

MEETING MINUTES

Subject/Purpose : 210th Rules Change Committee (Special) Meeting
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ATTENDEES

No.	Name	Designation/Position	Department/ Company
1	Jesusito G. Morillos	Chairman, Independent	RCC
2	Jose Roderick F. Fernando	Member, Independent	RCC
3	Jordan Rel C. Orillaza	Member, Independent	RCC
4	Dixie Anthony R. Banzon	Member, Generation Sector	RCC
5	Cherry A. Javier	Member, Generation Sector	RCC
6	Carlito C. Claudio	Member, Generation Sector	RCC
7	Jessie B. Victorio	Member (Alternate), Generation Sector	RCC
8	Mark D. Habana	Member, Generation Sector	RCC
9	Ryan S. Morales	Member, Distribution Sector	RCC
10	Nelson M. Dela Cruz	Member, Distribution Sector	RCC
11	Getulio Z. Crodua	Member (Alternate), Distribution Sector	RCC
12	Rocky D. Bayas	Member, Distribution Sector	RCC
13	Lorreto H. Rivera	Member, Supply Sector	RCC
14	Dennis R. Paragas	Member (Alternate), Supply Sector	RCC
15	Henry V. Dela Cruz	Member (Alternate), System Operator	RCC
16	John Paul S. Grayda	Member, Market Operator	RCC
17	Kristoffer S. Ng	Member (Alternate), Market Operator	RCC
18	Karen A. Varquez	RCC Secretariat	PEMC
19	Divine Gayle C. Cruz	RCC Secretariat	PEMC
20	Dianne L. De Guzman	RCC Secretariat	PEMC
21	Bienvenido C. Mendoza, Jr.	MAG Head	PEMC
22	Armie Eloisa V. Exporna	MAG	PEMC
23	Andrea J. Mendiola	Legal Head	PEMC
24	Ervin John Mikel D. Hilado	Legal Counsel	PEMC
25	Christin Paula E. Delgado	Executive Assistant, OCGO	PEMC
26	Melanie C. Papa	Observer	DOE
27	Jhannelyn D. Marasigan	Observer	DOE
28	Marvin Jay A. Masanda	Observer	DOE
29	Sheryll M. Dy	Proponent	IEMOP
30	Karen Anne H. Siruma	Proponent	IEMOP
31	Lilibeth Grace L. Vetus	Proponent	IEMOP
32	Edward I. Olmedo	Proponent	IEMOP
33	Jenny I. Jalandoni	Proponent	IEMOP
34	Lex Magtalas	Observer	APC

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I. Call to Order	<ul style="list-style-type: none"> The meeting was conducted via Microsoft Teams and was called to order at 9:02 AM. The meeting was presided by Mr. Jesusito G. Morallos (Chairperson/Independent).
II. Determination of Quorum	There were 12 principal members and 5 alternate members present during the meeting.
III. Adoption of Agenda	The provisional agenda was approved, as submitted.
IV. New Business	
<p>Proposed Urgent Amendments to the WESM Rules and Various WESM Manuals on the Implementation of the Interruptible Load Program (ILP)</p>	<p><u>Presenters:</u> Ms. Dianne L. De Guzman (Secretariat) Ms. Karen Anne H. Siruma (IEMOP)</p> <p><u>Action Requested:</u> For deliberation/approval</p> <p><u>Material/s:</u> Annex A – Presentation Material Annex B – Proposal Matrix</p> <p><u>Proceedings:</u></p> <ul style="list-style-type: none"> The RCC considered in its discussion the proponent's presentation of the summary of the proposal, the matrix of proposed amendments, the Secretariat's preliminary assessment and Ms. Rachel Angela P. Anosan's (Independent) initial comments submitted prior the meeting. Ms. Siruma (IEMOP) provided the following overview: <ul style="list-style-type: none"> The proposal was prompted by the DOE's directive to the Market Operator in December 2022 to incorporate in the relevant WESM Rules and Manuals the implementation of the ILP primarily based on the existing Interim Protocol for the Declaration of Bilateral Contract Quantity (BCQ) during the Implementation of Interruptible Load Program, as well as to recommend improvements. The proposal was submitted as urgent for immediate effectivity during the forthcoming summer months. ILP is a mechanism wherein participating Customers (e.g., Contestable Customers, Captive Customers, Directly

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	<p>Connected Customers) either fully or partially de-load voluntarily as a response to the alert or notice issued by the System Operator (SO) of an expected power shortage. De-loading helps reduce demand and thus relieves anticipated tight supply during the relevant dispatch interval.</p> <p>An ILP Administrator and Participating Customer enter an ILP Agreement. When the SO issues an alert for expected power shortage, both entities activate their ILP Protocol. Pursuant to existing rules and the Interim ILP Protocol, the Generation Company concerned shall re-declare BCQ in the WESM due to the activation of ILP. The ILP Administrator thereafter compensates the ILP Participant following successful de-loading in accordance with the formula provided in ERC Resolution No. 5, Series of 2015.</p> <ul style="list-style-type: none"> ○ The proposed amendments intend to: <ol style="list-style-type: none"> 1) Clarify timelines for submitting day-ahead information by Generation Companies to assist the SO in issuing accurate and timely declaration of alert notices which is the basis of ILP activation; 2) Require Network Service Providers (NSPs) and Directly Connected Customers to inform the MO of significant change in demand due to ILP implementation so the MO will be able to account the ILP-related de-loaded capacity in the forecasted demand during real-time scheduling; 3) Incorporate relevant procedures from the Interim ILP Protocols to the WESM Manual on Billing and Settlement to institutionalize the procedures that are not already in the said Manual; 4) Include 'force majeure' as additional grounds for BCQ redeclaration to accommodate Trading Participants' request for redeclaration process (e.g., due to CRSS unavailability) ○ During ILP implementation, the metered quantity of the Contestable Customer (CC) that de-loaded will decrease, which will in turn adjust the gross energy settlement quantity of that CC's Retail Electricity Supplier (RES). Per the Interim ILP Protocol, the Generation Company counterparty of the RES must re-declare to the MO the adjusted BCQ for the ILP CC participant for the account of the DU.

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	<p>Re-declaration must be done within seven (7) days from the end of the relevant trading day when the ILP is activated. The BCQ re-declaration process is more straightforward if the ILP participant is a DCC since the Generation Company shall just re-declare BCQ for that DCC.</p> <ul style="list-style-type: none"> ○ NSPs are required to submit to the MO the list of ILP participants within its franchise area every 15th day of the month. In addition, if ILP is activated, NSPs shall inform the MO of the time and actual capacity de-loaded one (1) working day after occurrence of ILP activation. The Generation Company shall then re-declare BCQ within seven (7) days from the trading day when ILP was activated. Depending on when the BCQ is re-declared, the following scenario may occur: <ul style="list-style-type: none"> i. if re-declaration was submitted within the prescribed 7-day period and prior the 29th day of the month, it will be considered in the MO's issuance of preliminary settlement statement, and then in the final settlement statement; ii. if the re-declaration was submitted within the prescribed 7-day period but fell on or after the 29th day of the month, it will not be considered in the preliminary settlement statement but only in the final settlement statement; and iii. if the re-declaration was submitted beyond the prescribed 7-day period, it will no longer be considered both in the preliminary and final settlement statements. ● The RCC unanimously certified the proposal as urgent, having satisfied two criteria for urgent proposed amendments per WESM Rules Clause 8.4.1.1(a)(i) and (a)(iv): <ul style="list-style-type: none"> <i>(a) Urgent Proposals refer to proposals for amendments to the WESM Rules and Market Manuals or the adoption of new Market Manuals, which require immediate action to-</i> <ul style="list-style-type: none"> <i>(i) To avoid, reduce the risk of or mitigate the adverse effects of certain conditions on the ability of the power system to function normally; xxx</i> <i>(iv) Facilitate the implementation of any regulation, circular, order or issuance of the DOE or ERC pursuant to the EPIRA. xxx</i>

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	<p>The RCC also considered that IEMOP submitted the proposal as urgent to comply with the DOE's directive in December 2022 to submit proposed amendments to mitigate supply concerns for the forthcoming summer months.</p> <p>Mr. Olmedo additionally explained that the proposed amendments to provisions relative to Trading Participants' submissions accounted during day-ahead projections falls under criterion (a) in order to address inaccurate day-ahead information regarding the availability of generators.</p> <ul style="list-style-type: none"> • Having certified the proposal as urgent, the RCC proceeded to deliberate, the highlights of which are as follows: <ul style="list-style-type: none"> ○ Mr. Morales (RCC-DU, MERALCO) inquired how exactly will the proposal improve the implementation of ILP. Ms. Siruma responded that the proposal would help make day-ahead projections (DAP) more accurate by requiring generators to submit day-ahead information, which are input to the DAP, that are as accurate as possible. The DAP serves as the SO's reference in determining the need to issue alert notices. Additionally, the proposal also clarifies the timeline for the MO's process for running the DAP to guide Trading Participants in submitting their day-ahead information. This likewise affects the MO's processing of real-time projections. ○ On the matter of settlement of ILP Participants, Ms. Siruma clarified that this is done outside the WESM settlement process in accordance with the relevant ERC Resolution that provides a formula for determining compensation based on the capacity de-loaded by the ILP Participant. Depending on whether the ILP Participant is a DU-connected or grid-connected customer, either the DU or NGCP (i.e., NSPs) shall serve as the ILP Administrator who is responsible for allocating among all end-users the cost for compensating the ILP Participant. ○ Mr. Orillaza (RCC-Independent) commented that it would be better if PEMC and IEMOP would instead look into activating and advancing the implementation of demand-side bidding (DSB) to address supply shortage during the

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	<p>summer months instead of ILP. Provisions for DSB already exist in the WESM Rules while ILP is a mechanism outside the market. Mr. Olmedo (Proponent, IEMOP) responded that the idea of DSB has been floated years ago but there is still no general policy developed to implement it.</p> <ul style="list-style-type: none"> ○ Ms. Javier (RCC-Generation, APC) commented that the proposed new timeline for Trading Participants to submit their updated nominations, bids and offers for Week-Ahead Projections or WAP (i.e., from 0845H to 0800H) does not seem to have relevance with ILP which is the subject of the proposal. Mr. Orillaza agreed and suggested to have a separate proposal regarding the WAP timeline considering that it is an operational issue and is not necessarily related to ILP. <p>Mr. Olmedo explained that ILP is triggered when tight supply is forecasted for the next day. This emphasizes the importance of accurate Day-Ahead Projections ran hourly, which is a reference used by the SO whether to issue alert notices or not that then determines if activating ILP is necessary. Further, the timeline for submitting information for the WAP is likewise proposed to be amended to ensure accuracy of the WAP. It was observed that the commitment of data (i.e., market offers for next 7 days) required for the WAP run has been slowing down, hence the need for the MO to have more lead time of 45 mins for data processing prior running the WAP at 0900H. Moreover, although the accuracy of market projections is not monitored in the MO Performance Standards (only the publication of the market projection results), the MO maintains internal standards on their accuracy. Nevertheless, it should be noted that the quality of projections depends on the accuracy of inputs (e.g., supply capacity, grid condition) submitted by external entities such as Market Participants and the System Operator. More importantly than the change in timeline, the proposed amendments aim to compel participants to submit to the MO their offers and nominations that best represent their plants' capabilities for the next 7 days (for the WAP).</p> <ul style="list-style-type: none"> ○ On the proposed new provisions obliging NSPs to submit to the MO the committed capacity to be de-loaded due to ILP, Mr. Morales expressed that NSPs may be unable to comply since the information would come from the Customers and



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	<p>cannot be determined immediately nor accurately. In addition, it may not be fair for the NSPs/DUs if they will be subject to strict compliance considering that ILP is only a service that NSPs/DUs may offer to help in the supply during peak periods when the demand is high.</p> <p>Mr. Olmedo explained that currently, the information is just verbally communicated to the MO so these can be considered in the forecasting. He clarified that the NSPs' submission of the committed ILP capacity will not be in real-time but shall be submitted in a timeline ahead of real-time scheduling that would be amenable for the NSPs. Mr. Olmedo clarified that the main objective is for the MO to be apprised ahead of time of the capacity committed for de-loading to be considered during real-time scheduling.</p> <ul style="list-style-type: none"> ○ Pertaining to the process for re-declaring BCQ arising from ILP activation, Ms. Rivera commented that it may be necessary to revise the relevant Retail Manuals as well to provide procedures and guidelines for it. She explained that although the Generation Company is responsible for re-declaring BCQ to the MO, it is still the RES who will trigger the Generation Company to re-declare and confirm it in turn. The settlement of RES may also be affected by ILP because the objective of the re-declaration is to re-allocate (de-loaded) quantities from the RES to the DU. Moreover, the Generation Company is not privy to the arrangement or transaction between the RES and the Contestable Customers who, together with the NSP/DU, are the primary entities involved with ILP. But since IEMOP is proposing to include ILP in the WESM, then the transaction procedures should also be accounted for in the rules. <ul style="list-style-type: none"> ● From the discussions and with inputs from the RCC Secretariat's preliminary assessment of the proposal, the RCC agreed on the following changes to the proposal and likewise handed further instructions to PEMC, IEMOP and concerned RCC representatives: <ul style="list-style-type: none"> ○ WESM Rules <ul style="list-style-type: none"> ▪ IEMOP to add a high-level or overarching provision within the WESM Rules to introduce the concept of

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	<p>Interruptible Load Program, rather than merely defining the term in the Glossary as proposed.</p> <ul style="list-style-type: none"> ▪ Clerical revisions in the proposed definition. <p>○ For the Dispatch Protocol Manual (DPM):</p> <ul style="list-style-type: none"> ▪ Retain current timeline for Trading Participants' (TP) submission of their most updated self-scheduled nomination, bids or offers for the WAP and DAP market runs instead of the proposal to make the submissions earlier. The MO is amenable to this as long as Sections 6.1.7 and 6.13 of the DPM are invoked in the relevant portions of the WAP and DAP timetables in Sections 4.3.2 and 4.4.2, respectively, to emphasize the TPs' obligation to submit accurate and most updated information. ▪ Revise Section 9.3.4 to clarify that NSPs' provision to the MO of committed MW capacity to be de-loaded for ILP is not in real-time, which NSPs would be unable to comply. <p>○ For Load Forecasting Manual:</p> <p>Review Sections 4.4.3 and 7.3 and its sub-sections, which prescribes the obligation of NSPs to provide information to the MO on the MW capacity committed for the ILP, to ensure clarity in the timeline for compliance (i.e., not real-time).</p> <p>○ For Billing and Settlement Manual:</p> <ol style="list-style-type: none"> i. Revise Section 9.5.1 to include in the process for declaring BCQs the RES transactions with Contestable Customers. ii. The RCC requested IEMOP to provide examples on the process of BCQ redeclaration with values to clearly illustrate the flow of transactions and financial impact of ILP. iii. Proposed new Sections 9.5.2 to 9.5.4 to be transferred to the Registration Manual or Dispatch Protocol Manual, as appropriate, as these refer to registration and pre/post-dispatch procedures.

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	<p>iv. Referring to Section 9.5.2 requiring the DU and System Operator to provide the MO with the list of their customers participating in ILP, IEMOP to check if there will be any violations to the Data Privacy and Confidentiality.</p> <p>v. Considered IEMOP's re-wording for Section 9.5.8 to clearly state the MO's authority to approve or disapprove a request for BCQ redeclaration, as well as the recourse of a TP by way of the WESM dispute resolution process if the MO decides to disapprove a request.</p> <p>vi. Corrected the timeline stated in Section 9.5.10 pertaining to the accounting BCQ re-declaration relative to the preliminary and final settlement statement (i.e., 29th calendar month instead of 29th of billing month).</p> <p>o Adopt clerical revisions.</p> <p><u>Agreement:</u></p> <p>The RCC agreed with the MO's request to continue the deliberations in the next scheduled regular meeting on March 17 to allow further revisions to the proposal. The body also agreed that the concerned sector representatives may provide proposed revisions themselves in some provisions most relevant to them.</p>
V. Other Matters	
5.2 Schedule of Activities	<p><u>Presenter:</u> Ms. Divine Gayle C. Cruz (Secretariat)</p> <p><u>Action Requested:</u> For information</p> <p><u>Proceedings:</u></p> <p>Ms. Cruz presented the schedule of the next meetings:</p> <p>a) RCC Meetings</p> <ul style="list-style-type: none"> • 17 Mar 2023 • 21 Apr 2023 • 19 May 2023 <p>b) BRC Meetings</p> <ul style="list-style-type: none"> • 20 Mar 2023 – Ms. Cruz informed that there will be no RCC item for the February PEM Board Meeting.



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	c) PEM Board Meetings <ul style="list-style-type: none"> • 22 Feb 2023 • 29 Mar 2023 <u>Resolution/s:</u> ✓ The RCC noted the schedule of activities and the information provided.
VIII. Adjournment	The meeting was adjourned at 11:55 AM

Prepared by:

Reviewed by:

(signed)

DIVINE GAYLE C. CRUZ
 Sr. Specialist, Rules Review Division
 Market Assessment Group

(signed)

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

Noted by:

(signed)

BIENVENIDO C. MENDOZA, JR.
 Head, Market Assessment Group

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Approved by:

(signed)

JESUSITO G. MORALLOS
Chairman, Independent

(signed)

JOSE RODERICK F. FERNANDO
Member, Independent

(signed)

RACHEL ANGELA P. ANOSAN
Member, Independent

JORDAN REL C. ORILLAZA
Member, Independent

(signed)

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

(signed)

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

(signed)

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

(signed)

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

(signed)

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

[Attended by Mr. Getulio Z. Crodua (Alternate)]

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

ROCKY D. BAYAS
Member, Distribution Sector
San Fernando Electric Light & Power Company
(SFELAPCO)

(signed)

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

[Co-attended by Mr. Dennis R. Paragas (Alternate)]

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

(signed by Atty. Ng)

[Co-attended by Atty. Kristoffer S. Ng (Alternate)]

JOHN PAUL S. GRAYDA
Member, Market Operator
Independent Electricity Market Operator of the
Philippines (IEMOP)

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



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Annex B :

WESM Rules						
Title	Clause	Original Provision	Proposed Amendment	Rationale	Initial Comments	RCC Discussion/ Agreement (03Mar2023)
IEMOP to provide the following for RCC’s information: <ul style="list-style-type: none"> i. Summary information and/or statistics on ILP registration and bilateral contract quantities ii. Information on the issues encountered with the implementation of the Interim Protocol iii. Summary information and/or statistics on instances when the CRSS cannot be accessed by Market Participants because of force majeure events. 						
GLOSSARY	11	(new)	<u>Interruptible Load Program. The program wherein End-users, in accordance with their protocol with Network Service Providers, voluntarily agrees to either fully de-load, by disconnecting its delivery point that receives electricity, or partially de-load by reducing its load in response to alert or notice issued by the System Operator of an expected power shortage.</u>	To define Interruptible Load Program based on provisions of relevant rules and issuances on ILP	RAPAnosan: CONSISTENCY IN GRAMMAR NUMBERS <u>Interruptible Load Program. The program wherein an End-users, in accordance with their its protocol with its Network Service Providers, voluntarily agrees to either fully de-load, by disconnecting its delivery point that receives electricity, or partially de-load by reducing its load in response to an alert or notice issued by the System</u>	Adopt clerical revision

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WESM Rules						
Title	Clause	Original Provision	Proposed Amendment	Rationale	Initial Comments	RCC Discussion/ Agreement (03Mar2023)
					<p><u>Operator of an expected power shortage.</u></p> <p>RCC Secretariat (Preliminary Assessment):</p> <p>On the proposed definition of “Interruptible Load Program” in the WESM Rules, there is no corresponding usage, and the term is not also used anywhere in the WESM Rules.</p> <p>Consider providing policy provision in WESM Rules Section 3.5.2 Network Service Provider Data in consideration of the proposal for MO to consider ILP de-loading capacity in forecasted demand during real-time scheduling in Dispatch Protocol Manual (DPM) Section 9.3.4.</p>	<p><u>IEMOP</u>: Confirmed PEMC’s observation that defining ILP in the WESM Rules is a strategy to not define ILP in the affected Market Manuals.</p> <p><u>RCC</u>: Requested DOE for further inputs/clarification on the:</p> <ul style="list-style-type: none"> • Urgency of the proposal • Inclusion of ILP in the Market Rules and Manuals considering that this program is outside the market. <p><u>DOE</u>: Representatives will consult with their</p>

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WESM Rules						
Title	Clause	Original Provision	Proposed Amendment	Rationale	Initial Comments	RCC Discussion/ Agreement (03Mar2023)
					Further, suggest including provision on BCQ redeclaration for ILP quantities in WESM Rules.	principals on supplemental directives regarding the ILP in consideration of the RCC discussion on the proposal. (See item below on BSM Section 9.5) <u>RCC</u> : Request IEMOP to provide high-level or overarching provisions regarding ILP in the WESM Rules.

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WESM Manual on Dispatch Protocol Issue 18.0						
Title	Section	Original Provision	Proposed Amendment	Rationale	Initial Comments	RCC Discussion/Agreements (03Mar2023)
WESM Timetable – Week- Ahead Projection	4.3.3	(new)	<u>4.3.3 By 0800H of each trading day, Trading Participants shall endeavor to submit most up-to-date information on self-scheduled nominations, bids and offers for each one-hour interval of the next seven days consistent with the provisions of Clauses 6.1.7 and 6.13 of this Manual.</u>	To establish that Market Participants should provide inputs based on reasonable estimates of their expected capability for the upcoming week.	<p><u>RAPAnosan:</u></p> <p>Why not revise the WAP timetable in clause 4.3.2 instead of adding a new clause stating the obligation in words? This is also to avoid confusion.</p> <p>In the current timetable, submission of most recent data is before 0845H. Is the intention to revise this timeline to make it earlier, i.e., at 0800H? Or are we referring to a different timeline in the proposal? Why is the phrase “shall endeavor” used? Is the intention not to make the submission mandatory? Or</p>	<p><u>IEMOP:</u> Explained that while the proposed revision in this Section does not only affect ILP, such submission of inputs based on reasonable estimates likewise ensure system security (i.e., satisfying criteria for urgency).</p> <p><u>RCC:</u> Not adopt proposed new provision; revise Section 4.3.2 instead (see next row, Sec 4.3.2)</p>



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WESM Manual on Dispatch Protocol Issue 18.0						
Title	Section	Original Provision	Proposed Amendment	Rationale	Initial Comments	RCC Discussion/Agreements (03Mar2023)
					<p>is this merely directory, and that the TP may or may not submit?</p> <p>For clarity in compliance obligations, I suggest to use the same language/ tone used in the WESM Rules and in the reference clauses (6.1.7 and 6.13). My reading of the last two reference provisions is that the requirement is not merely to endeavor but to do – “to revise” or “to submit”.</p> <p>What is the “most up-to-date” information? The current WAP timetable uses the term “most recent”. In proposing to use a different term, is there an intended difference between most up to date and most recent?</p>	

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WESM Manual on Dispatch Protocol Issue 18.0						
Title	Section	Original Provision	Proposed Amendment	Rationale	Initial Comments	RCC Discussion/Agreements (03Mar2023)
					RCC Secretariat: On proposed DPM Sections 4.3.3 and 4.4.3 the phrase “shall endeavor” may not compel Trading Participants to provide the information for the WAP and DAP runs. Suggest to: a. Use more specific and compelling language for WAP/DAP runs since the WAP/DAP results are inputs to the SO’s determination of the hourly reserve requirements per DPM Section 15.5.1. b. Include the activities in the proposed sections in DPM Tables 1 and 2.	a. IEMOP to provide revised wordings b. IEMOP is amenable to include the activities in the proposed sections in DPM Tables 1 and 2 c. EIOImedo (IEMOP) explained that the data submitted at 0800H and the proposed 0845H are the same. IEMOP is nonetheless agreeable to retain the existing provision as long as references to Sections 6.1.7 and 6.13 of the DP Manual is added to invoke

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WESM Manual on Dispatch Protocol Issue 18.0						
Title	Section	Original Provision	Proposed Amendment	Rationale	Initial Comments	RCC Discussion/Agreements (03Mar2023)
					c. Difference of data submitted at 0800H and 0845H Proposed revised wordings: 4.4.3 4.3.3 <u>By 0800H of each trading day, Trading Participants shall endeavor to submit most up-to-date information on self-scheduled nominations, bids and offers for each one-hour interval of the next seven days consistent with Sections the provisions of Clauses 6.1.7 6.1 and 6.13 of this Manual</u>	Trading Participants' responsibility to revise their nominations or offers, as necessary.

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Title	Section	Original Provision	Proposed Amendment	Rationale	Initial Comments	RCC Discussion/Agreements (03Mar2023)
WESM Timetable – Day-Ahead Projection	4.4.3	(new)	<u>4.4.3 By 1130H, Trading Participants shall endeavor to submit most up-to-date information self-scheduled nominations, bids and offers for each one-hour interval of the next day consistent with the provisions of Clauses 6.1.7 and 6.13 of this Manual.</u>	To assist in accurate and timely declaration of alerts by the System Operator which is the basis for ILP activation	<p><u>RAPAnosan:</u></p> <p>SAME COMMENTS AS ABOVE</p> <p>Also, in the current DAP timetable, submission of most recent data is at STPH1 – 10 minutes? How is the proposed timeline to submit most up to date data at 1130H different from the timeline to submit most recent data before each hour at STPH1-10 mins? If these two submissions are different, I suggest to make the distinction clear.</p>	Revise Section 4.3.2 instead (see next row, Sec 4.4.2)
					<p>PEMC-MAG:</p> <p>On proposed DPM Sections 4.3.3 and 4.4.3 the phrase</p>	Same as above

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					“shall endeavor” may not compel Trading Participants to provide the information for the WAP and DAP runs. Suggest to: <ul style="list-style-type: none"> a. Use more specific and compelling language for WAP/DAP runs since the WAP/DAP results are inputs to the SO’s determination of the hourly reserve requirements per DPM Section 15.5.1. b. Include the activities in the proposed sections in DPM Tables 1 and 2. c. Difference of data submitted at 0800H and 0845H 	

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Title	Section	Original Provision	Proposed Amendment	Rationale	Initial Comments	RCC Discussion/Agreements (03Mar2023)							
					Proposed revised wordings: 4.4.3 By 1130H, Trading Participants shall endeavor to submit most up-to-date information self-scheduled nominations, bids and offers for each one-hour interval of the next day consistent with Sections the provisions of Clauses 6.1.7 6.1 and 6.13 of this Manual.								
WESM Timetable – Day-Ahead Projection	4.4.2	DAP Timeline			To establish that Market Participants should provide inputs based on reasonable estimates of their								
		<table border="1"> <thead> <tr> <th>Time</th> <th>Activity</th> <th>Responsible Party</th> </tr> </thead> <tbody> <tr> <td>Before [STPH1*</td> <td>Submit the most recent self-</td> <td>Trading Participants</td> </tr> </tbody> </table>	Time	Activity			Responsible Party	Before [STPH1*	Submit the most recent self-	Trading Participants	<table border="1"> <thead> <tr> <th>Time</th> <th>Activity</th> <th>Responsible Party</th> </tr> </thead> <tbody> <tr> <td>Before [STPH1*</td> <td>Submit the most recent self-</td> <td>Trading Participants</td> </tr> </tbody> </table>	Time	Activity
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		- 10 minutes]	scheduled nominations, bids and offers for all relevant hours of the DAP run	- 10 minutes]	scheduled nominations, bids and offers for all relevant hours of the DAP run consistent with the provisions of Clauses 6.1.7 and 6.13 of this Manual.	expected capability for the upcoming week.		
Real-Time Dispatch Scheduling - Responsibilities	9.3.4	(new)		<u>9.3.4 Network Service Providers shall be responsible for:</u> <u>a. Providing information on the committed MW demand for the</u>	To enable MO to consider ILP de-loading capacity in forecasted demand	<u>RAPAnosan:</u> For simplicity and clarity of language –	RCC: Defer decision on proposed amendment for the proponent to review the provision or revise the	

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WESM Manual on Dispatch Protocol Issue 18.0						
Title	Section	Original Provision	Proposed Amendment	Rationale	Initial Comments	RCC Discussion/Agreements (03Mar2023)
			<u>implementation of the Interruptible Load Program in accordance with the WESM Manual on Load Forecasting Methodology</u>	during real-time scheduling	Submitting the committed MW demand for xxx MAG: <u>9.3.4 Network Service Providers shall be responsible for:</u> a. Providing providing <u>information on the committed MW demand for the implementation of the Interruptible Load Program in accordance with the WESM Manual on Load Forecasting Methodology.</u>	wordings noting the comments of Mr. Morales (Distribution) regarding the difficulty for NSPs to comply if the submission of committed capacity for ILP is per hour.

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WESM Manual on Load Forecasting Methodology Issue 4.0						
Title	Section	Original Provision	Proposed Amendment	Rationale	Initial Comments	RCC Discussion (03Mar2023)
Responsibilities	3.4	(new)	<u>4.4.3 Network Service Providers shall be responsible for informing the Market Operator of the total MW demand per hour that is committed for the implementation of the Interruptible Load Program in accordance with Section 7.3 of this Manual and ensure such information's accuracy.</u>	To enable MO to consider ILP de-loading capacity in forecasted demand during real-time scheduling	RAPANosan: Maybe use the verb "submit" instead of "inform".	IEMOP: Amenable with RAPA's comments. RCC: Defer decision on proposed amendment for the proponent to review the provision noting the comments of Mr. Morales (Distribution) regarding the difficulty for NSPs to comply if the submission of committed capacity for ILP is per hour.
					PEMC-MAG: Proposed minor revision <u>3.4 4.4.3 Network Service Providers</u> <u>Network Service Providers shall be responsible for informing the Market Operator of the</u>	IEMOP: Amenable with PEMC's suggestion

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WESM Manual on Load Forecasting Methodology Issue 4.0						
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					<u>total MW demand per hour that is committed for the implementation of the Interruptible Load Program in accordance with Section 7.3 of this Manual and ensure such information's accuracy.</u>	
Customer Forecasts	7.3	(new)	<u>7.3 INFORMATION ON INTERRUPTIBLE LOAD PROGRAM IMPLEMENTATION</u> <u>7.3.1 By 2000H, Network Service Providers shall inform the Market Operator of the total MW demand per hour that is committed for the implementation of the Interruptible Load Program for the next day.</u>	To enable MO to consider ILP de-loading capacity in forecasted demand during real-time scheduling	RAPAnosan: Maybe use the verb "submit" instead of "inform".	IEMOP: Amenable with RAPA's and PEMC's suggestion
					PEMC-MAG: <u>7.3 INFORMATION ON INTERRUPTIBLE LOAD PROGRAM IMPLEMENTATION</u> <u>7.3.1 By 2000H, Network Service Providers shall inform the Market Operator of the total MW</u>	<u>RCC</u> : Defer decision on proposed amendment for the proponent to review the provision noting the comments of Mr. Morales (Distribution) regarding the difficulty for NSPs to comply if the submission of committed capacity for ILP is per hour.

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					<u>demand per hour that is committed for the implementation of the Interruptible Load Program for the next day.</u>	