocol

WESM Manual on Dispatch Protocol								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
		units, transmission lines, and transformers.	grid including generating units, transmission lines, and transformers.		to just refer it to the PGC. (73) MERALCO For clarification - Is the intention here to define Multiple Outage or the ability to handle the failure of two (2) or more components of the grid?		(73) Proposed definition is based on the definition in PGC 2016 Ed.	
		NEW	Propose to add the following: <u>“Normal State. The grid operating condition when the power system frequency, voltage, and transmission line and equipment loading are within their normal operating limits, the Operating Margin is sufficient, and the grid configuration is such that any fault current can be interrupted and the faulted equipment isolated from the Grid.”</u>	For reference in its use in Sections 7.7.1, 11.5.3, 12.1.3, 12.4.1(c), and Table A of Section 16.13.2.	(74) IEMOP: Same comment as in the first section where we proposed to just refer it to the PGC. TC: This is repetitious and redundant.		(74) Same as above responses	Approved
		Security. The ability of the electric system to withstand sudden disturbances such as electric short circuits or	Proposed to revise as follows: <u>“Security. The continuous operation of a power system in</u>	For consistency with the definition	(75) IEMOP: Same comment as in the first section where we proposed		(75) Same as above responses	Approved NGCP's proposal

ANNEX B3 – Matrix of Proposed Amendments to the WESM Manual on Dispatch Protocol

WESM Manual on Dispatch Protocol								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
		unanticipated loss of system elements.	<u>the normal state, ensuring safe and adequate supply of power to end-users, even when some parts or components of the system are on outage</u> The ability of the electric system to withstand sudden disturbances such as electric short circuits or unanticipated loss of system elements.	used in PGC 2016 Edition.	to just refer it to the PGC. (76) MERALCO Inserting the word “some” introduces qualification in the definition. It is suggested to delete “some” since the definition can still stand without it. We would also like to seek clarification if the proposed definition excludes the impact of transient disturbances, such as overvoltage. TC: See relevant comments from SSRG	(76) MERALCO Security. The continuous operation of a power system in the normal state, ensuring safe and adequate supply of power to end-users, even when some parts or components of the system are on outage.	(76) Same as above responses	Mr. Rosales in response to MERALCO: transient disturbances is addressed in this definition for “Security”.
		System Integrity Protection Scheme (SIPS). A protection system that is designed to detect abnormal or predetermined system conditions, and take automatic corrective	Revise as follows: “System Integrity Protection Scheme (SIPS). A protection system that is designed to detect abnormal or predetermined system conditions, and take	For consistency with the definition under the PGC 2016.	(77) IEMOP: Same comment as in the first section where we proposed to just refer it to the PGC.		(77) Same as above responses	Approved NGCP's proposal Mr. Rosales: in the PGC, SIPS is

ANNEX B3 – Matrix of Proposed Amendments to the WESM Manual on Dispatch Protocol

WESM Manual on Dispatch Protocol								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
		actions.	automatic corrective actions <u>other than and/or in addition to the isolation of faulted components in order to preserve the integrity of the power system or strategic portions thereof.</u>		(78) MERALCO As provided in ERC Resolution No. 16, Series of 2015 entitled "A Resolution Adopting the Grid Management Committee's Proposed Amendments to Annex "A" of ERC Resolution No. 21, Series of 2014", in case an element/s of the existing network lacks N-1 security, a temporary measure, such as SIPS, should be made available for the time being that a permanent network improvement is still pending. Thus, if SIPS is needed to protect the system for N-1 conditions, it should be temporary only.	(78) MERALCO System Integrity Protection Scheme (SIPS). A protection system that is designed to detect abnormal parameters or predetermined system conditions, and take automatic corrective actions other than and/or in addition to the isolation of faulted components in order to preserve the integrity of the power system or strategic portions thereof. <u>It shall only be used on a temporary basis to address N-1 conditions.</u>	(78) Same as above responses	already described as a stop-gap or temporary measure

ANNEX B3 – Matrix of Proposed Amendments to the WESM Manual on Dispatch Protocol

WESM Manual on Dispatch Protocol								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	NGCP-SO's Response	RCC Agreement (22 Apr 2022)
					It is also suggested to add "parameters" for clarity.			

ANNEX C – List of Unregistered Loads and Status of Registration

Status of the Registration Applications of the Unregistered Loads

UNREGISTERED LOAD	CURRENT DIRECT MEMBER COUNTERPARTY	START OF WESM TRANSACTIONS	DATE APPLICATION SUBMITTED	PENDING REQUIREMENTS	ACTIONS TAKEN BY IEMOP
Pantabangan Municipal Electric Services <i>(Applying as Indirect WESM Member – Customer TP)</i>	First Gen Hydro Power Corporation	26 June 2006	4 June 2012	<ul style="list-style-type: none"> • Market Participation Agreement (updating of PEMC signatory) • Articles of Incorporation (AOI) • SEC Certificate of Registration (SEC Cert) • Secretary's Certificate (Sec Cert) • Certificate of Franchise • Transmission Service Agreement (TSA) • Metering Service Agreement (MSA) • Counterparty Form • Metering Info 	<ol style="list-style-type: none"> 1. Meetings Conducted <ul style="list-style-type: none"> • 10/29/2020 • 4/6/2021 2. Letters Transmitted <ul style="list-style-type: none"> • 8/11/2020 3. Several communications through email, phone calls and text messages



ANNEX C – List of Unregistered Loads and Status of Registration

UNREGISTERED LOAD	CURRENT DIRECT MEMBER COUNTERPARTY	START OF WESM TRANSACTIONS	DATE APPLICATION SUBMITTED	PENDING REQUIREMENTS	ACTIONS TAKEN BY IEMOP
NIA UPRIIS <i>(Applying as Indirect WESM Member – Customer TP)</i>	First Gen Hydro Power Corporation	26 June 2006	11 June 2021	<ul style="list-style-type: none"> • DCC Cert • Metering Info 	<ol style="list-style-type: none"> 1. Meetings Conducted <ul style="list-style-type: none"> • 10/29/2020 • 3/16/2021 2. Letters Transmitted <ul style="list-style-type: none"> • 5/27/2021 3. Several communications through email, phone calls and text messages
Altima Empire Steel Corporation	San Miguel Energy Corporation	26 October 2016	20 November 2020	<ul style="list-style-type: none"> • Metering Info (from MSP) 	<ol style="list-style-type: none"> 1. Meetings Conducted <ul style="list-style-type: none"> • 10/28/2020 • 4/14/2021 2. Letters Transmitted <ul style="list-style-type: none"> • 8/11/2020 • 5/27/2021 3. Several communications through email, phone calls and text messages

ANNEX C – List of Unregistered Loads and Status of Registration

UNREGISTERED LOAD	CURRENT DIRECT MEMBER COUNTERPARTY	START OF WESM TRANSACTIONS	DATE APPLICATION SUBMITTED	PENDING REQUIREMENTS	ACTIONS TAKEN BY IEMOP
Centerra Ice Plant & Cold Storage, Inc. <i>(Applying as Indirect WESM Member – Customer TP)</i>	San Miguel Energy Corporation	26 February 2012	4 June 2012	<ul style="list-style-type: none"> • Metering Info (from MSP) • Market Participation Agreement (updating of PEMC signatory) • Secretary's Certificate (for updating) 	<ol style="list-style-type: none"> 1. Meetings Conducted <ul style="list-style-type: none"> • 10/28/2020 2. Letters Transmitted <ul style="list-style-type: none"> • 8/11/2020 • 5/27/2021 3. Several communications through email, phone calls and text messages
Kabayan Ice Plant <i>(Applying as Indirect WESM Member – Customer TP)</i>	San Miguel Energy Corporation	26 December 2007	4 June 2012	<ul style="list-style-type: none"> • Metering Info (from MSP) • Market Participation Agreement (updating of PEMC signatory) • Secretary's Certificate (for updating) 	<ol style="list-style-type: none"> 1. Meetings Conducted <ul style="list-style-type: none"> • 10/28/2020 2. Letters Transmitted <ul style="list-style-type: none"> • 8/11/2020 • 5/27/2021 3. Several communications through email, phone calls and text messages

ANNEX C – List of Unregistered Loads and Status of Registration

UNREGISTERED LOAD	CURRENT DIRECT MEMBER COUNTERPARTY	START OF WESM TRANSACTIONS	DATE APPLICATION SUBMITTED	PENDING REQUIREMENTS	ACTIONS TAKEN BY IEMOP
Pampanga III Electric Cooperative, Inc. <i>(Applying as Direct WESM Member – Customer TP)</i>	San Miguel Energy Corporation	26 June 2006	4 April 2016	Prudential Requirement (PR)	<ol style="list-style-type: none"> 1. Meetings Conducted <ul style="list-style-type: none"> • 4/14/2021 2. Several communications through email, phone calls and text messages
Grand Planters International, Inc. <i>(Applying as Indirect WESM Member – Customer TP)</i>	San Miguel Energy Corporation	26 June 2006	6 July 2012	<ul style="list-style-type: none"> • Market Participation Agreement (updating of PEMC signatory) • Secretary's Certificate (for updating) • DCC Cert • Metering Info 	<ol style="list-style-type: none"> 1. Meetings Conducted <ul style="list-style-type: none"> • 10/28/2020 2. Letters Transmitted <ul style="list-style-type: none"> • 8/11/2020 • 5/27/2021 3. Several communications through email, phone calls and text messages

ANNEX C – List of Unregistered Loads and Status of Registration

UNREGISTERED LOAD	CURRENT DIRECT MEMBER COUNTERPARTY	START OF WESM TRANSACTIONS	DATE APPLICATION SUBMITTED	PENDING REQUIREMENTS	ACTIONS TAKEN BY IEMOP
RJS Commodities <i>(Applying as Indirect WESM Member – Customer TP)</i>	San Miguel Energy Corporation	26 December 2010	5 February 2021	<ul style="list-style-type: none"> • Contact Info • Metering Info • Market Participation Agreement (updating of PEMC signatory) • Secretary's Certificate (for updating) 	<ol style="list-style-type: none"> 1. Meetings Conducted <ul style="list-style-type: none"> • 10/28/2020 • 4/14/2021 2. Letters Transmitted <ul style="list-style-type: none"> • 8/11/2020 • 5/27/2021 3. Several communications through email, phone calls and text messages
Real Steel Corporation <i>(Applying as Indirect WESM Member – Customer TP)</i>	San Miguel Energy Corporation	26 March 2013	26 November 2020	Metering Info (from MSP)	<ol style="list-style-type: none"> 1. Meetings Conducted <ul style="list-style-type: none"> • 10/28/2020 • 4/14/2021 2. Letters Transmitted <ul style="list-style-type: none"> • 8/11/2020 • 5/27/2021 3. Several communications through email, phone calls and text messages

ANNEX C – List of Unregistered Loads and Status of Registration

UNREGISTERED LOAD	CURRENT DIRECT MEMBER COUNTERPARTY	START OF WESM TRANSACTIONS	DATE APPLICATION SUBMITTED	PENDING REQUIREMENTS	ACTIONS TAKEN BY IEMOP
National Irrigation Administration – NIA Region 2 <i>(Applying as Direct WESM Member – Customer TP)</i>	Settled by National Irrigation Administration – NIA Region 2		8 June 2020	<ul style="list-style-type: none"> • MPA • By-laws • Transmission Service Agreement • Metering Service Agreement • Settlement Info Sheet • Proof of PR • Projected Quantities • DCC Cert • Contact Info • Metering Info 	<ol style="list-style-type: none"> 1. Meetings Conducted <ul style="list-style-type: none"> • 11/20/2020 • 4/15/2021 2. Letters Transmitted <ul style="list-style-type: none"> • 11/3/2020 • 5/27/2021 • 5/10/2021 3. Several communications through email, phone calls and text messages
National Irrigation Administration – NIA MARIIS <i>(Applying as Direct WESM Member - Customer TP)</i>	Settled by National Irrigation Administration – NIA MARIIS			<ul style="list-style-type: none"> • MPA • By-laws • Secretary's Certificate • Transmission Service Agreement • Metering Service Agreement • Settlement Info Sheet • Proof of PR • Projected Quantities • DCC Cert • Contact Info • Metering Info 	<ol style="list-style-type: none"> 1. Meetings Conducted <ul style="list-style-type: none"> • 11/20/2020 2. Letters Transmitted <ul style="list-style-type: none"> • 11/3/2020 • 5/27/2021 • 6/11/2021 3. Several communications through email, phone calls and text messages